

Preliminary Documentation Submissions Response Report

Peninsula Precinct, Brookwater Drive, Springfield, Queensland (EPBC 2020/8629)

1 October 2026
Our Reference:7399 E



Saunders Havill

PATHWAYS TO SUCCESS

1. Introduction

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), Springfield City Group Pty Ltd (SCG) commenced the public notification process for Peninsula Precinct Development, Springfield, Queensland (EPBC 2020/8629). It is noted the National Environmental Protection Agency are now the administering authority of the EPBC Act.

Public comments were invited on the Peninsula Precinct, Springfield, Queensland EPBC Act Preliminary Documentation Report from the 26 November to the 9 January 2026 inclusive of an extension. The end date for public submissions to be received was extended from the original date of 16 December 2025 to the 9 January 2026 as a result of a security setting on the nominated email address which caused emails from certain domains to be blocked. Further investigation revealed that neither the exact email address or number of submissions blocked could be determined. As a result, the most appropriate course of action to rectify this was to extend the period of submissions by another 15 business days.

A total of 140 digital submissions were received during this period. Of this, 27 were identified as submissions which were re-sent. These were either forwarded from the same individual or from another email address. These were reviewed and were confirmed to represent the same submissions as the original with no additional content added. Due to the duplication these submissions were manually excluded and noted as duplications. As a result, a total of 113 unique submissions were received. To assist in providing responses to the number of submissions received, submissions have been individually numbered 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**.

A large number of submissions (83) identified relatively high-level concerns with respect to impacts to critical habitat (theme 1) of which many used identical templates. Following this, the next dominant themes were concerns regarding the community and intergenerational value (theme 2) with 44 submissions. Due to the high level of similarity between a number of submissions, these submissions have been jointly addressed where possible through the grouping into themes.

One submission (069) comprised an email requesting receipt of submissions to be acknowledged.

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 to critical habitat	001, 002, 003, 004, 005, 006, 008, 010, 011, 012, 014, 015, 023, 024, 025, 026, 027, 028, 029, 031, 032, 033, 035, 037, 038, 039, 044, 045, 047, 049, 050, 053, 054, 055, 057, 058, 059, 060, 061, 062, 063, 065, 066, 067, 068, 070, 071, 073, 074, 075, 077, 078, 079, 080, 081, 082, 083, 084, 085, 086, 087, 088, 089, 091, 090, 092, 093, 094, 095, 096, 097, 098, 100, 101, 102, 103, 104, 105, 106, 107, 108, 110, 112	83
2	Community and intergenerational value	007, 010, 011, 013, 014, 015, 016, 017, 018, 019, 020, 022, 030, 042, 043, 045, 047, 048, 051, 052, 057, 058, 059, 060, 063, 064, 065, 067, 068, 073, 075, 076, 081, 085, 089, 095, 096, 097, 098, 101, 102, 104, 109, 111	44
3	Impacts to the koala	004, 006, 007, 009, 011, 019, 025, 034, 035, 036, 038, 039, 040, 041, 042, 048, 049, 050, 056, 058, 060, 061, 062, 068, 073, 090	26
4	Impacts to grey-headed flying-foxes (roosts)	021, 065, 090	3
5	Impacts to the greater glider	007, 008, 060, 077, 083, 090	6
6	Site Design and Avoidance-Mitigation Hierarchy	007, 008, 010, 034, 036, 040, 041, 048, 051, 052, 060, 061, 062, 065, 068, 072, 073, 074, 077, 083, 090	21
7	Cumulative impacts	007, 008, 021, 036, 061, 062, 064, 065, 072, 077, 078, 083, 091, 103	14
8	Other protected matters	007, 040, 041, 042, 044, 048, 052, 062, 090, 093, 094, 095, 103	13
9	Woogaroo Vine Scrub	010, 015, 077, 083, 089, 099	6
10	Environmental impacts	007, 015, 016, 018, 019, 020, 021, 025, 030, 041, 042, 043, 045, 048, 051, 057, 058, 059, 062, 065, 067, 072, 077, 083, 086, 090, 093, 094, 097, 099, 109	31

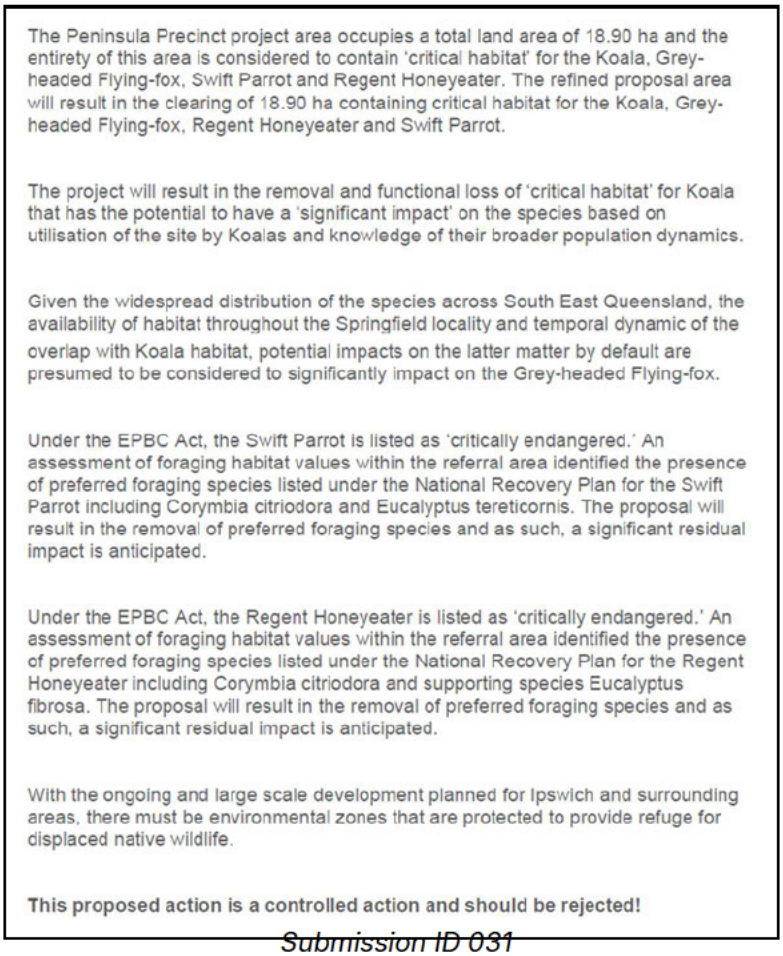


Theme No.	Theme	Submission ID	Number of submissions
11	Offset suitability	008, 009, 021, 036, 040, 042, 064, 078, 093, 094, 095	11
12	Adequacy of survey effort	014, 015, 025, 036, 065	5
13	Habitat quality assessment method	113	1
14	Indigenous and cultural value	015, 022, 040, 062	4

2. Response to Submissions

2.1. Theme 1 – Impacts to critical habitat

A total of 83 submissions opposed the development on the basis of the proposed vegetation clearing and impacts to critical habitat. A representative submission is provided below.



The Peninsula Precinct project area occupies a total land area of 18.90 ha and the entirety of this area is considered to contain 'critical habitat' for the Koala, Grey-headed Flying-fox, Swift Parrot and Regent Honeyeater. The refined proposal area will result in the clearing of 18.90 ha containing critical habitat for the Koala, Grey-headed Flying-fox, Regent Honeyeater and Swift Parrot.

The project will result in the removal and functional loss of 'critical habitat' for Koala that has the potential to have a 'significant impact' on the species based on utilisation of the site by Koalas and knowledge of their broader population dynamics.

Given the widespread distribution of the species across South East Queensland, the availability of habitat throughout the Springfield locality and temporal dynamic of the overlap with Koala habitat, potential impacts on the latter matter by default are presumed to be considered to significantly impact on the Grey-headed Flying-fox.

Under the EPBC Act, the Swift Parrot is listed as 'critically endangered.' An assessment of foraging habitat values within the referral area identified the presence of preferred foraging species listed under the National Recovery Plan for the Swift Parrot including Corymbia citriodora and Eucalyptus tereticornis. The proposal will result in the removal of preferred foraging species and as such, a significant residual impact is anticipated.

Under the EPBC Act, the Regent Honeyeater is listed as 'critically endangered.' An assessment of foraging habitat values within the referral area identified the presence of preferred foraging species listed under the National Recovery Plan for the Regent Honeyeater including Corymbia citriodora and supporting species Eucalyptus fibrosa. The proposal will result in the removal of preferred foraging species and as such, a significant residual impact is anticipated.

With the ongoing and large scale development planned for Ipswich and surrounding areas, there must be environmental zones that are protected to provide refuge for displaced native wildlife.

This proposed action is a controlled action and should be rejected!

Submission ID 031

Response to Theme 1

It is acknowledged that the koala, grey-headed flying-fox, swift parrot, regent honeyeater and their habitat are listed as threatened at all levels of Government in South East Queensland, and that under the action 18.9 hectares (ha) of vegetation defined by DCCEEW as critical habitat for these species will be impacted.

A range of field surveys were completed across and adjoining the site as part of the assessment of impacts and to identify potential presence and habitat for these species included spotlighting, Spot Assessment Technique (SAT) surveys, BioCondition transects and several days of tree plotting of hollow-bearing trees whereby individual trees were located and assessed (refer **PD Section 3.4.3** for field survey details).

The proposal includes mitigation and avoidance measures to reduce immediate and long-term impacts on MNES. While impacts are proposed to the entire 18.9 ha referral area, this development area was conceptualised based on an agreed avoidance strategy and tenure agreement with Ipswich City Council. The Peninsula Precinct comprises 18.9 ha of land within Lot 163 on SP303741. The Opossum Creek corridor exclusion zone which is land earmarked for retention as wildlife corridor is proposed to be retained adjoining the development area to the east and north and will result in between 120 and 220 m of vegetation retained (refer **PD Plan A1 and Sections 4.1 & 4.2**).

As part of obtaining local development approvals, management plans will be developed and implemented to maintain and improve habitat within the Opossum Creek corridor including a Rehabilitation Management Plan and Nest Box Management Plan to offset the loss of hollow-bearing trees from the site (refer **PD Section 5.4**).

Notably, impacts to habitat critical to the survival of the koala, grey-headed flying-fox, swift parrot and regent honeyeater due to the proposed action are to be offset as per the EPBC Act Environmental Offsets Policy and agreed with DCCEEW. As per **PD Section 6**, an environmental offset is to be delivered in partnership with Montauban Environmental Offsets (MEO). An agreement has been made between SCG and MEO regarding the offset land within the Rosevale Offset Property. The 41.3 ha offset area proposed to compensate for impacts to critical habitat under this proposal is located within the approximately 800-ha offset property which will broadly deliver offsets for a range of species including the koala, grey-headed flying-fox, swift parrot and regent honeyeater. Management of this offset will be in accordance with the Offset Management Plan included at **PD Attachment A9**. The proposal to offset impacts as a result of the action via an agreement with MEO will provide measurable value to the MNES being impacted during the course of the offset program implementation and is considered in keeping with the intent of the EPBC Act Environmental Offsets Policy.

Submission 031 states that a significant residual impact on the swift parrot and regent honeyeater is anticipated due to the presence of preferred foraging species listed under their respective National Recovery Plans. The following detail is provided in response to both species. Please refer to **PD Section 4.7.3** (swift parrot) and **PD Section 4.8.3** (regent honeyeater).

Swift Parrot:

The *National Recovery Plan for the Swift Parrot Lathamus discolor* (DCCEEW, 2024) identifies several actions and performance criteria that work toward the recovery of the species. Key actions include the management and protection of known breeding and foraging habitat at the local, regional and landscape scale, reducing sugar glider predation at breeding sites, understanding population dynamics and monitoring threats and other sources of mortality.

While habitat clearing for development is identified as a threat to the species (DCCEEW, 2024), it is not known the extent to which this process in Queensland has or is contributing to the decline of the species or its relative abundance within the Queensland range. The impact of clearing is disproportionately represented by breeding areas which are identified as “scarce and fragmented” in the Recovery Plan. Additionally, key threats to the species occur only in breeding habitat (*i.e.,* predation by sugar gliders) which is acknowledged to affect breeding success for the species and declines for the species. It is considered that the extent to which clearing for urban development in foraging habitat contributes to declines in the species is reduced compared to the same impacts in areas of key breeding habitat.



Additionally, Queensland does not contain any Key Biodiversity Areas for the species, with critical areas for the species located within New South Wales, Victoria and Tasmania. The site also contains only two (2) of the ten (10) preferred foraging species (DCCEEW, 2024), and large areas of potential foraging resources are highly abundant within the landscape including the Greenbank Military Training Area, Flinders-Karawatha Bioregional Corridor and White Rock Conservation Park and SEQ region, the volume of clearing on-site is not considered to be of a scale that would impede the capacity for foraging within the locality.

The removal of vegetation will reduce the extent of potential foraging resources; however, it is not considered that the development will interfere substantially with the recovery of the species.

Regent Honeyeater:
The National Recovery Plan for the Regent Honeyeater (*Anthochaera phrygia*) (DoE, 2016) highlights the importance of protecting high quality habitat and rehabilitating degraded habitats where the species is likely to occur. While the site is located within the foraging range for the species, it is also noted that only one (1) preferred foraging species (*Corymbia citriodora*) (DoE, 2016) and regent honeyeaters prefer the wettest, most fertile sites within box-ironbark associations such as along creek flats, broad river valleys and foothills. Habitat which potentially meets this description is recorded in association with adjoining gully lines and sloping hillsides. Given the superior mobility capacity of the species and abundance of preferential habitat within close proximity of the referral area (Greenbank Military Training Area and White Rock Conservation Park located within the Flinders-Karawatha Corridor), the volume of clearing on-site is not considered of a scale that would impede the capacity for foraging within the locality.

The removal of vegetation will reduce the extent of potential foraging resources; however, it is not considered that the development will interfere substantially with the recovery of the species as foraging needs can continue to be supported by the abundant foraging resources available in White Rock Conservation Park and the Flinders-Karawatha Bioregional Corridor.

2.2. Theme 2 – Community and intergenerational impacts

A total of 44 submissions highlighted community and intergenerational impacts as a concern. These submissions focused predominantly on the overall importance of the green space to community residents highlighting factors such as recreation and proximity to wildlife and natural areas as key values and the anticipated loss or reduction of these values as a result of the development. A sample of representative submission extracts are provided below (007, 010, 019 and 058 Extract 1).

A small number of these submissions highlighted the anticipated impact of an increase in the local population on traffic, crowding and access to facilities (019 and 058 Extract 2).

Development Inconsistent with enjoyment for future generations
EPBC 2020/8629 proposes the destruction of 18.9ha of remnant vegetation that can otherwise currently be enjoyed by residents of the broader community. The naturalised "green" area of Woogaroo Forest provides enjoyment for current and future generations of the area and destruction of more native vegetation communities for the purpose of housing and retail is inconsistent with the intent of the EPBC Act in that this project significantly impacts habitat for critically endangered species and removes any and all carbon sequestration and oxygen generation that the current biotic community provides and will provide for future generations.

Submission ID 007



With preparations for the 2032 Olympics underway, and the Brighton Arena of Greater Springfield a venue for immense international traffic, it would be a matter of national shame for this area to be cleared of all of its biodiversity, not least koalas. Be warned, the international community will be made aware that essential habitat for these species continues to be cleared. These animals have nowhere else to go.

Alternatively, positively, there is a terrific opportunity for this area, close to Brisbane, to be preserved, clnot only for the animals, but for the education, mental health and enjoyment of this community, for generations to come.

Submission ID 010

Lastly, residents of the nearby area as well as many visitors from Ipswich and Brisbane enjoy Woogaroo Forest. It is an excellent area for bush walking, bird watching, nature bathing, foraging, nature journaling, and many other recreational activities that greatly improve mood, cognitive function, and physical and mental health. I can personally attest that my regular walks on Woogaroo Forest have had a very positive effect on my mental health. There is little left of such significant areas around Ipswich. Therefore, for the residents of Ipswich and afar who rely on Woogaroo Forest for the positive impact it has on their health and wellbeing it should be protected from any further development.

Submission ID 019 and 058 – Extract 1

Further reasons that this development should not be allowed are the following negative impacts on current communities of the surrounding area (including Camira, Gailes, Brookwater, Springfield, Springfield Lakes, Augustine Heights, Bellbird Park and Spring Mountain). A development of this size will bring significantly more traffic to the area - to roads that are already congested during peak times - including a knock-on effect to nearby areas. The congestion of crawling traffic I see every day while driving down Old Logan Road to my street is already too much. The traffic from this Peninsula Precinct would not only make it more difficult for current residents in these suburbs to get to and from work but also to get to essential services such as the grocery store - my 5 minute trip to the local Coles is tripled during peak hours.

Submission ID 019 and 058 - Extract 2

I believe protecting the ecological and recreational value of the biodiversity that attracted people to the region is far more important than destroying it for housing that could go elsewhere with less impact. For the future of people and planet, please Save Woogaroo Forest.

Submission ID 082

Response to Theme 2

The area of vegetation within which the Peninsula Precinct occupies is part of a larger patch of vegetation, which is comprised of a mix of privately owned and Council-owned land. The proposed action will remove 18.9 ha of vegetation within privately owned land which is zoned as 'Town Centre' under the Springfield Structure Plan (SSP) (refer **PD Section 5.1**).

This development area was conceptualised through the SSP and is based on an agreed avoidance strategy and tenure agreement with Ipswich City Council as intended to be delivered through the SSP. The project covers a small footprint in the scheme of the development area provided and results in very little relevant or meaningful opportunity for further avoiding impacts on MNES habitat beyond those already provided in the broader SSP.

A key outcome to be delivered under the SSP which may provide specific value to the local community is the retention of Opossum Creek corridor as a mix of creek line open space and district parkland (refer **PD Figure A9**). At a more macro level, the Opossum Creek corridor exclusion zone which is land earmarked for retention as wildlife corridor will be retained adjoining the development area to the east and north and will result in an intact and contiguous corridor varying in width from 120 and 220 m (refer PD **Plan A32**). While outside of the referral area, this reflects the intent of the surrounding land for environmental retention as planned through the SSP.

Submissions cite the importance of green space from the perspective of mental health and wellbeing noting particular value drawn from the vegetation within the action site for local residents (e.g. submissions 019/58). The preservation of green space has been balanced by the development design and overall aims of the SSP. While the project will remove 18.9 ha of vegetation, development areas will be balanced with open space and vegetation retention within the proponent's broader landholdings.

Currently, access to Opossum Creek is limited to the developed areas of Brookwater and Springfield where adjoining council-owned land. The development of the Peninsula Precinct will promote proper access to Opossum Creek for community residents. As noted previously, access outside of these areas including the Peninsula Precinct is not free for use by the public therefore reducing potential benefit for the public from a recreational point of view.

Additionally, it is noted that the vegetation patch within which the development site is located is the product of progressive clearing and development over the past 20 years within the surrounding areas of Brookwater, Spring Mountain, Camira and Bellbird Park; the suburbs of which comprise the community that utilise or draw value from the natural areas associated with the development site. In addition to the existing wildlife / open space areas with Opossum Creek, Woogaroo Creek and O'Dwyer's Gully and the areas to be delivered as part of the action, there are a multitude of wildlife and open space areas within the Greater Springfield locality that residents are free to enjoy for recreational use. Bushwalking opportunities are present within the nearby Springfield-Greenbank Conservation Area and White Rock Conservation Park. Open space areas interwoven throughout Greater Springfield, which include a mix of recreational open space and retained vegetation, provide abundant opportunity for residents to incidentally and purposefully interact with green spaces areas. The delivery of green space areas has been an integral part of the delivery of the Springfield City master plan with the key purpose of promoting physical health, improved mental wellbeing and socialisation through creating access to bushwalking opportunities, cycling, sports facilities among other outdoor activities. There are various parks and walking trails adjoining Mountain Creek which traverse a large portion of Greater Springfield as well as linear creek line areas throughout Springfield Lakes, Brookwater and Spring Mountain.

In response to the concerns around increased local traffic and crowding expressed in some of the submissions, there are multiple provisions in place that will mitigate impacts associated with this. The development will be subject to rigorous assessment by Ipswich City Council as part of obtaining local approvals. This will include assessment and detailed design that will be required to be supported by specialist consultant roles including traffic engineers. The potential impacts on traffic has also been considered at a broad planning level. Notably, the Peninsula Precinct is located on a major collector road (Brookwater Drive) which is part of the city's primary bus route. Additionally, its location will provide residences with walkable access to the town centre, train station, schools, shops and health facilities that is anticipated to alleviate stress on the local traffic network (refer **PD Section 5.1**).

Submission 082 states "housing could go elsewhere with less impact." It is unclear what areas of land the submitter is referring to, however, the viability of other landscapes for the proposed development is comparatively reduced as there is no existing infrastructure investment, meaning the land use requirements and overall infrastructure delivery would be much greater to deliver a similar sized development output. Additionally, part of the development location includes consideration of where resources are most required. The Peninsula Precinct will provide medium density residential lots and other community facilities with the purpose of providing resources to the existing community.

2.3. Theme 3 – Impacts to the koala

A total of 26 submissions were received which cited impacts to koala specifically as a key concern. Key points raised include concerns around displacement of existing resident koalas, loss of refuge, exposure to threats and impacts to broader population dynamics and long-term viability within the landscape.

A sample of representative submission extracts is provided below.

> Significant impact on Koala (endangered) habitat and the local availability of habitat in the local area (Springfield locality). The EPBC Status of Koala has been under-represented as Vulnerable in Table A5 in the Preliminary Documentation (PD). This species has been represented as "Known" within the PD.

Submission ID 007

> Koalas are listed as Endangered in QLD, NSW and the ACT, and their numbers in QLD continue to decline. The federal government has committed itself to stemming the loss of endangered species, including the koala. A key factor in their ongoing decline is the loss of suitable habitat, so the first and most obvious step to reverse their decline should be to prevent loss of any more koala habitat.
>
> The proponents say that the "disposal method" for any koalas or other threatened species that are present in the forest before it is cleared will be "euthanasia, translocation or re-release". I understand that research has shown that koalas that are translocated or re-released after being removed from a development site suffer considerable mortality rates. In other words, this development will result in the death of a considerable proportion of the koalas that are displaced by the development. Any compensatory increase in koala numbers as a result of the offset planting of new trees (see comment below) will be many years into the future, if ever.

Submission ID 009

> Clearing Woogaroo Forest for residential development will not solve the housing crisis and instead will present another crisis that will be much longer lasting. If the animals don't directly die as a result of this clearing then you will be pushing them further into urban areas only to be hit by cars, attacked by cats and dogs, and starve to death. Only the other day I saw a koala crossing warning sign so there is acknowledgement that threatened iconic species exist in this area only for it to be disregarded when there's money to be made because after all "greed is good".

Submission ID 050



> Clearing koala habitat directly undermines the **National Koala Recovery Plan**, the **National Koala Monitoring Program**, and the **Great Eastern Ranges initiative**. Land clearing is a listed **Key Threatening Process** under the EPBC Act. Approving this proposal would perpetuate that process.

Submission ID 061

Response to Theme 3

In response to Submission ID 007, it is acknowledged the koala is now listed as Endangered under the EPBC Act, however, the Controlled Action decision was based on the determination of potential impacts on Matters of National Environmental Significance (MNES) and their listing at the time of referral being the Vulnerable status (refer **PD Section 1**). The koala has been represented as 'known' within the likelihood of occurrence assessment within the PD. This is the highest level of potential presence that can be assigned based on the criteria as it confirms presence of the species within the site (refer **PD Section 3.1 and Table A4**).

Increased exposure to threats such as increased conflict with urban area and predation as a result of the proposed vegetation clearing were raised by a number of submissions, highlighted in the above submission 050. The proposed development while resulting in a reduced volume of available habitat, will not result in fragmentation or isolation of habitat. The Opossum Creek corridor will also be retained adjoining the development site which will result in the delivery of a functional and intact wildlife corridor with widths between 120 and 220 m to be delivered per the designation in the SSP (refer **PD Plan A32**). Through the retention of key wildlife corridors, koalas will continue to persist within the retained habitat areas of Opossum and Woogaroo Creeks. Predation by dogs is a known threatening process on koalas and is prevalent within urban and peri-urban areas. The threat of predation by wild or domestic dogs is acknowledged as an existing threat within the site due to the proximity to residential areas (refer **PD Section 4.4.3**).

In response to submission 009, the disposal methods include euthanasia, translocation and re-release and is linked to the Wildlife Capture and Disposal Plan (refer **PD Section 5.2.5**). These methods are provided in the Draft Code of Practice for the welfare of animals affected by land-clearing and other habitat impacts and are to be undertaken by qualified fauna spotter catchers with relevant permits. It is acknowledged that translocation is not a preferred method and is avoided where possible. Under the *Nature Conservation (Koala) Conservation Plan 2017* koalas are required to be left in situ and move by their own volition rather than being handled or translocated (refer **PD Section 5.2.4**). The prevailing legislative requirements under the *Nature Conservation Act 1992* and *Nature Conservation (Koala) Conservation Plan 2017* will be implemented during clearing works.

A range of survey techniques to detect koala and measure relative abundance of the local population have been utilised over a number of years. This included the SAT survey methodology (2020), spotlighting (2022, 2023) and drone surveys (2023). Field surveys identified two (2) Koalas within the survey area. A koala was observed on a total of four (4) occasions (1 during diurnal surveys, 1 by spotlight, 2 by Remotely Piloted Aircraft (RPA)) (refer **PD Section 3.3.4 (g)**).

A habitat connectivity and sustainability analysis was completed by BAAM Ecological Consultants to examine the surrounding barriers to movement for the koala and the capacity of the vegetation retention

areas and surrounding creekline areas to support the local Koala population. The analysis is provided at **PD Attachment A4**.

Additionally, detailed koala presence surveys will be undertaken by engaged fauna spotter catchers prior to any land clearing (refer **PD Section 5.2.4**). A Site Based Management Plana and Vegetation Clearing and Fauna Management Plan will be developed which detail measures to be implemented such as the identification of fauna safe havens and clearing protocols as required under the *Nature Conservation Act 1992* and *Nature Conservation (Koala) Conservation Plan 2017*. Many fauna spotter catchers utilise thermal drone imagery as part of pre-clearance surveys to detect koalas. It is acknowledged that koalas occur within the site and broader vegetation patch and as a result, best practice tools will be used to ensure any koalas are identified as part of clearing works.

In response to submission 050, it is acknowledged that land clearing is a key threatening process to koala as identified under the Commonwealth Koala Conservation Advice. The proposed clearing and impacts to koala habitat has resulted in referral of the action and subsequent assessment via Preliminary Documentation under the EPBC Act (refer **PD Section 1**).

2.4. Theme 4 – Impacts to grey-headed flying-fox (roosts)

Three submissions (ID 021, 065 and 090) were received which noted the potential for impacts on the grey-headed flying-fox, outside of general impacts to critical habitat, citing the presence of a roost within 2 km of the site as a primary factor. Submission 021 also referenced the potential for increased proliferation of disease.

• A confirmed flying fox colony nearby

Long-term observations confirm that a flying fox roost exists approximately 2km in distance of this forest canopy. Protecting this colony requires this forest to continue providing in full:

- Reliable mixed canopy food sources & shelter
- Quiet buffer zones free of intrusive noise, lighting, and domestic animals
- Potential year-round roosting habitat

Maintaining the forest in full is the only way to ensure this roost can survive. High mortality, disease & stress is expected to affect the flying fox colony if clearing is undertaken, due to these reasons.

Submission ID 065

Grey-Headed Flying Fox

There is a Flying Fox camp nearby in Camira, along Sandy Creek, perhaps 2kms from this block. Grey-Headed FF use this camp regularly and Bat Rescue monitor this site. Regular heavy flowering of Gum-topped Box (*Eucalyptus moluccana*) across the district, in April 2024 and April/May 2025, provides excellent resources for GHFF. Broad-leaved Ironbark flowered in July/August 2024 and in July 2025 and no doubt provides substantial nectar resources for GHFF. There is a sequential burst of canopy flowering that covers most of the year.

Any mature canopy of mixed species near this camp, such as Lot 163, would provide an extended nectar resource essential for GHFF. The loss of 18Ha of canopy would certainly impact GHFF.

Submission ID 090



> The fragmentation will result in increased predation, weed infestation and can have a lag in for the effects to be fully viable - Nelder et al. 2017 stated that Queensland is likely to be carrying a large extinct debt particularly in the heavily cleared and fragmented bioregions (such as South East Queensland). Removal of this large patch of vegetation will likely also impact Grey Headed Flying Fox and human interactions negatively by the nearby colonies having too forage in residential gardens and streets. As stated in the Saunders Havill report, there are 10 active Grey Headed Flying Fox camps within 20km of the site. In particular, zoonotic diseases such as Hendra virus and Nipah virus are shown to be more prevalent and pose greater risk to people when the habitat is fragmented for flying foxes (Brown and Bevins, 2017).

Submission ID 021

Response to Theme 4

While these concerns could be captured broadly under impacts to critical habitat (Theme 1), due to the specific statements made in the submissions regarding the proximity of the site to a grey-headed flying-fox roosting site, it was considered necessary to address these submissions separately.

Flying fox monitoring data published by the CSIRO containing data up until 31 December 2023 does not show any flying fox roosts (active or inactive) within 2 km of the site. There are two recorded inactive grey-headed flying-fox roost sites identified as Camira, Langley Road (1152) and Camira, Barbara Street (140) within a 5 km radius of the site (refer **PD Section 3.3.5 and Plan A17**). Grey-headed flying-foxes are known to occur within the locality; however, roost monitoring data and on-site surveys confirm impacts are limited to foraging habitat only. Impacts on the grey-headed flying-fox are acknowledged to result from the proposed development.

In response to submission 021, while the development will result in the reduced volume of habitat, the habitat areas of Opossum Creek and Woogaroo Creek will remain relatively intact. Abundant foraging resources are available within the locality which will continue to allow grey-headed flying-foxes to forage and maintain separation between humans and flying foxes. It is noted that the study cited (Brown, V. R., & Bevins, S. N. (2017) is based on birds not flying foxes. Notwithstanding, the risk of transmission of zoonotic diseases associated with grey-headed flying-foxes is considered low. Extensive vegetation adjoining the site and throughout the surrounding landscape provides abundant alternative foraging and roosting resources, such that flying-fox activity is expected to remain dispersed across the broader landscape rather than concentrated within the development area. Accordingly, the proposal is unlikely to increase the frequency of human–flying-fox interactions or elevate the risk of zoonotic disease transmission relative to existing conditions.

Separately, it was identified following the period to receive comments that the grey-headed flying-fox roost identified as Camira – Stephen Cook Memorial Park roost was not included on **Plan A17** due to a location issue with the site in the CSIRO database. A review of the CSIRO monitoring data published in February 2026 now includes the correct location information for roosting site therefore has been included.

2.5. Theme 5 – Impacts to Greater Glider

A total of six submissions made representations that the impact would have significant and unacceptable impacts on the greater glider. And extract of one of these submissions is provided below and due to the length of one of the submissions (008), it has been provided as **Appendix A**.



Greater Glider (endangered)
Greater Gliders used to be common and found around here. Incessant clearing in Springfield and nearby areas could easily push Greater Gliders into this area. A recent find west of Esk in Deongwar State Forest shows that GG can exist in logged, sub-optimal forests. They are found fairly close by in Spring Mountain and Greenbank Army land. It is **"highly likely"** that they are here too, especially since there are large Flooded Gums along Mountain Creek.

Submission 090

This project in association with those referenced above (also within Woogaroo Forest) should be deemed unacceptable with emphasis on the following factors:

1) A significant number of trees with hollows as habitat for key threatened species including Greater Glider (Endangered) with an ALA record within 200m of the proposed impacts

Submission ID 007

This Peninsula Precinct referral area is of particular importance for local biodiversity and EPBC-listed species in the area due to extensive surrounding development that has rendered this lot the **last remaining wildlife corridor** connecting Woogaroo Forest to the Greenbank Military Range (via Springfield Lakes river corridors) through to Whiterock Conservation Area (via western Greenbank). Without habitat connectivity, the genetic viability, and thus population viability, of many species are at serious, unacceptable risk. For example, fragmentation of habitat is a well-known threat for the Endangered Koala (e.g. Frere et al, 2023), a species found regularly in the referral area and throughout Woogaroo Forest (an area verbally defined at the start of this letter). **Greater Gliders** face similar population viability and habitat connectivity issues, and this species may be in the referral area due to confirmed sightings in nearby similar forests (Whiterock Conservation Area). As such, thermal drone surveys are required in winter to appropriately survey for this species in subtropical regions such as the referral area.

Submission 083

Response to Theme 5

While relatively detailed commentary is provided in the above submissions and submission 008, they do not acknowledge the broader assessment provided in the PD that supports the conclusion that the greater glider is unlikely to occur within the project area and therefore will not be significantly impacted by the action.

The PD acknowledges the following:

- A greater glider population is known to occur within the broader locality within the contiguous habitat areas of the Flinders-Karawatha Bioregional Corridor including White Rock Conservation Park, Greenbank Military Training Area (refer **PD Section 3.3.6 (d)**).
- Suitable foraging and denning habitat to support the greater glider is present within the action area and broader vegetation patch (refer **PD Section 3.3.6 (c)**).

The Preliminary Documentation Report concluded based on a detailed assessment combining landscape connectivity analysis and detailed review of on-site and landscape-wide habitat characteristics that the greater glider was unlikely to occur within the site, or broader patch within which the site is located (refer **PD Section 3.3.6 and 4.9**).

Submission 007 cited the presence of hollows within the impact site and the presence of a greater glider record within 200 m of the site as the primary reasons for determining an impact and subsequently deeming this impact as unacceptable. The use of the word "unacceptable" appears to align with terminology which is being adopted as part of the 2025 EPBC Act reforms. However, while there are some effects that may influence projects already under assessment, these reforms are predominantly designed to affect new projects being assessed or referred under the EPBC Act.

As indicated by submission 007, there is an Atlas of Living Australia (ALA) record dated 2023 located within Brookwater adjoining the development site. However, this spatial certainty of this record was interrogated through ALA who provided confirmation that the record location had been obfuscated due to data sensitivity (refer **PD Section 3.3.6 and Plan A22**). The un-obfuscated location of the record was confirmed to be within White Rock Conservation Park. It is acknowledged the site contains potential habitat to support the greater glider when considering presence of vegetation and habitat type and presence of hollows. However, the primary limiting factor for potential presence within the site and persistence within the broader vegetation patch is a lack of functional connectivity, enabled through the delivery of the adjoining developments within the SSP area.

Surveys to detect the presence of greater glider were completed within and adjoining the action area utilising a mix of suitable survey methodologies including line-transects (spotlighting) and thermal drone surveys. Submission 083 states "Greater Gliders face similar population viability and habitat connectivity issues, and the species may be in the referral area due to confirmed sightings in nearby similar forests (Whiterock Conservation Area). As such, thermal drone surveys are required in winter to appropriately survey for this species in subtropical regions such as the referral area."

Thermal drone surveys were completed during spring in September 2023 across the referral area and adjacent areas. However, it is noted that many of the survey methodologies available do not specify seasonal timing for surveys. It is possible that surveys conducted in winter may increase the chance of detection due to greater glider's sensitivity to heat stress and lower density canopy coverage (Eyre et al. 2022). Spotlighting and thermal drone surveys only detected common arboreal species and birds including brush-tailed possums, tawny frogmouths and sugar gliders (refer **PD Plan A27**).

The following passage has been added to the **PD Section 3.3.6 (f)**.

Thermal drone surveys are becoming an increasingly used method for detecting greater glider, with recent studies demonstrating detection rates comparable to traditional spotlighting and, in some cases, improved ability to identify individuals across larger and less accessible areas (Wagner et al. 2025; Vinson et al. 2020). Thermal surveys are particularly effective for detecting low-density or widely dispersed populations and can complement ground-based methods by increasing overall survey coverage and reducing the likelihood of false absences (Wagner et al. 2025). However, consistent with current best practice and survey guidance, no single survey technique is considered sufficient in isolation due to inherent detection limitations associated with each method (e.g. canopy obstruction, observer bias, and environmental conditions) (Vinson et al. 2020; Commonwealth of Australia 2013). Accordingly, the combination of best practice survey approaches utilised including thermal drone surveys and spotlighting is considered suitable to detect the species.



Submission 008 (pages 3-7) provided at Appendix A of this document summarises the findings of the assessment located in **Section 3.3.6 of the PD** and similarly concludes that the development site contains potential habitat for the greater glider, however, is functionally separated from surrounding conservation areas where greater glider are known to occur including White Rock Conservation Park and Greenbank Military Training Ground.

Submission 008 goes on to state that development within the Springfield area which has caused the observed habitat fragmentation has in doing so failed to uphold the commitments in the SSP, specifically that to "preserve the diversity of habitats for flora and fauna", referencing Section 8 Conservation Designation. However, it is noted that the aim "to preserve the diversity of habitats for flora and fauna" which is referenced is directly in relation to the areas mapped as Conservation under the SSP which includes the large contiguous patch known as White Rock-Spring Mountain conservation park (refer **PD Figure A9 and Plan A7**). The linear corridors located within the SSP align predominantly with waterway corridors and are designated accordingly as creek line open space. Their delivery on ground in many locations exceeds the minimum requirements for wildlife habitat retention and connectivity originally intended under the SSP through the provision of wider corridor widths and fauna culvert structures.

It should be noted that the overall intent of the SSP is to accommodate population growth within the Springfield region while also setting out to retain and consolidate high value habitat areas within the areas mapped as conservation and preserving valuable creek line open space areas. The consequence of reduced biodiversity in and around development areas and consolidation within earmarked conservation areas is not inconsistent with the intended outcomes of the SSP.

2.6. Theme 6 – Site Design and Avoidance-Mitigation Hierarchy

A total of 21 submissions identified avoidance and mitigation strategy as a concern for the proposed development. Several submissions cited a lack of avoidance of impacts at the local scale, while others considered lack of avoidance more broadly such as in terms of fulfilling national conservation targets including the "30 by 30" target. These differing sub-themes are considered separately below.

Local scale

> **Koala is "endangered" and this area is a koala habitat.**
> Now that the Koala is "endangered" there would be high expectations of much more "Avoidance" and "Mitigation" and less reliance on "Offset". State Code 25 and associated Guidelines would be a bare minimum standard for development in all Koala habitat areas in SEQ. Guidelines by McAlpine, *et al* in 2007 would also be appropriate. Every professional applies the appropriate codes and standards to their work. Professional urban designers ought to apply the appropriate codes to their work. This area is no different. It is just urban development, regardless of any Structure Plan and ought to be designed with MNES in mind (and MSES for that matter).



An internal road near the creek goes underwater in Flood. It will no doubt be handed back to Council should more detailed analysis be done. The road plus buffer would reduce the area needed to be cleared. Setbacks from Mountain and Possum Creeks would also reduce the development footprint – the boundary is on the creek in a few places. The Ipswich Infrastructure Plan shows much more Open Space than that proposed here. Thus, the proposal for the area wanting to be cleared is **confused** and **certainly cannot be accepted as is**.

Submission ID 090

Nature of this Development

This block has significant vegetation for Koalas in the context of Greater Springfield. It is zoned as "town centre" under the Ipswich Planning Scheme, and under a master plan called the Springfield Structure Plan (SSP). It was originally gazetted as a Development Control Plan (DCP) in 1997 under an old planning act. Koalas in SEQ have been declared "endangered" under State and Federal Legislation. However, Federal legislation still applies.

The developers propose to destroy all the vegetation on this block. No consideration for wildlife or intention of meeting any codes of the Ipswich Planning Scheme – nothing "sustainable" or "best practice" or "professional".

Submission ID 060 and 068

Peninsula Design

This proposal for Peninsula admits to making NO attempt to avoid impacts on MNES at all. The landscape offers some opportunities to avoid impacts, but 18Ha will be totally cleared.

There has been NO attempt to mitigate impacts on MNES either. Once again, the terrain offers many opportunities to mitigate certain impacts.

Ipswich has codes for limited Earthmoving,

excessive use of retaining walls and Vegetation Retention. As no details are provided one can only assume that major landscape reshaping will be proposed and thus the proposed extent of clearing and earthmoving would not be acceptable under these codes.

Submission ID 060 and 068

Impact Avoidance Hierarchy – Not able to be assessed

The entire 18.9ha referral area has been denoted the "impact area" – How can the Commonwealth or a member of the public ascertain that the avoidance hierarchy has been followed when the entire area is planned to be cleared? The specific detail of the project development needs to be made known. If the development as a whole in association with the other proposed surrounding developments is not being assessed and declined as a broader action, EPBC 2020/8629 must be required to provide details of the proposed development including which area(s) of native vegetation will be maintained. It is unacceptable to mass clear the entire area and rely **only** on biodiversity offsets as mitigation. There will be significant indirect impacts that are also likely to result that equally cannot be properly assessed until the detail of the development are made known.

Submission ID 007

The impact assessment relies on the proximity of the Greenbank Military Training Area and surrounding conservation lands to justify displacement of fauna from the project sites. This does not avoid or mitigate ecological risk but instead transfers risk to adjacent protected land. Displacement increases competition for resources, intensifies edge effects, and elevates mortality risks, yet no assessment has been provided of the carrying capacity of Greenbank or the cumulative effect of displacement from multiple adjacent developments. Reliance on external conservation areas to absorb displaced fauna is inconsistent with the precautionary principle and fails to demonstrate that the proposed actions will maintain the long-term viability of Matters of National Environmental Significance.

For koalas, reliance on displacement to nearby conservation land as mitigation is unsound, as koalas are highly site-faithful with limited dispersal capacity and the proponent has not assessed local population size, habitat occupancy, or the carrying capacity and accessibility of receiving areas such as the Greenbank Military Training Area, meaning population-level decline cannot be ruled out. In addition, the proposal does not identify any functional, continuous wildlife corridors that would allow koalas or other fauna to safely move between the project area and nearby conservation land, rendering such displacement assumptions unrealistic.

Submission ID 036

Broad scale

30 by 30

The Federal Government has agreed to an international commitment under the Kunming-Montreal Global Biodiversity Framework—a global agreement to stem biodiversity loss—to protecting 30% of Australia's land and sea by 2030. This 30% figure is based on decades of peer-reviewed scientific literature and proposed by experts as being a minimal figure to sustain ecosystems that sustain humans and our economy (>50% of which relies on a functional environment). Australia's National Reserve System, as of 30June2024 covered around 22% of Australia's land, falling 8% short of the 30% figure. The Ipswich City Council region has less than 21% of its land protected, making for the perfect case to purchase the Peninsula Precinct and adjacent parcels making up Woogaroo Forest (which includes the referral area) to create a '**gem of Ipswich.**' How to practically do this is explained in the subsequent section.

The solution: The referral and surrounding land (Woogaroo Forest) could be purchased using **financial offset accounts** (currently sitting at ~$100M in Qld unused) and utilised as a Key Biodiversity Area for threatened species habitat and for a sustainable birdwatching industry, carving out part of the $2.6B birdwatching industry nationally annually. This new parcel of protected estate could be included in the network of conserved areas, also called Other Effective Area-based Conservation Measures (OECMs).

Submission ID 077 and 083



> · Of the 3000 hectares under the SSP less than 12% is earmarked for native habitat conservation, and that includes a QEB easement in the far south of the SSP. **The national conservation area recommended to prevent species extinction by the federal government is 30%. The removal of the Peninsula project portion of Woogaroo Forest within the SSP will ensure that native species already under pressure will be under significantly more pressure – possibly leading to the extinction of several species, including koalas, in the region.** The area now known as Woogaroo Forest is in the north- eastern section of the SSP. Retaining the whole of Woogaroo Forest, some 420 hectares, would **ensure that Springfield City Group met its moral obligations to Australia to conserve 30%** of the 3000 hectares (note that 'green space' can be sporting grounds – not conserved habitat), the remainder of which is largely now fully developed. This would **reduce the chance of native species extinction in the region. Removal of approximately 18.9 hectares of Woogaroo Forest for the Peninsula development is likely to lead to the demise of the resident population of koalas already under pressure. This is not a sustainable outcome and deprives future generations of their natural heritage.**

Submission ID 051

Response to Theme 6

Local scale

Avoidance

The area of vegetation within which the Peninsula Precinct occupies is part of a larger patch of vegetation, which is comprised of a mix of privately owned and Council-owned land. The proposed action will remove 18.9 ha of vegetation within privately owned land which is zoned as 'Town Centre' under the Springfield Structure Plan (SSP) (refer **PD Section 5.1**).

While there will be a reduction in the volume of vegetation as a result of the development of the Peninsula Precinct, these impacts are proposed to be mitigated locally through the retention and rehabilitation of the adjoining Opossum Creek corridor, envisioned under the *Springfield Town Centre North Overarching Master Planning Framework, January 2018* approved by Ipswich City Council on 29 January 2018 (ref: 5593/2017) (refer **PD Sections 4.1 & 4.2**). It is noted the development area was conceptualised through the SSP and is based on an agreed avoidance strategy and tenure agreement with Ipswich City Council as enabled through the SSP and Springfield Town Centre North Overarching Master Planning Framework. The project covers a small footprint in the scheme of the development area under the SSP and results in very little relevant or meaningful opportunity for further avoiding impacts on MNES habitat beyond those already provided and planned for under the Land Use Concept Master Plan. A new plan has been prepared to demonstrate the broader avoidance and extent of the adjoining Opossum Creek environmental corridor relative to adjoining actions (EPBC 2020/8651 and EPBC 2019/8575). Refer to **PD Plan A32, Section 4.2.**

The Opossum Creek corridor exclusion zone which is land earmarked for retention as wildlife corridor will be retained adjoining the development area to the east and north and will result in an intact and contiguous corridor varying in width from 120 and 220 m (refer **PD Plan A1**). While these areas are located outside of the referral area, the boundary of the referral area reflects the developable portion with the remaining areas to be delivered as creek line open space in accordance with local approvals. As part of obtaining local government approvals, there is an expectation that council will require the proponent to manage the rehabilitation of Opossum Creek corridor. Management plans will be developed and submitted for approval

by ICC to maintain and improve habitat within the Opossum Creek corridor including a Rehabilitation Management Plan and Nest Box Management Plan (refer **PD Section 5.4**).

Creek line areas and important tributaries associated with Opossum Creek will be avoided as part of the detailed design aspect of the development (refer **PD Sections 4.1 & 4.2 and Plan A1**). At this stage, the action is limited to a master plan development footprint as the project has not progressed to detailed design phase associated with obtaining local government approvals. Detailed design will contemplate topographical constraints, stormwater and dispersive soils requirements, and setbacks to the adjoining waterway corridor as required by ICC. The Opossum Creek corridor is designated as open space in the *Ipswich City Plan 2025* and ICC will require detailed assessment of how the corridor will be retained and protected as part of obtaining LAP, ADP and OPW approvals approvals. ICC typically require a minimum 40 m setback of development activities from waterway centrelines to protect riparian values and maintain landscape function. Detailed assessment of the adjoining waterway corridor will be required as part of the documentation prepared for the local approval process whereby details of setbacks will be planned and demonstrated.

Mitigation

Mitigation measures proposed as part of the action predominantly include the implementation of measures to reduce the risk of injury to MNES and wildlife more broadly, and to reduce the facilitated and operational impacts of the action. These measures are detailed in **PD Sections 5.1-5.6**. A number of submissions state that proposed mitigation measures do not represent industry best practice (e.g. Submissions 060/068). Measures to mitigate impacts during clearing and construction will utilise industry standard protocols including preparation of a Vegetation Clearing and Fauna Management Plan, Site-based Management Plan, completion of pre-clearance wildlife and drone surveys and supervision by qualified fauna spotter catchers. Some of the concerns relate to the development design including that the design does not include fauna safe movement measures. It is noted the Scenic Precinct will not intersect any areas of retained habitat therefore will note create additional risk to wildlife. Fauna movement sensitive design will be incorporated where practical as part of the development such as fauna/koala awareness signage along esplanade roads (refer **PD Sections 5.5.1 & 5.5.2**).

As part of obtaining local government approvals, there is an expectation that council will require the proponent to manage the rehabilitation of Opossum Creek corridor broadly in line with the proposed areas under this PD. The specifications will be resolved in detail as part of obtaining local approvals. To support this, management plans will be developed and submitted for approval by ICC to maintain and improve habitat within the Opossum Creek corridor (and linear park) including a Rehabilitation Management Plan and Nest Box Management Plan (refer **PD Section 5.4**).

The proposed mitigation measures identified in the PD, specifically those listed under **Section 5.4**, are stated as being anticipated to be required through the local development approval process via conditions imposed by ICC, where relevant to the approved development. Accordingly, while Council does not exercise approval powers under the EPBC Act, it has a role in ensuring the implementation of development-specific mitigation measures through its own statutory planning and development assessment processes.

PD Section 4.1 has been updated to provide clarity on the proposed land uses which includes the following section:



*The adjoining Creek Line Open Space and District Park (Level 2) mapped outside the referral area to the south, east and north of the referral (refer **Plan A32**) is intended to be retained as vegetation and transferred to Ipswich City Council for ownership to form part of the broader open space network that is accessible and responsive to the needs of the local community. Notably, this includes the large area of Eucalyptus grandis (flooded gum) plantation.*

The District Park / Creek Line Open Space adjoining the referral area is to be embellished to a high quality for the benefit of the community in accordance with the following requirements:

- *Retention and enhancement of vegetation values including flooded gums;*
- *Removal of weed species and revegetation with approved and complementary planting;*
- *Provision of embellishment generally in accordance with the requirements and values specified by Ipswich City Council Planning Scheme Policy 3;*
- *Amenities and facilities where required as part of park embellishments shall be selected and positioned with regard to vegetation and topographical and hydrological constraints.*

It is noted that under ICC ownership other infrastructure types may be facilitated as part of the broader delivery of the District Park / Creek Line Open Space, however, will be separate to the Peninsula Precinct action.

Submission 036 raised concern with the reference to nearby conservation areas and bushland reserves such as the Greenbank Military Training Area as absorbing displaced fauna, and additionally that the carrying capacity and ability to safely access these areas is not discussed. In response to this submission, it is noted that the many references made to the provision of foraging resources in nearby areas such as the Greenbank Military Training Area and the White Rock-Spring Mountain Conservation Estate are made in reference to highly mobile MNES including grey-headed flying-fox, swift parrot and regent honeyeater. It is noted that these conservation areas are functionally disconnected from the referral area and broader patch due to the presence of major infrastructure and arterial roads so is not readily accessible by fauna that depend on vegetation and green space for movement (e.g. koala). Highly mobile species likely occupy a broad foraging range of which the referral area is part of potential foraging habitat.

Regarding the koala, the development site is directly connected to vegetation associated with Opossum Creek which regularly exceeds 100 m in width (refer **PD Plan A32**), which forms part of a broader, continuous network of native vegetation within the surrounding landscape. This corridor provides existing habitat, movement pathways and refuge for fauna and is expected to continue to function as such following development. During vegetation clearing fauna would disperse into habitat that is already connected to the site and currently utilised by local populations, rather than being artificially concentrated in a discrete or isolated patch. Given the relatively small proportion of habitat proposed to be cleared in the context of the substantially larger and contiguous surrounding vegetation, it is not anticipated that displaced individuals would exceed the ecological carrying capacity of adjoining habitat or adversely affect the functionality of the existing corridor. Furthermore, clearing would be undertaken in accordance with an approved Vegetation Clearing and Fauna Management Plan and under the supervision of suitably qualified fauna spotter-catchers, enabling fauna to disperse naturally into adjacent habitat and minimising the potential for injury or mortality. The Habitat Connectivity and Sustainability Analysis completed by BAAM specifically in relation to the ability for the koala to persist in the landscape is provided at **PD Attachment A4**. This also acknowledges adjoining impacts from EPBC 2019/8575 and EPBC 2020/8651.

Broad scale

Submissions 051, 077 and 083 expressed concern that the proposal to remove 18.9 ha is in conflict with the national targets for conserving land for biodiversity, specifically the "30 by 30" target. This is a global initiative which seeks to protect 30% of the planet's oceans, lands, and freshwaters by 2030, and has been adopted by a number of nations including Australia.

It is noted that each of these submissions reference the total percentage area of conservation land within the Ipswich local government area and the SSP area more specifically as falling below these targets, however, it should be recognised that the distribution of conservation land is not equal across local government areas (LGAs) as it depends on factors such as size of the LGA, population and historic planning. Additionally, the SSP as a priority development area was conceptualised prior to this target being proposed.

It is important to note that the action has been proposed in accordance with the provisions of the SSP and has been subject to assessment via the relevant legislative pathways being the EPBC Act. While these ideas have merit in the context of shifting environmental targets, it must be noted that the proponent is required to use the legislation and policies in effect which include the EPBC Act and Environmental Offsets Policy. The proposed action is not in conflict with any regulatory pathways.

2.7. Theme 7 – Cumulative Impacts

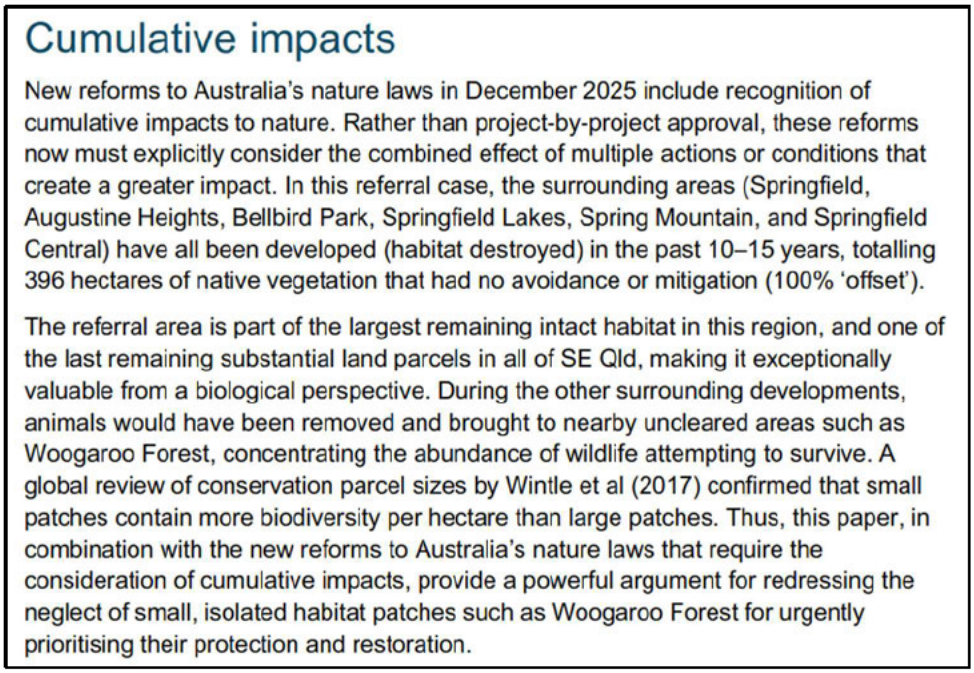
A total of 14 submissions raised concerns around cumulative impacts from other EPBC referral projects, highlighting the need for a broader action assessment. Representative submission extracts are provided below (007 and 077).

Broader Action Assessment
Multiple other developments impacting the same contiguous area of vegetation are proposed, with at least one currently under assessment by Commonwealth government (EPBC 2020/8651). Why these actions were not considered a broader action for cumulative assessment seems inconsistent with the provisions and intent of the EPBC Act. Cumulatively the following EPBC referrals which propose large scale clearing and threatened species habitat loss over Woogaroo Forest should be deemed "unacceptable development" on the basis of the significant impacts to threatened species habitat including the habitat and known occupancy status of critically endangered species.

- EPBC 2020/8651 Scenic Project (by same proponent)
- EPBC 2020/8629 Peninsula Precinct
- EPBC 2019/8575 Springview (village 2/3)

Submission ID 007





Cumulative impacts

New reforms to Australia's nature laws in December 2025 include recognition of cumulative impacts to nature. Rather than project-by-project approval, these reforms now must explicitly consider the combined effect of multiple actions or conditions that create a greater impact. In this referral case, the surrounding areas (Springfield, Augustine Heights, Bellbird Park, Springfield Lakes, Spring Mountain, and Springfield Central) have all been developed (habitat destroyed) in the past 10–15 years, totalling 396 hectares of native vegetation that had no avoidance or mitigation (100% 'offset').

The referral area is part of the largest remaining intact habitat in this region, and one of the last remaining substantial land parcels in all of SE Qld, making it exceptionally valuable from a biological perspective. During the other surrounding developments, animals would have been removed and brought to nearby uncleared areas such as Woogaroo Forest, concentrating the abundance of wildlife attempting to survive. A global review of conservation parcel sizes by Wintle et al (2017) confirmed that small patches contain more biodiversity per hectare than large patches. Thus, this paper, in combination with the new reforms to Australia's nature laws that require the consideration of cumulative impacts, provide a powerful argument for redressing the neglect of small, isolated habitat patches such as Woogaroo Forest for urgently prioritising their protection and restoration.

Submission ID 077

Response to Theme 7

Submissions follow two key thoughts within the broader theme of cumulative impacts. The first is the relationship to the adjoining action (Scenic Precinct EPBC 2020/8651 and EPBC 2019/8575) and whether a broader impact assessment is required or would have material increase impact on MNES. Submitters such as 007 highlight that as the Scenic Precinct and Peninsula Precinct developments are driven by the same proponent, they are required to be assessed as one project. However, while the proponent is the same, these projects are entirely separate. Their relatedness is attributable to their proximity only and do not represent staging as part of a broader development (refer **PD Section 2.4**). Notably, both actions are being assessed under the EPBC Act and significant impacts on MNES are being compensated for in accordance with the EPBC Act Environmental Offsets Policy. Submitter 007 highlights that the impact assessment would be greater if viewing the Scenic and Peninsula Precincts as one project. However, the overall clearing footprint resulting from these as separate projects would not change and therefore the offset requirements are unlikely to increase through viewing as one project.

The second line of thought which is present among submissions (e.g. Submission 077) is that the proposal does not consider the broader clearing impacts that have occurred within the Greater Springfield area and future clearing impacts. These submissions either directly reference or appear to reference the EPBC Act reforms which are progressively being integrated into the Act. One component of the reforms is targeted at addressing regional cumulative impacts through the development of bioregional plans in collaboration with the State government, which will delineate areas of development and 'no-go' zones, however, the application of this is still highly conceptual and has not been refined for practical application for the purpose of regional development.

The ultimate land use and location of indicative impact areas as well as conservation and creek line open space areas have been known for over 20 years. The zoning provisions in the SSP seeks to balance environmental retention with regional development land uses. In line with the vision of the SSP, a functional wildlife corridor will be delivered along Opossum Creek which will be partially facilitated by the action

through the retention of habitat areas within the adjoining Opossum Creek as envisioned under the SSP and associated green space planning strategy.

It is acknowledged that progressive habitat clearing over the past 20 years such as within the areas of Springfield, Bellbird Park and Spring Mountain has resulted in the contraction of habitat areas to linear waterway corridors and the subject habitat patch associated with Woogaroo and Opossum Creek. The SSP contains multiple master-planned development areas (EPBC 2014/7306, EPBC 2016/7676, EPBC 2017/7875 and EPBC 2013/7057) which have been assessed and approved under the EPBC Act for impacts on MNES and have incorporated avoidance and mitigation measures targeted at MNES including the koala and grey-headed flying-fox. Notably, many of the planned corridors within master-planned development areas such as within EPBC 2013/7057 were planned with consideration to koala and fauna generally.

While the development will result in the removal of 18.9 ha of habitat for the koala, grey-headed flying-fox, regent honeyeater and swift parrot, the historical and proposed retention of surrounding vegetated areas in association with Woogaroo Creek, Opossum Creek and O'Dwyer's Gully will retain functional critical habitat connectivity within the landscape and key riparian habitat areas. As discussed above, these impacts have been known since the conceptualisation of the SSP and represents a planned outcome under the SSP which balances retention of habitat areas with development land uses.

In line with the vision of the SSP, a functional wildlife corridor is proposed to be delivered along Opossum and Woogaroo Creeks which will be partially facilitated by the action through the rehabilitation of retained habitat areas within the adjoining Opossum Creek (refer **PD Section 4.2**).

2.8. Theme 8 – Other protected matters

A total of 14 submissions were received which referenced the potential for impacts on other protected matters listed under the EPBC Act. This includes:

- *Grantiella picta* (Painted Honeyeater) – Vulnerable
- *Monarcha trivirgatus* (Spectacled Monarch) – Migratory / Marine
- *Monarcha melanopsis* (Black-faced Monarch) – Migratory / Marine
- *Merops ornatus* (Rainbow Bee-eater) –Marine
- *Rhipidura rufifrons* (Rufous Fantail) –Marine
- *Gossia gonoclada* (Angle-stemmed Myrtle) – Endangered
- *Coleus habrophyllus* – Endangered
- *Petaurus australis australis* (Yellow-bellied glider) – Vulnerable (2 March 2022)
- *Delma torquata* (Collared Delma) – Vulnerable
- *Calyptorhynchus lathami lathami* (South-eastern Glossy Black-cockatoo) – Vulnerable (10 August 2022)

Representative extracts from submissions are provided below.

Other species not listed under the EPBC Act including *Ninox strenua* (Powerful Owl) *Phascogale tapoatafa* (Brush-tailed Phascogale), *Ornithorhynchus anatinus* (Platypus), *Tachyglossus aculeatus* (Short-beaked Echidna), *Chlamydosaurus kingii* (Frilled-neck Lizard), *Adelotus brevis* (Tusked Frog), *Leichhardtia coronata* and *Gossia hillii* were also mentioned among submissions. However, as these species are not listed under the EPBC Act they have not be addressed as part of this response.



2. Threatened Species Present or Likely to Occur
The forest supports a wide range of threatened fauna. Species present or likely to occur include Koalas and Greater Gliders (both Endangered), Brush-tailed Phascogales and Grey-headed Flying Foxes (both Vulnerable), and Platypus, which have suitable habitat within Woogaroo Creek. The area also provides habitat for numerous threatened and migratory birds such as the Powerful Owl, Regent Honeyeater, Swift Parrot, White-throated Needletail, Rufous Fantail, Black-faced Monarch, Spectacled Monarch, Rainbow Bee-eater, and Glossy Black-Cockatoo.

3. Threatened Plants of Botanical Significance
Woogaroo Forest contains dry-rainforest and vine-thicket habitat that supports rare and threatened understory species. The endangered *Coleus habrophyllus* has been confirmed on site, demonstrating the botanical significance of the area. Importantly, the mature eucalypt woodland present is essential for hollow-dependent fauna and forms part of a diminishing and ecologically important vegetation community in South-East Queensland.

Submission ID 095

Another EPBC-listed species highly likely to occur in the referral area is the **Collared Delma (Delma torquata) (Vulnerable, EPBC**). The Collared Delma is the smallest species in the legless lizard (Pygopodidae) family, weighing around 2 grams and reaching total lengths of around 10cm. Endemic to south-east Queensland, with many records found around the western suburbs of Brisbane, and with suitable habitat within the referral area, this species is likely to occur there. Without pitfall trapping survey technique or active rock-turning, this small, semi-fossorial species would never be encountered during walking observation-only surveys through an area, which is what techniques Saunders and Havill group employed during their environmental surveys of the area. The Collared Delma has been found in nearby areas in similar habitat, so there is no reason to suspect they would not occur in the referral area. Being a relatively sedentary species with undoubtedly small home-ranges, many populations live within a 10 x 10m area. The main threat to the species is the destruction or

modification of habitat for urban and agricultural development, with the removal of surface rocks of particular concern- exactly what this development will do, with fauna spotter catchers unable to save and relocate such small and fossorial species during pre-clear surveys.

Submission ID 077

2) The area is mapped habitat for the painted honeyeater (vulnerable status) with known records presented on a grid basis nearby. The mapping on a grid basis may indicate presence of this species within the 18.9ha project impact area

Submission ID 007

Response to Theme 8

A table response to each of the species listed above is provided below. It is noted that four of these species are listed as marine under the EPBC Act and also recognised as migratory due to their inclusion in the Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention). These



species include the Spectacled Monarch and Black-faced Monarch. While listed marine / migratory species are MNES, they are assessed differently to listed threatened and Migratory species. The Rainbow Bee-eater and Rufous Fantail have been removed have both been removed from the Bonn convention and are no longer listed migratory. As the marine environment is not a controlling provision for this project it does not warrant further assessment under the EPBC Act.

These species are highly mobile, migratory or nomadic woodland and forest birds that utilise a broad range of habitats across eastern Australia. While they may occur within the wider region on a seasonal or transient basis, the site does not provide important habitat such as known breeding areas or regionally significant foraging resources. In accordance with the Significant Impact Guidelines, an action is likely to have a significant impact on a listed marine species if it substantially modifies, destroys or isolates important habitat, or disrupts ecologically significant populations. Given the small scale and localised nature of disturbance, any individuals present would be able to readily disperse into the retained Opossum Creek corridor and broader conservation areas in the surrounding locality.



Species	EPBC Act Status	Section of PD	Comments
Grantiella picta (Painted Honeyeater)	Vulnerable	Attachment A3 (Referral Material) – Appendix C p. 6	Submission 006 notes the presence of records nearby. The Painted Honeyeater was considered as part of the broader likelihood of occurrence assessment undertaken as part of the referral. Under species distribution mapping for the species, the referral site is located in the "species may occur" with the "known or likely to occur" range in Queensland occurring inland of the Great Dividing Range (DAWE, 2022). Additionally, the species has a specialised diet, inhabiting mistletoes in eucalypt forests and riparian woodlands of black box (*Eucalyptus largiflorens*) and River Red Gum (*E. camaldulensis*), box-ironbark-yellow gum woodlands, acacia dominated woodlands (DAWE, 2022). Potential habitat is present in the form of eucalypt woodland however; preferred species associations are not present. A review of public database records (i.e., ALA/iNaturalist) did not detect any records within the locality.
Monarcha trivirgatus (Spectacled Monarch)	Marine, Migratory (Bonn Convention)	PD section 3.1, Table A5	The Spectacled Monarch was considered as part of the broader likelihood of occurrence assessment undertaken as part of the referral. The species' primary habitat is comprised of tropical moist lowland forests, subtropical or tropical mangrove forests and subtropical or tropical moist montane forests. The referral area is predominantly comprised of dry sclerophyll forest. Suitable habitat to support the species was not identified within or adjoining the referral area.
Monarcha melanopsis (Black-faced Monarch)	Marine, Migratory (Bonn Convention)	PD section 3.1, Table A5	The Black-faced Monarch was considered as part of the broader likelihood of occurrence assessment undertaken as part of the referral. The species' primary habitat is comprised of semi-deciduous vine thickets, complex notophyll vine forests, tropical (mesophyll) rainforest, subtropical (notophyll)

Species	EPBC Act Status	Section of PD	Comments
			rainforest, mesophyll (broadleaf) thicket/shrubland, warm temperate rainforest, dry (monsoon) rainforest and occasionally cool temperate rainforest. The referral area is predominantly comprised of dry sclerophyll forest therefore suitable habitat to support the species was not identified within or adjoining the referral area.
Merops ornatus (Rainbow Bee-eater)	Marine	PD section 3.1, Table A5	The Rainbow Bee-eater was identified as part of ecological surveys and was detailed in the referral. While the Rainbow Bee-eater is listed as a marine species and is a relatively widespread and common species in Queensland. As the marine environment is not a controlling provision for this project it does not warrant further assessment under the EPBC Act.
Rhipidura rufifrons (Rufous Fantail)	Marine	PD section 3.1, Table A5	The rufous fantail is known to occur and forage within the proposed action site particularly within adjoining major gully lines and rainforest vegetation areas. The species has been observed on multiple occasions through ecological field surveys and is considered relatively common in the surrounding landscape and locality. As the marine environment is not a controlling provision for this project it does not warrant further assessment under the EPBC Act.
Gossia gonoclada (Angle-stemmed Myrtle)	Endangered	PD Section 3.1, Table A5, Section 3.2.5.1	*Gossia gonoclada* has been confirmed to occur adjacent to the proposed action site within rainforest habitat areas associated with Opossum Creek and Woogaroo Creek. Four (4) angle-stemmed myrtle individuals were recorded by the University of Queensland in 2020 and 2021 as part of Myrtle rust surveys of Eastern Australia (Fensham *et al.*, 2021). The records were located along Opossum Creek and Woogaroo Creek within rainforest dominated vegetation, located outside the referral area and adjoining vegetation retention areas proposed as part

Species	EPBC Act Status	Section of PD	Comments
			of the action. One (1) record from the study located along Opossum Creek and dated July 2020 is published on ALA. This species is addressed in further detail in **PD Section 3.2.5.1**.
Coleus habrophyllus	Endangered	PD Table A5 and Section 3.2.5	*Coleus habrophyllus* is known to occur within the locality and specimens of the species were identified as part of ecological surveys adjoining the referral area boundary to the north-west. Submissions state that the species is present within the referral area. It is noted that *Coleus habrophyllus* bares a high level of phenotypic similarity with a related common species *Coleus australis* (syn. *Plectranthus parviflorus*). This species has been recorded within and adjoining the referral area and is considered common within the vegetated areas of Springfield. A review of locations provided aligns with known areas of occurrence of *C. australis* confirmed through ecological surveys completed by SH ecologists (refer **PD Plan A5**). Additionally, while *C. habrophyllus* and *C. australis* are similar in appearance, there are some distinctly different physical characteristics between the two species. *Coleus habrophyllus* are well-documented to have hairy (pubescent) leaves, giving them a velvety texture, and the absence of root balls, which the common species possesses.
Petaurus australis australis (Yellow-bellied glider)	Vulnerable	PD Section 4.9	The Yellow-bellied Glider was listed as a vulnerable under the EPBC Act on 2 March 2022 therefore was not identified as a controlling provision at the time of the referral. The Yellow-bellied Glider has similar habitat requirements to the Greater Glider, however, is notably more sensitive to disturbance. Noting the determination within the PD that the Greater Glider is not considered to be significantly impacted by the action (refer

Species	EPBC Act Status	Section of PD	Comments
			PD Section 4.9), the requirement to separately address the Yellow-bellied Glider is considered unnecessary to this project. In summary, the Yellow-bellied Glider was not a controlling provision at the time of the referral due to its listing in March 2022, and subsequently, the need for formal assessment was not identified as a requirement through correspondence with the DCCEEW.
Delma torquata (Collared Delma)	Vulnerable	PD Section 3.1 Table A5, Section 3.7 and 4.10	The Collared Delma was considered as part of the broader likelihood of occurrence assessment undertaken as part of the referral. Broad vegetation types suitable to support the Collared Delma including open eucalypt woodland occurs within the action area with scattered areas of potential microhabitat. Within the Ipswich region, there is one ALA/iNaturalist record of the species (dated 2023) present within the White Rock Conservation Park, south-west of the project area, however, is noted to be an obfuscated record with a spatial uncertainty of 29.7 km with the grid overlapping parts of Ipswich, Logan and Brisbane city suburbs. Historical surveys for collared delma conducted by ecological consultant groups adjoining the referral area (within EPBC 2019/8575) and Greater Springfield have noted lower quality habitats and no evidence of presence. Connecting habitat areas have been subject to historical fire disturbance with subsequent fragmentation occurring around the site associated with development. A review of records, survey data and disturbance suggest a low likelihood that the species is present within the action area. For

Species	EPBC Act Status	Section of PD	Comments
			greater confirmation, further assessment is provided in PD **Sections 3.3.7 and 4.10**.
Calyptorhynchus lathami lathami (South-eastern Glossy Black-cockatoo)	Vulnerable	Attachment A8	The South-eastern Glossy Black-cockatoo was listed as vulnerable on 10 August 2022 therefore was not identified as a controlling provision at the time of the referral. Following the referral decision, the South-eastern Glossy Black-cockatoo was not raised as a species requiring further assessment due to the lack of suitable habitat. This species forages on *Allocasuarina* and *Casuarina* sp. of which there was recorded to be sparse presence within the site recorded through Modified Habitat Quality Assessment surveys (*Allocasurina littoralis*). Refer to **PD Attachment A8**. The limited presence of *Allocasuarina* sp. suggests limited potential for presence and use, therefore not warranting further detailed assessment.

2.9. Theme 9 – Woogaroo Vine Scrub

A total of 6 submissions were received that cited the potential for impacts on Woogaroo Vine Scrub, citing works of Lloyd Bird. Refer to representative submissions below.

Woogaroo is a Very Significant Vineforest Site:

The importance of Woogaroo Forest (the proposed developed land of these two proposals) as a significant vineforest was identified in 1997 in a conservation assessment of vineforest across Queensland (WWF, 1997). That report noted that 'the number of seriously endangered plant species in the South-East Queensland vineforests is alarming' (page 12).*
At that time, the report noted that the Queensland Department of Environment had been making good progress in conserving vineforests, particularly through converting them to protected areas (page 13). However, it called for greater funding and support for vineforest restoration work, including at Woogaroo Creek (page 26). We strongly urge that this call be picked up again in 2025, to ensure the protection of this fragile and critical area. ***The Woogaroo Vine Scrub is one of only four remaining in SEQ.*** *It is imperative for the conservation of other listed flora species that the Woogaroo forest remains intact, notably:*

Myrtaceae	Gossia gonoclada	Angle-Stemmed Myrtle	CR (NCA) E (EPBC)
Myrtaceae	Gossia hillii	Scaly Myrtle	CR (NCA)
Lamiaceae	Coleus habrophyllus	Shaggy-Leaved Plectranthus	E (NCA) E (EPBC)
Apocynacreae	Leichardtia coronata	Slender Milkvine	V (NCA)

*https://bruceboyes.info/wpcontent/uploads/2012/12/Conservation_of_Vineforests_in_South-East_Queensland.pdf

Critically, there is No Offset for the important remnant of Scrub vegetation or the threatened species of plants at Woogaroo Forest. This needs to be addressed – otherwise, there should not be development of this land/forest.

Submission ID 015

In addition, esteemed botanist Lloyd Bird states "**the Woogaroo Vine Scrub** is one of only four remaining in SEQ." It is imperative for the conservation of other listed flora species that the Woogaroo forest remains intact, notably Scaly Myrtle (Gossia hillii) and Slender Milkvine (Leichardtia coronata) (Vulnerable, NCA)."

Submission ID 077

Response to Theme 9

The "Woogaroo Vine Scrub" refers to a local assemblage of vine forest known to be present adjoining Opossum Creek and Woogaroo Creek. The term "Woogaroo Vine Scrub" is historically derived from its geographic context in relation to the major Woogaroo Creek, recognising its local significance. As a result of agriculture and urban development the extent of the vegetation community has become highly fragmented and disturbed along its historical extent which facilitated a conservation and restoration initiative driven by Lloyd Bird in the late 1990s, as referenced by submission 015.

It is noted that the term "Woogaroo Vine Scrub" does not refer to a formal classification of vegetation community under State and Commonwealth legislation. Under the EPBC Act, it is likely associated with the Lowland Rainforest of Subtropical Australia Threatened Ecological Community (TEC).

The presence of rainforest vegetation which may be described as Lowland Rainforest of Subtropical Australia TEC was assessed as part of the referral and was confirmed not to be present within or adjoining

the referral area as confirmed through a combination of desktop analysis and field verification surveys (**refer PD Section 3.2.4 and Attachment A3 – Section 4.2.2**).

2.10. Theme 10 – Environmental Impacts

A total of 31 submissions cited environmental impacts as a concern, ranging from broad impacts such as greenhouse gas emissions and climate change to local impacts such as altered local climate regulation and altered ecosystem processes. Refer to representative submission extracts below.

Direct and Indirect Greenhouse Gas Impacts
While the proposed project is not an energy generation project, consistent with recent EPBC reform, it is expected that the project provide calculations on:

- The amount of carbon dioxide that will no longer be able to be absorbed by the 18.9ha of vegetation once cleared;
- The volume of carbon otherwise sequested in the soil profile until it is significantly disturbed by the prioposed cut/fill works associated with the project
- The amount of indirect GHG that the project will cause to be emitted through its lifecycle (construction, operation and decommissioning), noting what will likely be considerable use of concrete for foundations, roads and building
- The volume of GHG that will be emitted by construction plant during the construction phase of the project
- The amount of GHG that will be generated via electricity use within the development once operational

Submission ID 007

In this report provided by SCG and Saunders Havill, I do not believe there is mention that they are looking to take off ~14 metres of topsoil to be able to complete this project and the other developments they have planned. Loss of topsoil (especially 14 metres, which is a very large amount for an area such as this) can have significant negative impacts on adjacent already built areas, primarily by compromising the foundational stability, increasing the risk of flooding and/or landslides, and causing infrastructure damage from sedimentation and altered water flows.
This could cause massive impacts to people who are living adjacent to this native forest under threat of clearing/destruction. "It is noted that best practice controls proposed by Springfield City Group go above and beyond mandatory ICC standards". This comment by SCG is vague and does not actually document what environmental impacts there could be from the development of the site or what techniques/practices or measures will be put in place by the group if they were to be successful in their bid to develop the land. This is concerning, as they have not taken into consideration any effects on the landowners and people in communities adjacent to the forest and how it could affect their properties/businesses etc. Measures have been briefly noted for the animals in Table A45, however, as previously stated the proposed developer has not completed adequate and up to date assessments on the animals/land/area with much of their reports being Low Confidence source material, very much out of date and needing updating.

Submission ID 015

There are important aesthetic and environmental quality of life benefits to the broader urban community by the presence of Woogaroo Forest, a large green forested space located in an urban metropolitan area; in terms of improved air quality, noise pollution mitigation and local climatic heat regulation and mitigation. This is especially important with relation to climate change predictions and projected increasing average temperatures, which affect the liveability of towns and cities.

Submission ID 020

New reforms to Australia's nature laws in December 2025 include recognition of damage to critical habitat as an 'unacceptable impact.' Clearing (destroying) of habitat in Lot 163 SP303741 "Peninsula Precinct" that supports all the EPBC listed species undoubtedly constitutes unacceptable impact. Not only will vegetation which supports threatened species be removed, but flooding conditions will be exacerbated by the presence of exposed earth, reducing water absorption into the soil, thereby increasing the volume of flood waters, plus increasing the speed of those waters. Such changed conditions will undoubtedly cause sedimentation build-up in deep pools in the creek ('sand slugs'), removing the resilience of the creeks to a warming climate and extreme temperatures, plus cause erosion of creek banks that irreversibly damage both Woogaroo Creek and Opossum Creek, both of which support the declining **Platypus**, a species of special concern that has been shown to have concerning declines in the past 10 years in SEQ. In addition, once proposed homes are built, impervious surfaces will further increase the severity of flooding into Woogaroo Creek and Opossum Creek by increasing the speed and quantity of water during storms. The severity and frequency of super-cell storms in SEQ make land-clearing and development on slopes in this region, such as the referral area, particularly irresponsible.

Submission ID 077 and 083

Green spaces are also known to have a cooling effect on local areas, whereas houses and bitumen/concrete are known to significantly increase temperatures. With the cost of living crisis and high electricity prices it is very unfair on nearby residents to have to use their air conditioning more to compensate for the increased temperatures created by this development. This extra energy consumption would also contribute to greenhouse gas emissions, pollution, and climate change. For residents who don't have air conditioning or can't afford to use it this increase in temperatures would be terrible and potentially dangerous, especially for elderly people. **I can speak personally on this matter as I have come from the leafy green suburb of Camira to a very hot and barren estate in Spring Mountain where not a single tree was kept. The houses are open to all elements and not enough green spaces were left within the development. It is a sea of roofs and is the reason why we won't be staying in the area for long. People complain about birds making nests on houses because in reality, their homes were destroyed, and they have nowhere else to go.**

Submission ID 018/019/058/059/067/109

9. Site planning should avoid large-scale cut-and-fill

Environmentally responsible development on steep terrain should:

- Retain natural contours where possible
- Minimise cut-and-fill earthworks
- Protect soil layers, hydrology, and drainage patterns
- Limit slope instability and downstream sedimentation, including impacts to local Platypus living in the waterways within and downstream of this forest.
- Preserve underground refuges for fauna
- Protect & effectively re-use topsoil for bushland regeneration

Modern low-impact engineering practices show that steep land can be developed without extensive excavation, limited to 1m cut/fill only where critical. These methods should guide development /clearing requirements and have been implemented for modern projects. Any topsoil disturbed be treated as highly valuable and relocated for bushland regeneration elsewhere, immediately afterwards. Storing of topsoil removes its' ecological value by killing the locally acclimatised & valuable Australian native seed bank contained within and increases risk of contamination.

Submission ID 065



Response to Theme 10

It is acknowledged that under the EPBC Act reforms, a project will now be required to quantify and disclose its carbon emissions impacts. However, the specific implications of carbon emissions have not been specifically considered in this EPBC Act assessment because the project was referred, and the IR assessment was completed, before the EPBC Act reforms introduced requirements to consider carbon emissions.

Under the EPBC Act potential impacts are predominantly considered in terms of their potential for impacts on Matters of National Environmental Significance which have been detailed in **PD Section 4.11.2 Table A48**. Potential construction and operational impacts and measures to mitigate these have been further addressed in **PD Sections 5.6, Tables A50 and A51**.

A number of submissions raised concern with the potential hydrological impact of the development (e.g. Submissions 007, 015, 065). It is noted the action is limited to a master plan development footprint as the project has not progressed to detailed design phase associated with obtaining local government approvals. Detailed design will contemplate topographical constraints, stormwater and dispersive soils requirements, and setbacks to the adjoining waterway corridor as required by ICC (refer **PD Section 4.2**). While the engineering and earthworks specifications are not currently known for this project, hydrological impacts will be managed during clearing and operation in accordance with the requirements of an Area Development Plan approval. This is anticipated to include a Stormwater Management Plan which will be reviewed and approved by ICC and subsequently an Erosion and Sediment Control Plan for implementation during works, and implementation of specific stormwater detention technology to minimise the effects of excess rainwater flowing into catchments caused by the creation of hardstand areas.

The final design will be informed by detailed topographic, geotechnical and engineering investigations to ensure that infrastructure is appropriately integrated with the existing landform. Topographical constraints through the detailed design phase will give rise to specific outcomes in the reconfiguration design, road design, landscaping and stormwater treatment that are responsive to the natural features. This may include development of split level, outlook housing or alternative housing types on lots affected by steeper slopes (e.g. slope >10%) and protecting the existing natural gullies and locating stormwater treatment devices in appropriate locations. It is noted ICC as the assessment manager for development applications within the SSP, will assess the detailed design with regard to how it approaches topographical challenges to ensure potential impacts are managed.

The Opossum Creek corridor is designated as open space under the *Ipswich City Plan 2025* and ICC will require detailed assessment of how the corridor will be retained and protected as part of obtaining ADP and OPW approvals. Additionally, while the project will require the removal of 18.9 ha of vegetation, the adjoining Opossum Creek corridor will be retained and rehabilitated as part of this project as per council requirements. The broader creek line open space corridor comprising the Opossum Creek and Woogaroo Creek and adjoining vegetation areas will be retained as envisioned under the SSP which will be partially facilitated through the delivery of the Peninsula Precinct (refer **PD Figure A9, Plan A1 and Section 4.2**). The preservation and improvement of the broader corridor designated as creek line open space under the SSP will allow for the continued provision of ecosystem functions and local climatic regulation.



In specific response to submission 018/019/058/059/067/109 regarding the increased impact of the urban heat island (UHI) effect resulting from the action, the potential for UHI effects has been considered as part of the development design and broader precinct zoning. Urban heat island effects occur where the replacement of vegetated surfaces with buildings, roads and other hardstand areas results in increased absorption and retention of heat, leading to elevated local temperatures. In this case, the development is situated within a broader landscape that retains extensive vegetated areas, including surrounding open space and waterway corridors, which provide cooling benefits through shading, evapotranspiration and air movement. The retention of these landscape features combined with proposed landscaping and recreational open space areas such as sports fields and parks within the development, will assist in moderating local temperatures and reducing the potential for significant UHI effects (Lin & Li 2025). Given the scale of surrounding green infrastructure and the localised connectivity of vegetated corridors, the UHI effects will be buffered.

2.11. Theme 11 – Offset Suitability

A total of 11 submissions were received which cited the suitability of the proposed offset as a concern.

A summary of the key issues raised include the current absence of existing values to support the MNES being impacted, time lag between reinstatement of habitat values at the offset and removal at the impact site, risk of disease and uncertainty around the mechanism for the protection of the offset land.

A large number of submissions criticised the overall effectiveness of offsets rather than providing specific comment on the material in the PD.

An extract of representative submissions is provided below. Additionally, refer to **Appendix A** of this document for submission 008 (pages 9 and 10).

Project-specific comments

Offsets

The applicants propose planting habitat trees on degraded grazing and cropping land in the Scenic Rim as an 'offset' to compensate for the loss of habitat for koalas and the other endangered species, which will be caused by their proposal. The proposal claims that 90% of the trees to be planted will survive to maturity, which is a very high claim, particularly with increasing likelihood of bush fires and droughts due to climate change.

The proposal also says that "the offset area would not be protected in perpetuity for conservation purposes". I understand that there is mounting evidence of the ineffectiveness of offsets to achieve their desired purpose of creating enduring replacement habitat for affected species. I also understand that this type of offset will no longer be allowed under the new environmental legislation that passed the parliament recently.

Submission ID 009

This project is scheduled to commence in Q4 2026 (Preliminary Documentation Report, Saunders Havill Group 2025, p. 11), According to the submitted Offset Management Plan (Attachment A8, pg 212) the proposed offset site will only become 'mappable as Core Koala Bushland [..] within 12 -15 years of planting". Assuming that planting begins at the same time as the project. This leaves an unacceptably large gap between loss of key koala habitat and suitable replacement habitat. From which the population may not recover.

Submission ID 064

5. Heavy reliance on offsets highlights ongoing significant impacts

Offsets are presented as the primary means of addressing impacts to MNES. The proposed offset area of 41.3 hectares consists largely of revegetation on land that has previously been cleared and used as paddock.

The predicted offset outcomes are based on modelled habitat improvements over a 20-year timeframe. However, the EPBC Environmental Offsets Policy requires offsets to be like-for-like, genuinely additional, and not used to compensate for a failure to avoid clearing critical habitat.

2

Revegetation of cleared land does not replicate the ecological function of existing mature remnant habitat. On this basis, the proposed offsets do not meet the requirements of the EPBC Offsets Policy (2012) and cannot reasonably be relied upon to justify the impacts.

Submission ID 078

6. Non-Compliance with the EPBC Environmental Offsets Policy

Offsets proposed or foreshadowed for the Peninsula Precinct:

- Do not compensate for the permanent loss of habitat critical to survival;
- Rely on long-term revegetation with high uncertainty and time-lag risk; and
- Do not account for cumulative offset dependency across multiple developments competing for the same offset resources.

The Offsets Policy explicitly states that offsets must not be used to allow otherwise unacceptable impacts, particularly where critical habitat is concerned.

Submission ID 036

One of the significant impact criteria for critically endangered species is whether there is a real chance or possibility of introducing disease that may cause the species to decline. The report produced by Saunders Havill is that proposing that the offset vegetation be on a working poultry farm. Two of the aforementioned critically endangered species, the Regent Honeyeater and Swift Parrot, are birds, which is concerning since there are many reports of diseases, such as avian flu, crossing the boundary between wild birds and poultry (Beato & Capua 2011; Brown & Bevins 2017; Blagodatski et al. 2021).

Submission ID 021



I note Springfield proposes offsets for impacts to Koala and Grey-headed Flying Fox habitat, and loss of 'habitat features' for the Swift Parrot and Regent Honeyeater. The following are comments relevant to the Preliminary Documentation (**PD**) for both actions.

1. It is my understanding **Voluntary Declarations** (**VDec**) may not be in-perpetuity, and that they can be revoked once the offset site achieves remnant status and is 'protected' under the *Vegetation Management Act 1999*. Relevantly, Queensland Givernment Guidance states:

   > *If there is evidence that the VDec can be ended* (e.g. because the management outcomes of the management plan have been achieved), *the chief executive must provide a written notice to the owner of the land subject to the declaration*.

   Revoking the VDec would enable threatening processes to return to the offset site, reducing habitat quality, and the site no longer providing an offset. How will the offset outcomes/completion criteria be conserved for the duration of the impact (i.e. in-perpetuity)?

Submission ID 113

Broad critique of offsets

Environmental Offsets

The proposed **Environmental Offsets** for impacts to critical habitat by the Springfield City Group (SCG) will be resolved by providing an environmental offset on land external to the site via a third party offset provider.

Reliance on offsets is unacceptable: past offsets have failed to deliver recovery, and the proposed offset site (Moorang Lane, 50 km away) is ecologically unsuitable. Recent peer-reviewed research by Tran & Maron (2024, University of Queensland) found that most biodiversity offsets for koalas are unlikely to fully counterbalance habitat losses. The study identified overestimated benefits, double-counting, and poor transparency as common issues. On average, only 55% of impacts were offset, and only 2 out of 14 projects fully offset their impacts (Tran & Maron, 2024).

The Queensland Government's Environmental Offsets Policy requires three new koala habitat trees for every non-juvenile tree removed, but the offset must be in the same local government area and ecologically similar (Qld Gov Fact Sheet). However, government guidance notes that even small areas of habitat loss (as little as 1 hectare) can have a significant impact on the endangered koala, and that offsets should only be considered after all avoidance and mitigation options are exhausted (DCCEEW Referral Guidance).

The Australian Conservation Foundation and other experts have called the current offset system a "total failure," with more koala habitat approved for destruction in 2025 than ever before, despite the species' endangered status (SBS News).

The cumulative effect of past and proposed clearings in Springfield is pushing local ecosystems beyond recovery thresholds.

SCG proposal to rehabilitate the adjoining Opossum Creek corridor the referral area which will serve to retain and improve functional connectivity within this area. The SCG rehabilitation commitment can be judged by the progress of revegetation of the approximately 1 kilometre by 40-to 50-Metre-wide sewer pipeline clearing done several years ago, this area is now part of the proposed vegetation corridor to be set aside with much of the trees such as Blue Gum and Grey Ironbark koala food removed.

Submission ID 062



3. Failure to Avoid or Mitigate Environmental Harm

The proposal involves total vegetation removal, with no avoidance or mitigation measures. There is no koala-sensitive design, nor use of relevant state or national biodiversity policies. SCG's plan to provide an environmental offset 50 km away is unacceptable and ecologically unsuitable. Research shows that most biodiversity offsets for koalas fail to fully counterbalance habitat losses, with only 55% of impacts offset on average.

Offsets must be local and ecologically similar and should only be considered after all avoidance and mitigation options are exhausted. The current offset system is failing, with more koala habitat approved for destruction in 2025 than ever before.

Submission ID 042

- **Biodiversity Offsets:** Reliance on biodiversity offsets has proven costly and often ineffective. Offsets require significant financial investment, yet they rarely achieve true ecological equivalence, leading to net biodiversity loss and increased future costs for restoration and species recovery. [nespthreat...ies.edu.au]

Submission ID 048

Response to Theme 11

1.0 Project-specific comments

1.1 Habitat for MNES

Submission 078 states that the offset is unsuitable on the basis that it does not contain similar values to the offset area being impacted. The proposed offset area (ROA 3) is 41.3 hectares (ha) in size and is located within the Rosevale Offset Property (refer **PD Section 6.2**). The proposed offset area is comprised of degraded grazing land which is proposed to be rehabilitated in accordance with the pre-clear regional ecosystem to create habitat for MNES where it is currently lacking (refer **PD Section 6.4**).

The offset site has been assessed closely by DCCEEW and factors such as the current and potential future utilisation of the offset site by MNES was considered. It is noted that land-based offsets that proposed to restore habitat and connectivity are preferred over retaining and securing areas of existing habitat. The proposed offset follows the DCCEEW's preference for habitat creation. 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, grey-headed flying-fox, swift parrot and regent honeyeater. Notably, the offset area has been identified as suitable for planting with mugga ironbarks (*Eucalyptus sideroxylon*) based on pre-clear regional ecosystem mapping. The inclusion of mugga ironbarks in the planting palette will provide preferred foraging resources for the regent honeyeater and swift parrot.

The offset proposal and Offset Management Plan (OMP) prepared for the project demonstrates how measurable increases in habitat value for each MNES can be achieved (refer **PD Attachment A9**). Notably, the 41.3 ha offset area is part of a broader offset property totalling over 800 ha which will deliver offsets for a range of species including the koala, grey-headed flying-fox, swift parrot and regent honeyeater. The location of the offset within the broader offset property will provide added benefit to the MNES through a coordinated and cumulative offset approach and outcome.



Further an assessment against the EPBC Act Environmental Offsets Policy is provided in **PD Section 6.5, Tale A58**.

1.2 Distance to impact site

Several submissions note the distance of the offset site to the impact site as cause for concern. 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. The offset, as required under the EPBC Act Environmental Offsets Policy, will compensate for impacts to the MNES being significantly impacted. The offset site has been approved by DCCEEW as part of the assessment process. Additionally, the offset was assessed closely by DCCEEW and factors such as the current and potential future utilisation of the offset site by MNES was considered. 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 to provide preferred habitat values for the koala, grey-headed flying-fox, swift parrot and regent honeyeater.

1.3 Time-lag

Submissions 009, 064 and 036 identify time-lag between the development site impacts and offset improvement as their primary concern. between the time when the development site is impacted and the offset area reaching a state where it is useable by MNES or similar in value to the impact site. A lag in the delivery of habitat values within the offset area is unavoidable noting the requirement for planting which includes an establishment phase, however, there are provisions within the OMP to reduce this period of time. This includes an accelerated planting program which will see broadscale planting occurring in the second year of the offset after seed propagation (refer **PD Attachment A9, Table 4, p. 33**) and a detailed monitoring program which will allow for the rapid identification of any issues requiring rectification that might slow or impede the offset recovery.

Submission 064 specifically references the statement that the offset area is not expected to become mapped as Core Koala Habitat by the State government until 12-15 years after the offset commences. However, this point was meant to illustrate how revegetation will translate into tangible changes in mapping at the State level, not the point in which benefits for koala will be realised. Detailed habitat quality gain tables for the koala and grey-headed flying-fox are provided at **PD Attachment A9 – Appendix A** which demonstrate the projected increased in habitat quality over the life the offset.

The only alternative mechanism to fully avoid or mitigate a time-lag effect is through the use of an advanced offset. An advanced offset is a type of offset where conservation actions are undertaken before a specific impact is approved. Advanced offsets have historically been difficult to apply in the offset framework as they carry risk and uncertainty for regulators and proponents. For example, pre-established offset sites may not align precisely with the MNES being impacted, cannot be clearly attributed to a particular project or may not meet like-for-like requirements at the time of assessment. As a result, project-specific offsets secured and assessed alongside the impact are generally favoured by proponents and regulators, where equivalence, timing, and long-term management obligations can be more clearly defined.



1.4 Protection mechanism

Multiple submissions cite concerns regarding the proposed protection mechanism to legally secure the offset area and the effectiveness of the mechanism as an enduring form of protection.

Submission 009 references a statement that "the offset area would not be protected in perpetuity for conservation purposes." This statement is extracted from **PD Table A58, p. 253** and is in relation that the requirements of the proposed development outside of the EPBC Act. The broader context of this statement is that under State or Local legislation an offset would not be required and would not be required to be protected in perpetuity. For clarity, the offset area is proposed to be protected in perpetuity via a suitable mechanism determined by the agency (refer **PD Table A58, p. 253**).

Submission 113 raised concern that Voluntary Declaration as a protection mechanism may be revoked and therefore does not provide a reliable mechanism for securing an offset area. While it is correct that Voluntary Declarations are not perpetual in all circumstances, their effectiveness should be considered in the context of how they are applied and conditioned under the EPBC Act. Where a Voluntary Declaration is used to secure an offset, it is accompanied by legally binding conditions of approval that require the offset to be maintained for the duration specified in the approval and OMP, being in perpetuity. In these cases, revocation would generally require agreement from the Commonwealth Minister or delegate, particularly where doing so would result in a breach of approval conditions. Notwithstanding this, a covenant is now proposed to be completed as a secondary protection mechanism per the agency's request. This update is reflected in **Section 6.2.1 and 6.5 of the PD** and **Section 2, Table 4 of the OMP**.

1.5 Disease

Submission 021 cites concern around the potential introduction of disease to MNES at the offset site as a result of the active poultry farm. The offset property is currently utilised as a poultry farm which has a stringent biosecurity protocol in place, centring mostly around disease control (refer **PD Table A59, p. 266**). With the active biosecurity program, any instance of avian disease would be identified and limited to the controlled environment of the poultry farm. The likelihood of transmitting disease to a swift parrot or regent honeyeater directly through the poultry farm is considered to be very low.

1.6 Planting survival rate

Submission 009 states "The proposal claims that 90% of the trees to be planted will survive to maturity, which is a very high claim, particularly with increasing likelihood of bushfires and droughts due to climate change." The 90% survival rate is supported by a detailed Rehabilitation Management Plan which includes a rigorous monitoring schedule, performance indicators and corrective action where the survival rate is observed to be lower than 90%. The OMP includes an assessment of risks and consideration of external factors that may affect the performance of the offset which have bene accounted for within the adaptive management framework.

2.0 Broad critique of offsets

Concerns have been raised regarding the use of offsets, highlighting general effectiveness as a key reason (submissions 042/048/062). It is acknowledged that there is emerging data that illustrates the implementation and delivery of offsets and their associated outcomes is not consistent across projects.

However, it is important to note that environmental offsets are an established and integral component of the assessment and approval framework under the EPBC Act. The use of offsets is guided by the EPBC Act Environmental Offsets Policy, which sets out a consistent, transparent, and scientifically grounded



approach to determining when offsets are appropriate and how they must be designed and is required to be applied under the Act. As such, the use of offsets in this project is not discretionary but reflects a requirement to apply the EPBC Act framework in full, ensuring that any residual significant impacts are appropriately compensated in accordance with established Commonwealth policy.

The EPBC Act reforms which are being progressively integrated into the Act seek to change the way offsets are calculated, delivered and enforced. While the proposal is not subject some of these changes to the offset framework, the offset will be subject to stronger compliance monitoring enacted through the reforms through the Commonwealth Environmental Protection Agency.

The proposed land-based offset will result in measurable improvement in habitat quality for by securing and enhancing large areas of existing and degraded habitat areas that presently and in the future through management, will support key ecological requirements of the koala, grey-headed flying-fox, swift parrot and regent honeyeater. This includes the provision and recruitment of foraging habitat, reducing threats, improving understorey conditions through weed management and reconnecting fragmented habitat and movement corridors. These actions are consistent with established understanding of habitat requirements for each MNES and are designed to deliver a long-term benefit relative to the counterfactual scenario.

Additionally, a rigorous monitoring framework is proposed to be implemented under the OMP (refer **PD Attachment A9**) and associated Rehabilitation Management Plan which will allow for the offset program to be carefully monitored and provide a pathway for adaptive management.

As a result, the proposal to offset impacts as a result of the action through the delivery of the land-based offset will provide measurable value to the MNES being impacted during the course of the offset program implementation and is considered in keeping with the intent of the EPBC Act Environmental Offsets Policy.

2.12. Theme 12 – Adequacy of Survey Effort

A total of five submissions highlighted adequacy and relevance of survey effort as a concern, particularly for certain species addressed for impacts within the PD. Two of these submissions also cited the adequacy of reporting as a primary concern. An extract of representative submissions is provided below.

> ***I believe that the developers need to present more appropriate and non-bias surveys, as the ones provided are not recent enough to be relied on, and I believe that surveys should be undertaken by the Government, not the developers themselves. The Australian Government has recently said they will have greater protections for Native Forests - this needs to be consolidated through action in not allowing these proposed projects to go ahead. Especially when the developer is not allowing access or allowing transparency of what is actually in the forest at this current time in 2025.***

Submission ID 015

> 1. There are major concerns that the Springfield City Group and Saunders Havill are relying on what scientists and EPBC personnel would say is "Low confidence" source information/data throughout their report and their application. It is greatly important to have a rating of the currency, accuracy and reliability of any sources of information – **the fact that source information is greater than 5 years old would mean this information is a Low level of confidence of source information**.

2. Anthochaera phrygia (Regent Honeyeater), it is noted from SCG and Saunders Havill about sightings of this bird in 2019. An important question is, have there been any surveys completed for this extremely significant bird species? Most of the information about the Regent Honeyeater in section 3.3.2 is anecdotal and there are no quantifications or studies to show whether there are populations. Studies need to be undertaken at the site for birdlife, not just relying upon media/news or hearsay. I personally have seen Regent Honeyeaters in Camira and Collingwood Park, not too far from the proposed developments of this forest area. The information provided by SCG once again has not been sought out or presented appropriately by this potential developer. Therefore, more information is needing to be sought – and the application to develop I suggest this application by the potential developer to be rejected.
   Also, it must be noted that the fact that this land is patrolled by the owners and everyday people do not have ready access to look for birds in this area, it is not uncommon for there to be a lack of data in areas which there has been censorship of people being able to access areas to birdwatch/view potential endangered species.

3. White-throated Needletail (Hirundapus caudacutus), once again surveys were completed approximately 5 yrs ago (Jan 2021) and shouldn't be completely relied upon. The fact that 15 individuals were able to be counted in a sighting during a survey, but that they could not be identified is peculiar. If there was a flock of 15 individuals and they were likely noted to be this bird "It was noted that the birds were quite large and had a square-shape tail which is a characteristic feature of the White-throated Needletail" from the evidence beyond reasonable doubt this species is present in this forest and area. It has also been regularly sighted by people who attend the Dog Park in Brookwater, QLD.
   This species is present in the forest, and clearing of its native habitat would lead to massive damage to the ecosystem and the species.

Submission ID 015

5. Inadequate Assessment of Threatened and Migratory Species

The documentation reveals survey limitations and evidentiary gaps, particularly for:

- Regent Honeyeater (critically endangered), where flowering-dependent surveys may not align with national guidelines; and
- White-throated Needletail, where suitable habitat is acknowledged but impacts are discounted without precautionary assessment.

Under the precautionary principle in the EPBC Act, uncertainty must weigh against approval, not in favour of it.

Submission ID 036



> Another EPBC-listed species highly likely to occur in the referral area is the **Collared Delma (Delma torquata) (Vulnerable, EPBC**). The Collared Delma is the smallest species in the legless lizard (Pygopodidae) family, weighing around 2 grams and reaching total lengths of around 10cm. Endemic to south-east Queensland, with many records found around the western suburbs of Brisbane, and with suitable habitat within the referral area, this species is likely to occur there. Without pitfall trapping survey technique or active rock-turning, this small, semi-fossorial species would never be encountered during walking observation-only surveys through an area, which is what techniques Saunders and Havill group employed during their environmental surveys of the area. The Collared Delma has been found in nearby areas in similar habitat, so there is no reason to suspect they would not occur in the referral area. Being a relatively sedentary species with undoubtedly small home-ranges, many populations live within a 10 x 10m area. The main threat to the species is the destruction or
>
> modification of habitat for urban and agricultural development, with the removal of surface rocks of particular concern- exactly what this development will do, with fauna spotter catchers unable to save and relocate such small and fossorial species during pre-clear surveys.

Submission ID 077

Response to Theme 12

Koala, grey-headed flying-fox and bird species

Ecological surveys to assess habitat quality for MNES and targeted surveys for presence of particular MNES have been completed within the referral area from 2020 to 2023 (refer **PD Section 3.4.3**).

The original surveys were conducted using appropriate seasonal timing, methods, and survey effort consistent with best practice, and therefore provide a reliable baseline of ecological conditions.

Surveys targeting species presence were used for specific species including the koala, grey-headed flying-fox, greater glider and white-throated needletail. These surveys were conducted using appropriate seasonal timing, methods, and survey effort (refer **PD Sections 3.3.3 – 3.3.6**). While surveys to target species presence add value to ecological assessments, particularly where presence is confirmed, under the precautionary principle, potential presence cannot be discounted where presence is not confirmed.

Submission 015 notes that detailed presence surveys were not completed for the regent honeyeater. However, in the case of species such as the regent honeyeater and swift parrot which are considered relatively cryptic or transient and have limited windows for presence in Queensland, targeted surveys are not a reliable means of confirming potential usage of a site. Moreover, reliance on presence/absence data for highly transient and mobile species may lead to an underestimation of potential usage.

The assessment and quantification of impacts was determined through the presence of habitat values to support the MNES and consideration of the species' movement and usage patterns and disturbance ecology rather than targeted surveys alone.

While there is potential for the white-throated needletail to use the vegetation within the site, white-throated needletails are highly mobile and almost exclusively aerial including while foraging, and are

unlikely to focus solely on one area of habitat. Large areas of potential foraging and roosting habitat are located within the nearby protected areas including White Rock Conservation Area, White Rock-Spring Mountain Conservation Estate and Greenbank Military Training Area. Assessment against the Significant Impact Guidelines indicates a significant impact on this species is unlikely (refer **PD Section 4.6.1, Table A39**).

Collared delma

A review of the potential for collared delma to occur within the referral area has been completed. Additionally, the areas surrounding the referral area have been subject to targeted surveys for habitat and presence which have been drawn upon to understand patters of usage within the broader habitat patch and Greater Springfield.

Survey guidelines generally agree that optimal survey timing is during the spring or broadly from September to late March when conditions are warm and maximum temperatures are greater than 25°C (DCCEEW, 2023; DSEWPaC 2011), therefore timing of the surveys being autumn is considered appropriate. Active searching is generally considered more effective at locating the species than other methods such as pitfall trapping based on multiple studies (DSEWPaC, 2011). A minimum of three survey days incorporating repeat surveys is recommended as a minimum survey effort (DCCEEW, 2026).

Cardno completed an extensive collared delma survey within the broader habitat patch north of the referral area in 2014 as part of assessments for EPBC 2014/7306 (within the EPBC 2019/8575 referral area) which included identification and delineation of potential microhabitat, and completion of active searches and pitfall trapping to detect presence (Cardno, 2014). Despite the presence of microhabitat attributes, no collared delmas were detected as part of these surveys.

There is an element of repeatability with surveys completed with surveys completed by another consultant group in other areas of Springfield in the year prior. Targeted Collared Delma surveys were completed by Austecology in 2013 across a 300-ha study area as part of ecological assessments completed for the masterplanned development Springfield Rise (EPBC 2013/7057) which similarly did not detect the species with the assessment concluding that microhabitats were of a low quality (Austecology, 2013).

The surveys conducted by Cardno (2014) within the EPBC 2019/8575 area utilised a combination of pitfall trapping and active searching methods including turning over logs and rocks, lifting loose bark, investigating hollow logs and disturbing leaf litter for a period of 15 search hours in March/April 2014 over four days. The Austecology study in Spring Mountain was completed in the previous year in April 2013 and included hand searches and rock-turning at 15 microhabitat sites across the 300-ha study area over a 21-day survey period. It is noted five of these sites were affected by a fire event in October 2012.

Despite these surveys occurring in 2013 and 2014, they provide a relevant overview of patterns of occurrence and microhabitat distribution in the locality and continue to be relevant where considering the species' known dispersal limitations and strong site fidelity. Both the Cardno and Austecology reports are publicly available via the EPBC Act Public Portal.

Additionally, surveys for potential microhabitat characteristics within and adjoining the referral area have been undertaken as part of ecological ground-truthing and meander surveys with a particular focus on areas of sloping terrain which are a key component of the habitat for the species. Microhabitat attributes surveyed for included exposed embedded rocks, scattered un-embedded surface rocks, presence and



density of leaf litter, coarse woody debris, native grasses and sedges, and orientation of the slope. The entire referral area adjoining areas were traversed as part of these surveys. Suitable microhabitat was not found to be present within the referral area or immediate surrounding areas. The surrounding areas are notably highly disturbed with Brookwater Golf Course to the west, flooded gum plantation to the east and weed infested areas dominated by *Celtis sinensis* and *Pinus sp.* to the north (refer **PD Plan A30**).

The referral area and immediate surrounding areas lack rocky sloping terrain that allow the formation of distinct microhabitat attributes that the collared delma requires. Large areas of historical modification including ground layer disturbance are present within the referral area (refer **Plan A30**), creating a whipstick regrowth quality and simplified ground layer structure that contains minimal presence of key microhabitat attributes such as scattered surface rocks.

For further details of the surveys completed, adequacy and findings, please refer to **PD Section 3.3.7** and **Section 4.10**.

Confidence in data

The following statement by submission 018 is noted: "the fact that source information is greater than 5 years old would mean this information is a Low level of confidence of source information."

While some field surveys were undertaken more than five years ago, their continued relevance has been carefully reviewed. The habitats within the study area have remained largely unchanged since the time of survey, with no substantial disturbance, land use change, or ecological degradation that would materially alter species presence or habitat values, therefore provide a reliable baseline of habitat quality.

Where necessary, these data have been supplemented with more recent desktop assessments, database reviews, and targeted field verification (*i.e.,* surveys in 2023) to confirm that conditions remain consistent. Accordingly, the survey information is considered current and fit-for-purpose for assessing potential impacts to the MNES.

2.13. Theme 13 – Habitat Quality Assessment Method

One submission was received which specifically addressed the method for assessing habitat quality at the impact and offset site and quantifying impacts on MNES. Submission 113 outlines the submitter's concerns that the offset may not adequately compensate for impacts on protected matters as the Offset Management Plan (OMP) has not:

- justified the core indicator weightings used to score habitat quality;
- justified the factors and weighting used to score core indicators;
- accounted for additionality;
- addressed scientific uncertainty;
- given confidence in confidence in result; and
- demonstrated the suitability of the securing mechanism.

This section has been structured slightly differently to the preceding sections to provide submission extract followed by a response.

Comment – Site condition parameters



> **2.** Regarding **habitat quality assessments**, the Guide states:
>
> *It is important to note that the assessment of quality for threatened species habitat and ecological communities is not simply a scoring of vegetation 'pristineness'.*
>
> Assessment of the impact and offset sites includes assessment of regional ecosystem values, relative to benchmark values (~*pristineness*), that are not relevant to the ecological requirements of the protected matters. For example, I would suggest *coarse woody debris*, *organic litter* and the presence/density of *non-perennial ground layer species* are not relevant to Koala and GHFF habitat value. I am therefore concerned that accounting for regional ecosystem values means Springfield has over-estimated the Koala and GHFF future habitat quality.

Submission ID 003

Response to Comment – Site condition parameters

While the comment references GHFF, it is assumed it applies only to koala as the GHFF site condition assessment method does not use any of the parameters identified.

The site parameters listed are taken from the Queensland State Government's *'Guide to determining terrestrial habitat quality: A toolkit for assessing land based offsets under the Queensland Environmental Offsets Policy'* Version 1.2 which utilises several attributes and assessment methods from the BioCondition Assessment Manual v2.2 (Eyre et al 2015). Although koalas are predominantly arboreal, ground-layer attributes such as coarse woody debris, organic litter and ground-layer vegetation contribute meaningfully to the general functionality of the habitat by influencing factors such as movement behaviour, thermoregulation, soil condition, forest productivity and long-term food tree viability.

It is agreed that while these attributes play a part in general habitat functionality they do not provide as much benefit to koala as features such as foraging species. This is reflected by the weightings embedded in the habitat quality assessment where attributes relating to understorey conditions, such as those identified in the comments and shrub and grass species richness, only account for 35 of the possible maximum score of 100 for site condition. This is approximately 10% of the overall habitat quality score, which is considered appropriate.



Comment – Scientific uncertainty

> 3. The offset proposal must inform decision-making by the Minister or delegate, including adequately addressing **scientific uncertainty**. Relevantly, Principle 9 of the Policy states:
>
> *In assessing the suitability of an offset, government decision-making will be informed by scientifically robust information and incorporate the precautionary principle in the absence of scientific certainty.*
>
> The PD provides little or no *scientifically robust*[1] *information* to help assess the suitability of the offset proposal. The PD also fails to identify the sources of scientific uncertainty, and outline the consequences of that uncertainty to delivering its offset proposals. For example, scientific uncertainty related to applying MHQA scoring, claimed effectiveness of management actions to achieve timebound MHQA scores, and monitoring and analysis activities to detect change in a timely manner, are not discussed. It is therefore unclear how a precautionary approach, for example applying *margins of safety* to individual process judgements or decisions, compensates for that uncertainty. In this regard, I

Submission ID 003

Response to Comment – Scientific uncertainty

The projected habitat quality gains detailed in the OMP are not just opinion-based – they utilise industry best practice standards for ecological restoration. Specifically, proposed management actions are taken from the South East Queensland Ecological Restoration Framework (SEQERF), which was developed using substantial research of rehabilitation projects in South East Queensland. The SEQERF has been endorsed and adopted by the majority of local and state government entities in the region.

Uncertainty is also managed through analysis of risks for each management action which is provided at **Section 9 of the OMP**.

To further support the scientific rigour associated with implementation of the offset a review has been carried out on studies assessing the success of koala habitat restoration. The following passage has been added to **Section 6 (p. 158) of the OMP**.

A range of recent studies demonstrate that rehabilitation of disturbed land can successfully provide functional habitat for koalas when rehabilitation is appropriately designed and implemented.

Cristescu et al. (2013) investigated koala use of post-mining rehabilitated areas on North Stradbroke Island and found that koalas actively re-occupied rehabilitated sites less than 15 years old. Individuals using rehabilitated areas accessed suitable food and roost trees, exhibited good body condition, and demonstrated high reproductive output, with no discernible difference in predation when compared to adjacent undisturbed habitats. The study concluded that rehabilitated sites were capable of providing habitat comparable to undisturbed environments.

Other studies support these findings. FitzGibbon et al. (2012) recorded koala recolonisation of rehabilitated mine landscapes in central Queensland, identifying availability of suitable food tree species and proximity to existing koala populations as key determinants of successful habitat use. Where these elements were present, rehabilitated areas were utilised by koalas.



Guidance for revegetating koala habitat developed by the Australian National University (Beale et al. 2022) carried out a review of peer-reviewed literature finding that rehabilitated habitats can contribute meaningfully to koala conservation where revegetation incorporates preferred food tree species, sufficient structural complexity, and landscape connectivity.

Overall, the available scientific evidence demonstrates that rehabilitation of disturbed areas can provide suitable koala habitat, provided that rehabilitation targets species composition, structure and connectivity consistent with koala ecology.

Comment – MHQA Species habitat index

4. Related to the MHQA, the PD states:

> *In developing the MHQA to better incorporate MNES, two (2) species habitat index characteristics, being, (1) quality and availability of food and foraging habitat, and (2) quality and availability of shelter have been added to the site condition indicator.*

While this seems reasonable, was including these **species habitat index characteristics** in the HQA subject to independent expert review, and did it have regard for the operation of other site condition related indicators? I am therefore concerned that:

- increased number and complexity of quality indicators, and the potential for double counting cause-effect relationships; and
- the range of scores and undocumented/unjustified judgements required by industry and decision-makers:

is inefficient, reduces transparency and robustness, prejudices consistent practice, and deviates from the goal of quality comparisons on a scale of 0-10.

Submission ID 113

Response to Comment – MHQA Species habitat index

The MHQA method was subject to peer reviewing and was signed off by the department as suitable for assessing habitat quality for the koala.

Comment – Confidence in result

5. Confidence in result for habitat quality raw gain. The offset documents claim 85% confidence in result for all assessment units because this level of confidence *is supported by a detailed Rehabilitation Management Plan developed for the offset area*.

I would contend that confidence in result is not based on the presence of a comprehensive and/or purportedly adaptive implementation plan, but rather on technical memoranda and peer reviewed scientific papers demonstrating attainment of condition, context and stocking rates outcomes from 'like' offset sites, and the use of precautionary '*margins of safety*' in decision-making.

I suggest the confidence in result be selected using a framework such as the Intergovernmental Panel on Climate Change's (IPCC) July 2010 Guidance Note on Consistent Treatment of Uncertainties, particularly the Agreement/Evidence matrix in Figure 1 of the guidance.

Submission ID 113



Response to Comment – Confidence in result

This comment is similar to the previous one on scientific uncertainty as it requests additional evidence to support the outcomes proposed by the OMP. As identified in the response to that comment, significant peer review data exists demonstrating koalas will utilise rehabilitated areas subject to appropriate design such as the use of preferred foraging species.

In addition to koala, multiple studies have shown that flying-foxes (including GHFF) routinely forage in human-modified and restored environments, including revegetated landscapes, provided that appropriate food resources are present.

Yabsley et al. (2021) demonstrated that GHFF extensively utilise human-modified landscapes, including revegetated areas and planted vegetation, where flowering and fruiting resources are available. The study found that habitat usage by GHFF was more strongly related to resource distribution and quality than to land-use category, indicating that restored habitats can function effectively as foraging habitat once larger forage trees are established.

Similarly, McConkey and Drake (2015) and Markus and Hall (2004) showed that flying-foxes rapidly respond to the establishment or flowering of suitable food trees, irrespective of whether vegetation is remnant or restored, highlighting the capacity for rehabilitated landscapes to contribute meaningfully to foraging habitat availability.

The measures outlined in the OMP ensure the offset area will be delivered in a manner that will provide suitable habitat for koala and GHFF.

The Intergovernmental Panel on Climate Change's (IPCC) July 2010 Guidance Note on Consistent Treatment of Uncertainties was developed specifically to assist the various authors Fifth Assessment Report to maintain consistency in terminology and process across the document. The guidance was never intended for broader application. It is of note that, while the guidance note provides a structure for describing confidence, the level of confidence assigned comes down to the authors' 'judgement on the validity of findings' and 'the categories defined... can be considered to have fuzzy boundaries'.

Comment – Additionality

> **6.** Four of the six management plan actions should not be considered **additional** to current landowner actions and obligations, being *Feral Animal Control* (primarily targeting Wild Dogs), *Weeds of National Significance Control* (prevention and management), *Access and Trespass Management* and *Bushfire Management*.
>
> I believe any reasonable person would expect, or a responsible land manager would be implementing, bushfire, access, invasive weed and pest animal control measures. I have not investigated relevant legal obligations on this offset provider but would expect to find local and state obligations to this effect, and that the existing EPBC Act offset site commits to these actions at the property scale.

Submission ID 113



Response to Comment – Additionality

There is no legal requirement for land managers to undertake non-vertebrate pest management or weed management on their properties. In Queensland the *Biosecurity Act 2014* requires land holders to take all reasonable steps to ensure they do not spread a pest, disease or contaminant. There is no requirement to treat Weeds of National Significance (WONS) across an entire property and keep coverage below 10%, which is the outcome of the management action. While land managers at cattle properties such as the proposed offset area would undertake occasional wild dog management it would only be in response to dog attacks on stock. Systematic annual management as required by the OMP is not part of general management of a cattle property.

Similarly, while fencing and bushfire management currently occur at offset site the level of implementation proposed in the OMP far exceed normal operations at the cattle property. Management measures include installation of additional fencing to exclude cattle from areas they currently graze, allowing native regrowth to establish. Bushfire management for native woodland (the endpoint of the offset site) is also more intensive than management of a cattle property which is largely cleared with bushfire managed by allowing cattle to graze in areas where regrowth is occurring.

It should be noted that bushfire management and fencing do not directly contribute to proposed increases in habitat values at the offset site, however they are considered essential to establishing and maintaining good quality habitat for MNES. Weed management only contributes 1.5% to the proposed increase in habitat values at the offset site, which is considered appropriate.

Existing land management practices at the offset area are outlined in section **2.0 (p. 24) of the OMP**.

2.14. Theme 14 – Indigenous and cultural value

A total of four submissions cited concerns around lack of engagement with First Nations people. Two representative submission extracts are provided below.

> **6. Cultural Heritage**
>
> The cultural heritage plan is outdated, and there's been no meaningful consultation with First Nations people for 25 years. Any development must be preceded by updated assessments and genuine engagement with Traditional Owners.

Submission ID 040

Indigenous Perspectives and Cultural Perspectives:

It has come to my attention through conversations with vulnerable people from CALD backgrounds, predominantly those from Aboriginal backgrounds, that they are massively concerned about these two developments Scenic/Peninsula. I have been told by Jagera Elders who I have yarned with, many based in Inala and in-and-around the Woogaroo Forest that "[they believe that the forest holds cultural and ethno-botanical significance to their people/mobs"].
Medicines from plants and fungi are important to traditions, culture and identity. Erasing this culture, identity and ability to access traditional medicines would be considered massively detrimental to Aboriginal people.

In my yarns with Elders, they have also noted that the Woogaroo and Rosewood clans were come of the first Jagera people to make contact with Surveyor-General John Oxley. This forest is one of the only areas close to the Goodna/Ipswich area which remains mostly untouched prior to colonisation. This land and the environment has massive significance to them. They believe that not enough Elders or family groups had been engaged with in the importance of this land, and they are concerned that SCG have dismissed land ownership and rights of people who interact closely with the land.

Submission ID 015

Response to Theme 13

As part of the Greater Springfield development, consultation was undertaken with indigenous stakeholders and cultural heritage experts. On 25 June 1999, a Cultural Heritage Conservation Plan (CHCP) for the Springfield Structure Plan was approved by the former State Government Environmental Protection Agency. The Concept Cultural Heritage Plan is provided in the **PD as Attachment A10**.

The CHCP identifies known or potential areas of Aboriginal cultural heritage sensitivity across the Springfield development area and establishes overarching management expectations for development with the purpose of assisting proponents in informing preliminary risk assessments and avoiding obviously sensitive areas during planning and design. The CHCP is recognised as a supporting planning and management document, but it does not replace or override obligations under the Aboriginal Cultural Heritage Act 2003 (ACHA).

The EPA categorised the artefact sites as:

- Not requiring further attention;
- Adequately protected; or
- Requiring additional protection.

Under the approved Cultural Heritage Plan site E is located adjacent to the Peninsula Precinct which is deemed to be in the "adequately protected" category, remaining within the public open space designation.

As noted above, a 'duty of care' in relation to Aboriginal culture heritage is established by the ACHA. The proponent will be responsible for enacting their 'duty of care' obligation under the Aboriginal Cultural Heritage Duty of Care Guidelines (Queensland) such as through incorporating cultural heritage awareness into site inductions and establishing clear "stop work" procedures in the event that artefacts or potential cultural heritage material are encountered.

It is noted the 'duty of care' obligation is also present in Section 10.2.3 of the SSP which states "A person must not remove, destroy or interfere with any identified cultural heritage resource of either aboriginal or European origin or item of the Queensland Estate" confirming the requirement that cultural heritage is to be identified and appropriately managed.

The above details have been added to **PD Section 7.3** to acknowledge the 'duty of care' obligation.



3. References

Austecology. (2013). MNES Vertebrate Fauna Assessments Land at Spring Mountain (EPBC 2013/7057). Prepared for Lend Lease.

Brown V.R. and Bevins S.N. (2017). A review of virulent Newcastle disease viruses in the United States and the role of wild birds in viral persistence and spread. Vet Res. 48(1):68.

Cardno. (2014). Ecological Assessment – Existing Environment (EPBC 2014/7306). Prepared for Cherish Enterprises Pty Ltd. August 2014.

Commonwealth of Australia (2013). *Survey guidelines for Australia's threatened mammals: Guidelines for detecting mammals listed as threatened under the Environment Protection and Biodiversity Conservation Act 1999*. Department of Sustainability, Environment, Water, Population and Communities, Canberra.

DAWE (2022). *National Recovery Plan for the Painted Honeyeater (Grantiella picta)*. Department of Agriculture, Water and the Environment, Canberra.

DCCEEW (2023). Draft Referral Guidelines for the Nationally Listed Brigalow Belt Reptiles (Version 1.1). Department of Climate Change, Energy, the Environment and Water, Canberra.

DCCEEW (2024). National Recovery Plan for the Swift Parrot (*Lathamus discolor*). Department of Climate Change, Energy, the Environment and Water, Canberra.

DCCEEW (2026). Delma torquata in Species Profile and Threats Database, Department of the Environment, Canberra. Available from: https://www.environment.gov.au/sprat. Accessed Thu, 18 Jun 2026

DoE (2016). National Recovery Plan for the Regent Honeyeater (*Anthochaera phrygia*). Department of the Environment, Commonwealth of Australia.

Department of Sustainability, Environment, Water, Population and Communities (DSEWPaC). (2011). *Survey guidelines for Australia's threatened reptiles: Guidelines for detecting reptiles listed as threatened under the Environment Protection and Biodiversity Conservation Act 1999*. EPBC Act Survey Guidelines, Australian Government, Canberra.

Eby, P. and Law, B (2008). Ranking the feeding habitats of Grey-headed flying foxes for conservation management. a report for The Department of Environment and Climate Change (NSW) & The Department of Environment, Water, Heritage and the Arts October 2008.

Lin, H., & Li, X. (2025). The Role of Urban Green Spaces in Mitigating the Urban Heat Island Effect: A Systematic Review from the Perspective of Types and Mechanisms. *Sustainability*, *17*(13), 6132.

McConkey, K. R., and Drake, D. R. (2015). Low frequency of seed dispersal by bats in riparian forests. Biotropica, 47(4), 388–396.



Vinson, S., Johnson, A. and Mikac, K. (2020). Thermal cameras as a survey method for Australian arboreal mammals: a focus on the greater glider. Australian Mammalogy. 42. 367-374.

Wagner, B., Garnick, S. W., Ryan, M. F., Isaac, J. L., Begg, A. and Nitschke, C. R. (2025). Thermal Drone Surveys to Detect Arboreal Fauna: Improving Population Estimates and Threatened Species Monitoring. Ecological Applications35(6).

Yabsley, S. H., Meade, J., Martin, J. M., and Welbergen, J. A. (2021). Human-modified landscapes provide key foraging areas for a threatened flying mammal: The grey-headed flying-fox. PLOS ONE 16(11).



Appendix A

Submission 008

[redacted]

[redacted]

14 December 2025

Springfield City Group
Peninsula Precinct Development
PO Box 4167
SPRINGFIELD QLD 4300

To whom it may concern

REF: EPBC case number 2020/8629 - Peninsula Precinct

As a Queenslander, who has lived near the Springfield area for most of the last 25 years, I am writing to express my deep concern about the two proposed housing developments (Scenic Precinct and Peninsula Precent) which will cause significant destruction to Woogaroo Forest. While this submission specifically refers to the *Peninsula Precinct development* both developments will cause significant catastrophic damage to the Woogaroo Forest and the vulnerable native species that depend on that habitat.

There are several matters identified in the Saunders Havill Group (SHG) Peninsula Precinct, Springfield report (EPBC 2020/8629) which support the conclusion that the federal Department of Climate Change, Energy, the Environment and Water (DCCEEW) **should not approve this development as a controlled action and SCG should cease its plans for these developments.**

Core to this submission is that under the EPBC Act, the five (5) species: regent honey eater and the swift parrot are "critically endangered"; koalas are "endangered" in Queensland, NSW and ACT; the greater glider is also "endangered"; and the grey-headed flying fox is "vulnerable".[1]

For ease of reference, I refer to the Preliminary Documentation Report PDF, dated October 2025 as Part Ai[2] and the Attachments PDF as Part Aii[3] respectively.

Information from the Saunders Havill Group report relating to the Peninsula Precent (EPBC 2020/8629) states:

[1] https://www.environment.gov.au/cgi-bin/sprat/public/publicthreatenedlist.pl?wanted=fauna#mammals_critically_endangered
[2] https://irp.cdn-website.com/4d994537/files/uploaded/7399+E+Peninsula+Precinct+PD+EPBC+2020-8629+31.10.2025.i-2c00b0ed.pdf
[3] https://irp.cdn-website.com/4d994537/files/uploaded/7399+E+Peninsula+Precinct+PD+EPBC+2020-8629+31.10.2025.ii-d79faa79.pdf

- *The Peninsula Precinct project area occupies a total land area of 18.90 ha and* ***the entirety of this area is considered to contain 'critical habitat' for koalas, grey-headed flying-foxes, swift parrots and regent honeyeaters. The refined proposal area will result in the clearing of 18.90 ha containing critical habitat for the four (4) MNES[4] species: koalas, grey-headed flying-foxes, regent honeyeaters and swift parrots.*** *(Part Ai, page vi)*

- ***The project will result in the removal and functional loss of 'critical habitat' for koala that has the potential to have a 'significant impact' on the species based on utilisation of the site by koalas and knowledge of their broader population dynamics.*** *(Part Ai, page iv)*

- *Given the widespread distribution of the grey-headed flying fox across South East Queensland, the availability of habitat throughout the Springfield locality and temporal dynamic of the overlap with Koala habitat,* ***potential impacts [...] are presumed to be considered to significantly impact on the grey-headed flying-fox.*** *(Part Ai, page iv)*

- *Under the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act), the* ***swift parrot*** *is listed as 'critically endangered.' An assessment of foraging habitat values within the referral area identified the presence of preferred foraging species listed under the National Recovery Plan for the swift parrot including Corymbia citriodora and Eucalyptus tereticornis.* ***The proposal will result in the removal of preferred foraging species and as such, a significant residual impact is anticipated.*** *(Part Ai, page v)*

- *Under the EPBC Act, the* ***regent honeyeater*** *is listed as 'critically endangered.' An assessment of foraging habitat values within the referral area identified the presence of preferred foraging species listed under the National Recovery Plan for the regent honeyeater including Corymbia citriodora and supporting species Eucalyptus fibrosa.* ***The proposal will result in the removal of preferred foraging species and as such, a significant residual impact is anticipated.*** *(Part Ai, page v)*

In contrast to the four critically endangered and endangered species mentioned above, the authors of the Peninsula Precinct report (SHG) conclude that it is highly unlikely that the Peninsula Precinct development will impact on the endangered greater glider population. The authors state:

- ***At the time of the controlled action decision[5]*** *the Greater Glider was listed as a vulnerable species under the EPBC Act. [...] The Peninsula Precinct project area predominantly contains remnant native vegetation that includes a variety of eucalypt species. However, the site has been subject to disturbance in the form of fire, vehicle use and logging, leaving relatively few large and hollow-bearing*

[4] Matters of national environmental significance (MNES) protected under the Environment protection and Biodiversity Conservation Act 1999 (EPBC Act).

[5] This phrasing means that the authors know that the greater glider's survival status has worsened since the controlled action decision commenced and is now – five years later – now endangered.

trees within the impact site. Greater Glider were not identified within the referral area during targeted spotlighting and aerial wildlife surveys in September 2023 nor have they ever been recorded as part of pre- and post-clearance fauna surveys and reporting from the surrounding Springfield development.[6] ***It is considered highly unlikely the species occurs or would recolonise the area due to substantial surrounding fragmenting factors***[7] *and it is concluded that a* ***significant impact on the Greater Glider is unlikely****. (Part Ai, page v)*

However, the SHG conclusion[8] that:

- there are relatively few large and hollow-bearing trees; and
- highly unlikely the species occurs **or would recolonise the area**

may be questioned based on evidence in the report. Referring to its desktop assessment, SHG assessed a **moderate** likelihood that greater gliders were present in the referral area but its field survey assessed this was a **low**. *(Part Aii, page 34)* In the conclusion (paraphrased above), the authors seem to disregard the evidence which supports its own "**moderate**" likelihood of occurrence assessment regarding the presence of greater gliders in the referral area, including that:

a) the referral area meets the definition of remnant vegetation for species RE12.9-10.29 and RE12.3.11[10], i.e. the canopy height and coverage of the mapped remnant vegetation is consistent with the remnant status definition. [11]

DESTI defines "remnant woody vegetation" as vegetation that has not been cleared or vegetation that has been cleared but where the dominant canopy has greater than 70% of the height and greater than 50% of the cover relative to the undisturbed height and cover of that stratum and is dominated by species characteristic of the vegetation's undisturbed canopy. [12]

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[6] The authors fail to mention the role that the proponent, Springfield City Group, played in destroying and disturbing the habitat immediately surrounding the referral area and Woogaroo Forest arising from its Springfield City developments. This adjacent Springfield developments have isolated the Woogaroo Forest area from nearby important conservation areas including White Rock and the military base at Greenbank; and caused the destruction of previously confirmed greater glider habitat within the Springfield area itself.

[7] Note the authors refer to *surrounding* fragmenting factors, not *internal* fragmentation within the large area of Woogaroo Forest itself, which contains habitat that could sustain greater gliders currently and in future, assuming further development in the Woogaroo Forest is avoided.

[8] SHG used a combination of desktop and field assessments and "the likelihood of occurrence" was finalised based on field survey results and the confirmed vegetation communities and associated habitats contained within the referral area. Field surveys included spotlighting and drones (Part Aii, page 32; and Part Ai, page 57)

[9] Regional ecosystem details for 12.9-10.2 | Environment, land and water | Queensland Government

[10] Regional ecosystem details for 12.3.11 | Environment, land and water | Queensland Government

[11] Part Aii, Section 3, Description of the project area

[12] About regional ecosystems | Environment, land and water | Queensland Government

b) the referral area is 18.9 ha but is part of the larger Woogaroo Forest which is 420 ha; which is ample size to sustain greater glider population which typically have a small home range of < 3 ha.[13]

c) Logging in Woogaroo Forest ceased around 1992[14] when the land was purchased from Associated Forest Holdings[15] for urban development by Maha Sinnathamby, the chairman of SCG. Since then regrowth trees have matured in the 30 years since logging ceased. Moreover, when logging occurred, trees were removed selectively and many old growth trees were deliberately retained and are still present, including immediately adjacent to the referral area. Indeed, the aerial photo taken of the referral and surrounding area of Woogaroo Forest in the Springfield area in 1990, still shows dense tree foliage,[16] demonstrating that the referral area was never fully cleared but was only logged selectively (unlike the offset land). Also, previously logged trees in Woogaroo Forest have rejuvenated over the last 30 years and will continue to improve the habitat quality with time (and **assuming further development is prohibited**).[17]

d) While the referral area identified for the Peninsula Precinct has mostly young to intermediate aged vegetation, it is immediately adjacent to **mostly mature and intermediate to mature vegetation** within other parts of Woogaroo Forest.[18]

e) According to SGH, since 1980, the referral area has remained in a relatively natural state except for minor clearing for vehicle access.[19] This would indicate that regrowth trees in the referral area are around 45 years old making them even more suitable for greater glider habitat. Also, in this context, the trees would be more intermediate in age than young, given SGH's claims the land has remained in a relatively natural state since 1980.[20]

f) Although fragmentation exists between Woogaroo Forest and adjacent residential development and transport infrastructure, which would impede greater gliders' ability to travel independently from nearby White Rock Conservation area and Greenbank (confirmed to be greater glider habitat); fragmentation is not currently a problem within the 420 ha of Woogaroo Forest

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[13] https://www.agriculture.gov.au/sites/default/files/documents/guide-greater-glider-habitat-qld.pdf page ii

[14] https://www.domain.com.au/news/greater-springfield-the-history-and-future-of-this-new-queensland-city-1036610/

[15] https://www.pictureipswich.com.au/nodes/view/2120#:~:text=In%20early%201992%20Maha%20Sinnathaby,before%20inclusion%20on%20Picture%20Ipswich.

[16] Part Aii, PDF page 66, Historical Aerial Imagery in 1990 before logging ceased.

[17] https://www.ipswichtribune.com.au/campaigners-demand-leaders-save-forest#:~:text=%E2%80%9CThe%20mature%20canopy%20comes%20from,be%20considered%20as%20old%20growth.

[18] Part Ai, A22 Forest Maturity Map (Griffith University)

[19] Part Ai, PDF page 42

[20] Part Ai, PDF page 41

itself in which the referral area is located.[21] [22] Therefore, the 420 ha Woogaroo Forest could support recolonisation by greater gliders if they were introduced as part of a conservation program (**assuming no development within Woogaroo Forest occurred**).

g) Despite not finding any greater gliders during the short field surveys,[23] the authors acknowledged that Woogaroo Forest, including the Peninsula Precinct referral area, is part of an ecosystem with a known or possible association with Queensland greater gliders.[24] The SHG authors report that the Greater Glider presence in the referral area and within the Springfield lakes area has not been seen in the past 20 years (specifically Queensland government Wildnet records multiple sightings in 1993 in Springfield), and not since the significant disturbance associated with the creation of Springfield lakes developments occurred, prior to which the surrounding landscape was predominantly vegetated and well-connected.[25] [26] [27]

Unfortunately, the "Greater Glider Connectivity Analysis"[28] shows significant barriers and hazards between the Peninsula Precinct referral site and Woogaroo Forest on the one hand; and the closest confirmed greater glider habitats in White Rock and Greenbank making it unlikely (probably impossible) that greater gliders (or koalas) could travel safely and independently from either the White Rock or the Greenbank military area to colonise the remnant Woogaroo Forest in Springfield. The authors note that **the corridor linkages are intersected and severed at multiple locations by major infrastructure, including rail and major roads**.[29]

Yet the Queensland government legislated Springfield Structure Plan (SSP), approved in 1997,[30] requires "habitat connection" specifically between Springfield development area and the White Rock Conservation and Greenbank "to preserve the diversity of habitats for flora and fauna".[31] **The images in the Greater Glider Connectivity Analysis clearly show that the proponent, SCG; Ipswich City Council; and other responsible local or state government authorities failed to ensure adequate "habitat connection" areas were maintained – as they were required to do under the legislated SSP**. The "surrounding fragmentation" of Woogaroo Forest – which the proponent significantly contributed to – is given as the key reason the SHG authors

[21] Part Ai, page 56
[22] Part Aii, Attachment A5, Greater Glider connectivity analysis; and Part Ai, page 153, section 4.9 Greater Glider
[23] Part Ai, A25 Greater Glider Targeted Spotlighting Field Survey
[24] Part Ai, A21 Greater Glider suitable regional ecosystems
[25] Part Ai, page 73 and 157
[26] Part Aii, Table 4, Likelihood of occurrence of fauna species within the referral area: moderate, page 20 and Appendix C
[27] https://greaterspringfield.com.au/our-city/history-of-our-city/
[28] Part Aii, Attachment A5: Greater glider connectivity analysis, PDF page 185
[29] Part Aii, page 73
[30] Part Ai, page 167
[31] https://hdp-au-prod-app-ipsw-shapeyouripswich-files.s3.ap-southeast-2.amazonaws.com/9417/5607/4591/Springfield_Structure_Plan.pdf Section 8 Conservation Designation

conclude that greater gliders are unlikely to independently recolonise the remaining 420 ha remnant forest within Springfield area, i.e. the Woogaroo Forest.

h) the vegetation that is typical of the regional ecosystems: RE12.9-10.2 and RE12.3.11[32] includes species used by the greater glider for foraging and denning.

The Queensland Department of Environment, Tourism, Science and Innovation's (DETSI) "*Guide to greater glider habitat in Queensland*" (2022)[33] states the diameter of a tree at breast height (DBH) is a reliable measure to assess suitability of greater glider habitat; and from indicative studies, the benchmark of > 50 cm DBH is suitable for greater glider habitat.[34] Trees > 50 cm DBH are more likely to contain suitable hollows for sheltering by greater gliders. Furthermore, trees > 30 cm DBH are preferentially selected for foraging and > 50 cm DBH for denning.[35]

i) In the Greater Glider Habitat Assessment,[36] SHG identified 132 potential habitat trees in the Peninsula Precinct referral area, among 629 recorded in the broader survey area. The majority of habitat and hollow-bearing trees within the survey area had a DBH between 40 cm and 60 cm (54.45%). The remaining hollow-bearing trees had a DBH between 60 cm and 110 cm. In other words, 83% of the 101 trees identified with hollows in Woogaroo Forest had a DBH > 50 cm, which DESTI regards is suitable to sustain greater gliders. A total of 56 hollows were found within the Peninsula Precinct referral area.[37]

According to the DESTI greater glider guide, the following flora species dominant[38] in greater glider habitat for foraging in South East Queensland:

- Corymbia citriodora (Lemon scented spotted gum)[39]*
- Eucalyptus crebra (Narrow-leaved Ironbark*[40]
- Eucalyptus portuensis aka acmenoides[41] (white mahogany)*
- Eucalyptus moluccana (Gum-topped Box)*
- Eucalyptus tereticornis (Forest Red Gum)[42]
- Corymbia intermedia (pink bloodwood)*[43]

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[32] Part Aii, page 25 and 26, Ecological Context of referral area; and Vegetation Communities map (page 73)
[33] https://www.agriculture.gov.au/sites/default/files/documents/guide-greater-glider-habitat-qld.pdf
[34] ibid. page 29
[35] Denning refers to providing a hollow or shelter for the greater glider.
[36] Part Ai, page 78
[37] Part Ai, Table A13, page 79; and A23 Greater Glider Diurnal Habitat Assessment plotting trees of DBH > 46 cm and trees with hollows in the referral and within the surrounding Woogaroo Forest; A24 Tree Plot Assessment – Hollow Categories
[38] DESTI report cites at least 59 species of eucalypt, melaleuca, corymbia and other species recorded to be used by greater gliders (page 19)
[39] Part Ai, page 27
[40] ibid.
[41] https://apps.des.qld.gov.au/regional-ecosystems/details/?re=7.11.16#:~:text=Eucalyptus%20portuensis%20(white%20mahogany)%20and,(BVG1M:%209d).
[42] *Part Ai, page v.* As noted by the SHG, this species is also critical habitat for the swift parrot.
[43] Part Aii, Ecological Assessment – Matters of National Environmental National Significance, page 21 and 26; and PDF page 25 section 3.5 describe the status of the native vegetation relevant to the project

j) According to the SHG report, the narrow-leaved ironbark dominated the habitat tree plot with 222 trees recorded (35.29%). Of significance is the trees marked above with asterisk denote that this species were present in the referral area in the field survey. [44]

Therefore, the data collected by SHG demonstrates that the referral area and surrounding Woogaroo Forest (the survey area) contains remnant native habitat of sufficient area (420 ha), with suitable tree species, size (measured by DBH), and maturity with hollows for denning and foraging that could again support greater gliders in this area. Indeed, greater gliders were previously in that area up until 1993 when several sightings were last recorded (including after logging ceased and well before those trees had time to regrow as they have now in the last 33 years). So despite the earlier logging, the habitat in 1993 sustained greater gliders; and could do so again (with the assistance from a government enforced conservation program and assuming all development in Woogaroo Forest is prohibited permanently).

It should be noted that since the controlled action decision was taken in 2020, the greater glider's status has worsened and is now 'endangered' under the EPBC Act. It is for this reason that any habitat that has the potential to sustain greater glider populations, particularly an area with remnant forest as large as Woogaroo Forest (420 ha) with suitable dominant foraging and denning flora species should be protected and used to support conservation of greater gliders and other endangered species as DESTI recommends:

> *any Queensland regional ecosystem that has been identified as greater glider habitat,* ***no matter how fragmented, will have value for greater gliders either now if hollow-bearing trees present*** **– which Woogaroo Forest and the referral area currently have – or in future with restoration**.[45] DESTI recommends that remnant patches of potential greater glider habitat should be valued as habitat regardless of patch size.[46]

DESTI also states that:

> *As a consequence of historic broadscale clearing of greater glider habitat,* ***particularly in southeast Queensland (> 40% cleared), all habitat and potential habitat should be protected particularly in the fragmented regions***. *Patches containing small trees that will later be recruited to the large tree class should also be considered as future habitat.* [47]

This is another reason this development should be rejected as a controlled action.

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[44] Part Ai, page 78
[45] https://www.agriculture.gov.au/sites/default/files/documents/guide-greater-glider-habitat-qld.pdf page 25
[46] ibid. page 33
[47] ibid. page 33

Other vulnerable species in the referral area

While the focus of the SHG reports has been on MNES as a controlled action under the EPBC Act, SGH identified other species listed as vulnerable under the Queensland Nature Conservation Act 1992. These include:

- the tusked frog[48] [49]
- powerful owl [50]

Both species were recently confirmed to have a presence in the referral area and/or within Woogaroo Forest. The tusked frog was identified in a 2023 ecological survey conducted by SHG in the referral area.[51] The Powerful Owl Project undertaken by Birdlife Australia regularly receives records of observations of powerful owls in and around Woogaroo Forest by trained project volunteers and the public. There are at least two powerful owl nests in the area. Hence, Woogaroo Forest provides important breeding season habitat for powerful owls and their prey. [52]

The Woogaroo Forest is known to be essential habitat for the powerful owl under Queensland State mapping.[53] Despite knowing of their vulnerable status, the tusked frog and powerful owl[54] have not been given even cursory consideration of the environmental impact on these species and their essential habitat. Therefore, these vulnerable species should be added to those five MNES species which will be significantly directly impacted by the SCG developments in Woogaroo Forest.

Mitigations and Offset Proposal

The SHG report states that:

> *The management measures remain preliminary to provide DCCEEW with some certainty that potential impacts can be mitigated and managed. (Part Ai, page vi)*

However, the preliminary plans – such as they are – cannot provide DCCEEW any certainty that potential impacts can be mitigated or managed to the extent required to avoid the significant harm that will arise from the development to the affected species. Indeed, later SHG state that:

[48] https://www.qld.gov.au/__data/assets/pdf_file/0014/67100/tusked-frog.pdf
[49] https://www.brisbane.qld.gov.au/content/dam/brisbanecitycouncil/corpwebsite/environment-and-water/documents/tusked-frog-conservation-action-statement.pdf.coredownload.pdf
[50] https://www.qld.gov.au/environment/plants-animals/conservation/threatened-species/featured-projects/powerful-owl
[51] Part Ai, page 81 Spotlight Night 3 Fauna Species 20.9.2023
[52] Birdlife Australia data available on request.
[53] Part Ai, PDF page 44 and PDF page 20
[54] Part Aii, PDF page 136

k) *The project [...] results in **very little relevant or meaningful opportunity for further avoiding impacts** on MNES[55] habitat [...] An environmental offset is proposed for impacts incurred and located at a large-scale with an aggregate of other offset approvals and proposals. (Part Ai, page 169)*

In other words, the SHG acknowledges that "management measures" will not mitigate the loss of 18.90 ha of critical habitat for the endangered and vulnerable species; nor the impact of this destruction on the adjoining habitat in Woogaroo Forest (as part of future SCG developments), which includes mature forest. The amount that will be left will be so small and fragmented that it will be difficult for any remaining endangered or vulnerable species to survive.

The proposed ROA3 Rosevale environmental offset property proposed[56] is entirely unsuitable as it **is predominantly cleared land**, and currently used for cattle grazing, and cropping.[57]

- The ROA 3 area on-site associated with the Peninsula Precinct (EPBC 2020/8629) will account for 41.3 ha of the Rosevale Offset Property. **The ROA 3 site consists of entirely open paddocks and dead plantation trees, designated entirely as non-remnant**.[58]

- SHG states that "**currently habitat values within ROA 3 are significantly limited** with only scattered regrowth trees adjoining regrowth vegetation.[59]

- Currently most of the 41.3 ha ROA 3 contains very limited canopy coverage and therefore **safe fauna movement is largely absent** as koalas are required to traverse large expanses of ground to move between foraging trees.[60]

- The offset property currently contains many feral species including cats, wild dogs, pigs, foxes, goats, deer and rabbit[61] which would pose a direct threat to the native species.

- The entire Rosevale Offset Property has 32 invasive species of weed, including lantana. velvety tree pear and fireweed, which will need to be eradicated to support the restoration of the native habitat, including from adjoining offset areas.[62]

- If approved the cattle farming and cropping will cease.[63] But a poultry farm is located on the Rosevale Offset Property adjacent to the ROA 3 allotment, which will

[55] Matters of national environmental significance (MNES) protected under the Environment protection and Biodiversity Conservation Act 1999 (EPBC Act).
[56] Part Ai, Rosevale Offset Management Plan, pdf page 210
[57] Part Ai, pdf page 227; Part Aii, Attachment A8 Rosevale Offset management Plan, dated 31 October 2025, page 209 and 242
[58] Part Aii, page 227, Offset area summary
[59] Part Ai, pdf page 227
[60] Part Ai, pdf page 243
[61] ibid., pdf page 245
[62] ibid. pdf page 317
[63] ibid. pdf page 242

continue and is likely to cause ongoing environmental impacts, including vehicle access; and attraction of wild dogs. [64]

- SGH claims, with 85% confidence,[65] it will achieve the restoration of vegetation within 20 years to the definition of remnant vegetation, i.e. 70% of canopy height and 50% of expected cover.[66] It is noted however, that according to the restoration plan it is not proposed to plant vegetation until the end of year 2, which will lose 2 years of growth needed for koala habitat.[67]

- In assessing the Offset Site Suitability, undue emphasis is given to the presence of Queensland Koala Habitat Areas south and west of the ROA 4 (for Scenic Precinct) and ROA 3 (for Peninsula Precinct) offset areas, which may form part of a future offset area for a separate EPBC project.[68] However, there is no certainty that such offset will be approved; and it still does not remediate the problem of fragmentation between the ROA4 and ROA3 sites and these other areas designated as Core Remnant Koala Habitat Areas.[69]

It is noted that planting obligations will be delivered across both the ROA 3 off set area (for Peninsula Precinct) and the adjoining ROA 4 (for the Scenic Precinct).

The offset land **does not contain remnant vegetation, let alone remnant vegetation that is similar or superior to that within Woogaroo Forest or the referral area**. Moreover it will require between at least 30 - 100 years to reach a similar level of maturity compared to the forest maturity in Woogaroo Forest and the referral area.

The EPBC Offsets Policy requires that offsets must be specific to the species or ecological community being impacted and **must improve of maintain the viability of the species**.[70] Given the poor condition of the proposed Offset areas ROA4 and ROA3 for the Peninsula and Scenic Precincts, the offset area cannot "maintain" or "improve" the viability of the affected MNES five species in this report until at least another 30 years. Moreover, the offset management plan only proposes management of this area for the next 20 years. Overall the proponent's proposal, contrary to its claims, provides no confidence that the two Offset sites will be of any value to MNES **compared to the status quo, i.e. to protect the entire Woogaroo Forest from further development.**

Similarly, the *Queensland Environmental Offsets Act 2014* [71]requires that the offset land provide environmental values as similar as possible to those being lost due to development. The core principle is that the offset must achieve a conservation outcome that is equivalent to, or better than, the environmental outcome that would have occurred had the impact not taken place.

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[64] Part Ai, pdf page 336-337, 341
[65] Part Ai, pdf page 256
[66] ibid. pdf page 252
[67] Part Ai, pdf page 378
[68] Part Aii, PDF page 263
[69] Part Aii, PDF page 245, Figure 8 shows proximity of ROA 4 offset to Core Remnant Koala Habitat
[70] Part Aii, page 14-15, section 6 Proposed offsets
[71]https://www.dcceew.gov.au/sites/default/files/documents/offsets-policy_2.pdf

Despite recognising the offset areas' current poor condition, and absent ecological value, under both state and federal law, the proponent claims the offset property is suitable to justify the destruction of most of Woogaroo Forest including the Peninsula Precinct. The offset proposed does not provide similar conservation values now compared to the current ecological value of Woogaroo Forest. Given the offset site is cleared, this is highly unlikely to be possible within the 20 years that the offset property is proposed to be managed by the proponent. **This is another reason this development should be rejected as a controlled action.**

Although the proponent (Springfield City Group) directly contributed to the destruction of greater glider habitat through its Springfield City suburban developments[72] which commenced in 1992;[73] [74] and even though the greater glider is now endangered, SGH does not consider the suitability of, or make provision for, the habitat for greater gliders in this offset proposal. Rather the offset proposal only seeks to provide future habitat for koalas, grey-headed flying fox, regent honey eaters and the swift parrot.[75]

Similarly, nor does the proponent assess the suitability of the offset property for tusked frogs or powerful owls which are classed as 'vulnerable' under Queensland law and which will be directly impacted by the development by the destruction of their "essential" habitat by the various developments proposed in Woogaroo Forest by the proponent.

The only way to effectively protect the essential habitat for these species is to avoid building new housing in areas with high ecological value with a diverse range of native wildlife, including five endangered or critically endangered and two vulnerable species. If the Department is to help reverse the endangered status of affected species (which occurs primarily through the destruction of their habitat), it needs to consider not just the impact on these species, but other wildlife that could also easily become vulnerable and endangered through the continuing destruction of habitat for development.

No reasonable person can argue that the poor condition of these two offset properties can in any way "maintain", and certainly will not "improve" the survival status of these seven species. As these offset properties will take at least 30 years to achieve remnant forest status then the offset property should be regarded as entirely unsuitable. If these endangered species have to wait at least another 30 years before the offset property will support these endangered species, it will be much too late. Instead, before those 30 years pass, we are likely to see further deterioration of these already endangered and critically endangered species to an even more perilous state.

This proposed action is a controlled action and should be rejected!

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[72] https://greaterspringfield.com.au/living-and-visiting/residential-property/

[73] https://web.archive.org/web/20040618000742/http://www.greaterspringfield.com.au/corporateBrochure.pdf

[74] https://greaterspringfield.com.au/our-city/history-of-our-city/

[75] Part Aii, page 220, Purpose of the (Offset) Management Plan

Besides the Peninsula and Scenic development projects, other development projects such as Bellview Woods and Springfield Village 2 and 3 are proposed for the remaining part of Woogaroo Forest, meaning SCG plans to destroy most of the entire Woogaroo Forest; which will have a catastrophic impact for all its unique flora and fauna. Mitigation actions like wildlife corridors to safe have areas which are referenced in a single development plan will be useless as later developments for Woogaroo Forest are also proposed.

Each development's impact is significant individually but will be further compounded if one or both the Peninsula and Scenic Precinct developments proceed. Moreover, the destruction of wildlife that will be caused by these developments – if either or both are approved – will make it much easier for the other 3 developments[76] proposed for Woogaroo Forest to proceed as much of the destructive impact on the endangered species and habitat will have already occurred and SHG will likely argue (as it did in the Peninsula and the Scenic Precinct reports) that the harm impacts for the endangered species will be "low" or "unlikely" (as the vulnerable and endangered species' are no longer present), i.e. the harm to these species would have already occurred.

This is the argument that the authors SHG made about why it considers the impact of the Peninsula Precinct to the greater glider to be low and unlikely to recolonise (i.e. without human conservation intervention). While the Springfield area in which the referral area and Woogaroo Forest is situated, previously contained greater gliders – with several sightings recorded in the Springfield area in 1993[77], due to the extensive development caused by the creation of Springfield Lakes suburb, by the proponent, Springfield City Group, greater gliders have not been detected in Springfield area since then.[78] Ironically, the SHG acting for the proponent, now argues that more development in what is still remnant forest cannot further hurt the greater glider, despite it having the features within the forest suitable to provide habitat for endangered greater glider and other MNES.

I am aware there is a need to build more residential housing, but such development does not need to be in areas which have significant ecological value and which will impact our fragile and endangered native flora and fauna, further dwindling the essential habitat available to them. There are many other areas in south east Queensland where new housing can be built with significantly less environmental impact, such on disused farming land[79] or less densely treed scrub area.

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[76] Bellview Woods, Springfield Village 2 and 3

[77] Queensland government, Wildnet, https://wildnet.science-data.qld.gov.au/

[78] Although greater gliders are still present within nearby White Rock Conservation and the military Greenbank areas. The land acquired by the company now known as the Springfield City Group was purchased in 1992 by Maha Sinnathamby and Bob Sharpless, and the first house land sales were recorded in March 1993. https://www.pictureipswich.com.au/nodes/view/2120

[79] Canungra has many large properties that are no longer used for dairy and cattle farming that remain that are yet to be developed.

The ecological significance of Woogaroo Forest should be preserved for the benefit of flora and fauna and local community to quietly enjoy this spectacular natural environment.

Once the environmental damage to Woogaroo Forest is done, it cannot be undone; and an offset property that requires at least 30 years to rejuvenate will not alleviate the threat to these species now. If Woogaroo Forest was destined for development as early as 2002 as SCG reported, then the SCG could have secured suitable offset property prior to the destruction of Woogaroo Forest, instead of waiting 23 years until 2025 to obtain *unsuitable* land for offset which it is now using to try to justify destroying the Woogaroo Forest habitat. The offset plan proposed, is wholly unsuitable, and will do nothing to maintain or enhance the wildlife that will unavoidably be killed due to habitat loss arising from this development, including the identified MNES species.

I urge SCG to please reconsider its plans to develop Woogaroo Forest.

Yours sincerely

[redacted]