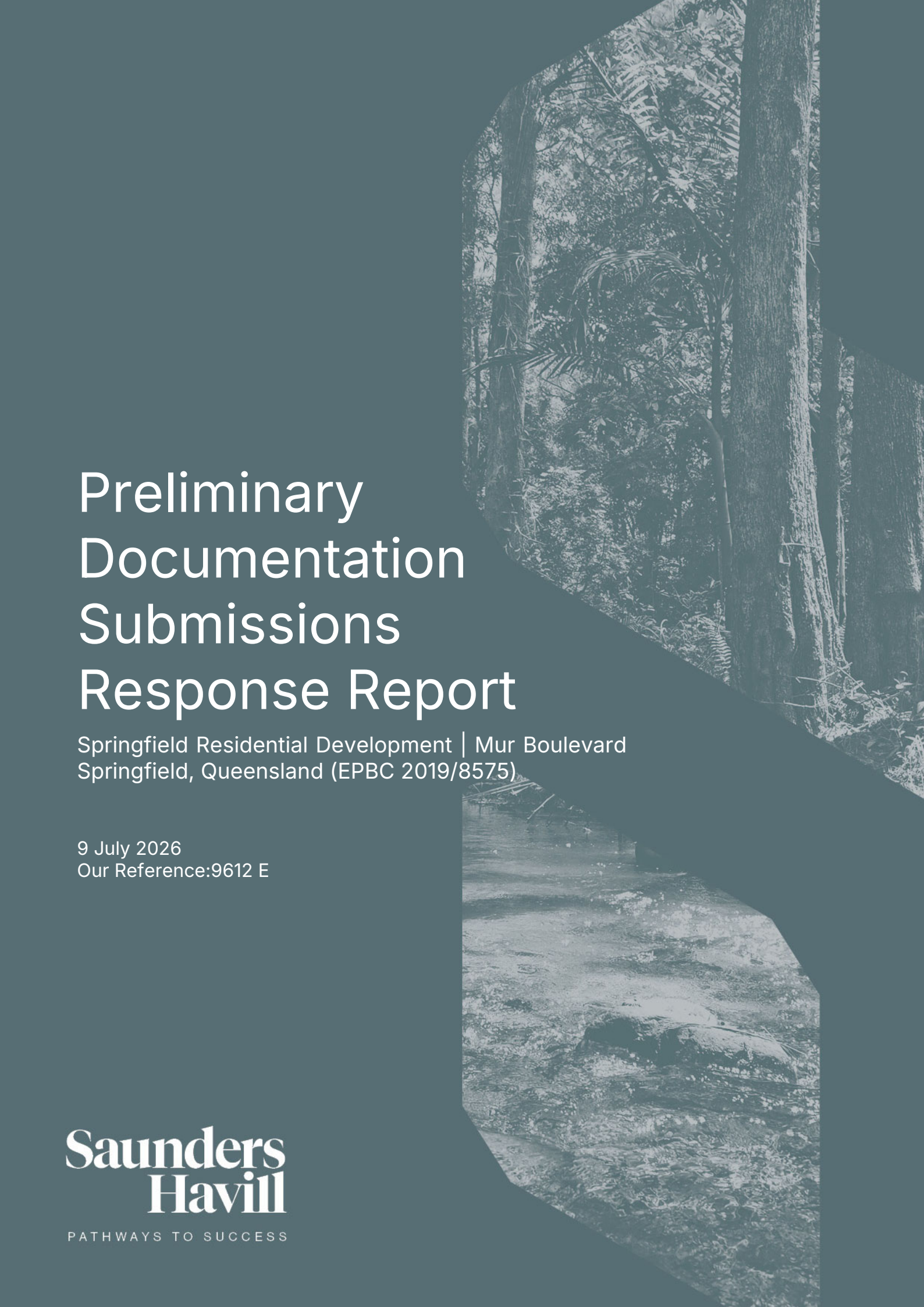




Preliminary Documentation Submissions Response Report

Springfield Residential Development | Mur Boulevard
Springfield, Queensland (EPBC 2019/8575)

9 July 2026
Our Reference:9612 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), Cherish Enterprises commenced the public notification process for the Springfield Residential Development, Springfield, Queensland (EPBC 2020/8651).

Public comments were invited on the Springfield Residential Development EPBC Act Preliminary Documentation Report for a period of 20 business days from the 13 February 2026 to the 12 March 2026.

A total of 1786 digital submissions were received during this period. At a high level, 93% submissions received were reflective of a templated style submission consisting of a mix of identical or derivative templates. Of this 43% were reflective of one template. The remaining 7%, comprising 120 of the submissions were determined to be unique or non-templated.

Due to the high level of similarity between the content within each submission including templated and non-templated submissions these were categorised into distinct themes and topics to assist in providing responses to the issues raised.

Each submission was assigned a digital ID which was used to identify submissions within this report and as part of the review process. Due to the high level of similarity between a number of submissions, submissions have been jointly addressed where possible through the grouping into themes. It is noted a single submission may overlap multiple themes where multiple topics or issues are raised.

A number of issues raised across submissions were identified to be representative of broader concerns around the EPBC Act and approval process rather than specific to the content within the Preliminary Documentation. This included topics such as the effectiveness of offsets, cumulative impacts at a regional scale and alignment with recent planning and research documents. These issues represent a large portion of the submissions received. While responses have been provided to address these issues raised, there is noted to be generally limited relevance to the material within the Preliminary Documentation or to the project generally.

A summary of themes and the number of submissions received for each is provided in Table 1 and displayed in Figures 1 and 2.

A number of submissions were also received outside of the formal period to provide comments. These have also been reviewed confirming no issues further to those received in the main submission timeframe were raised.

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	Number templated submissions	of Number of non-templated submissions	of Total number of submissions received
Broad themes				
1	Impacts to critical habitat	880 (16 templates)	80	960
2	Regional Planning and Conservation Principles	725 (1 template)	4	729
3	Offsets (broad concept)	824 (16 templates)	34	858
4	Environmental impacts	184 (1 template)	12	196
5	Community values	165 (2 templates)	12	177
6	Cumulative impacts	261 (6 templates)	19	280
Specific themes				
1	Habitat quality assessment	198 (5 templates)	3	201
2	Other protected matters	0 (no templates)	22	22
3	Woogaroo Vine Scrub and Lowland Rainforest of Subtropical Australia TEC	134 (6 templates)	10	144
4	Site design and avoidance-mitigation hierarchy	112 (1 template)	5	117
5	Impacts to the koala and population processes	395 (8 templates)	16	411
6	Impacts to the greater glider	217 (6 templates)	2	219
7	Offsets (specific)	21 (1 template)	6	27
8	General adequacy of survey effort	157 (4 templates)	3	160
9	Grey-headed flying-fox impact assessment	61 (3 templates)	2	63
10	Indigenous and cultural value	0 (no templates)	5	5
11	Local Approval Process	0 (no templates)	2	2



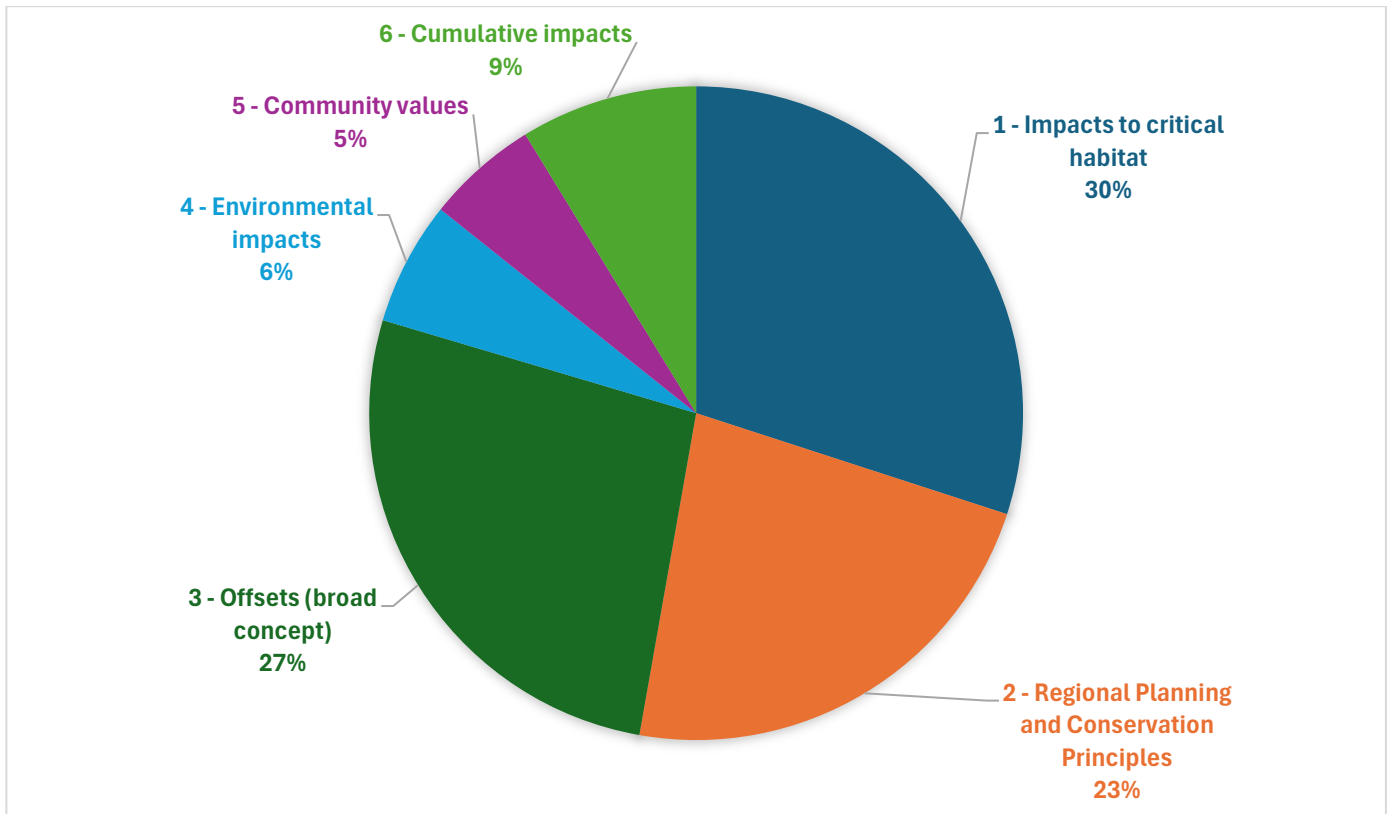


Figure 1. Percentage of submissions received – Broad themes

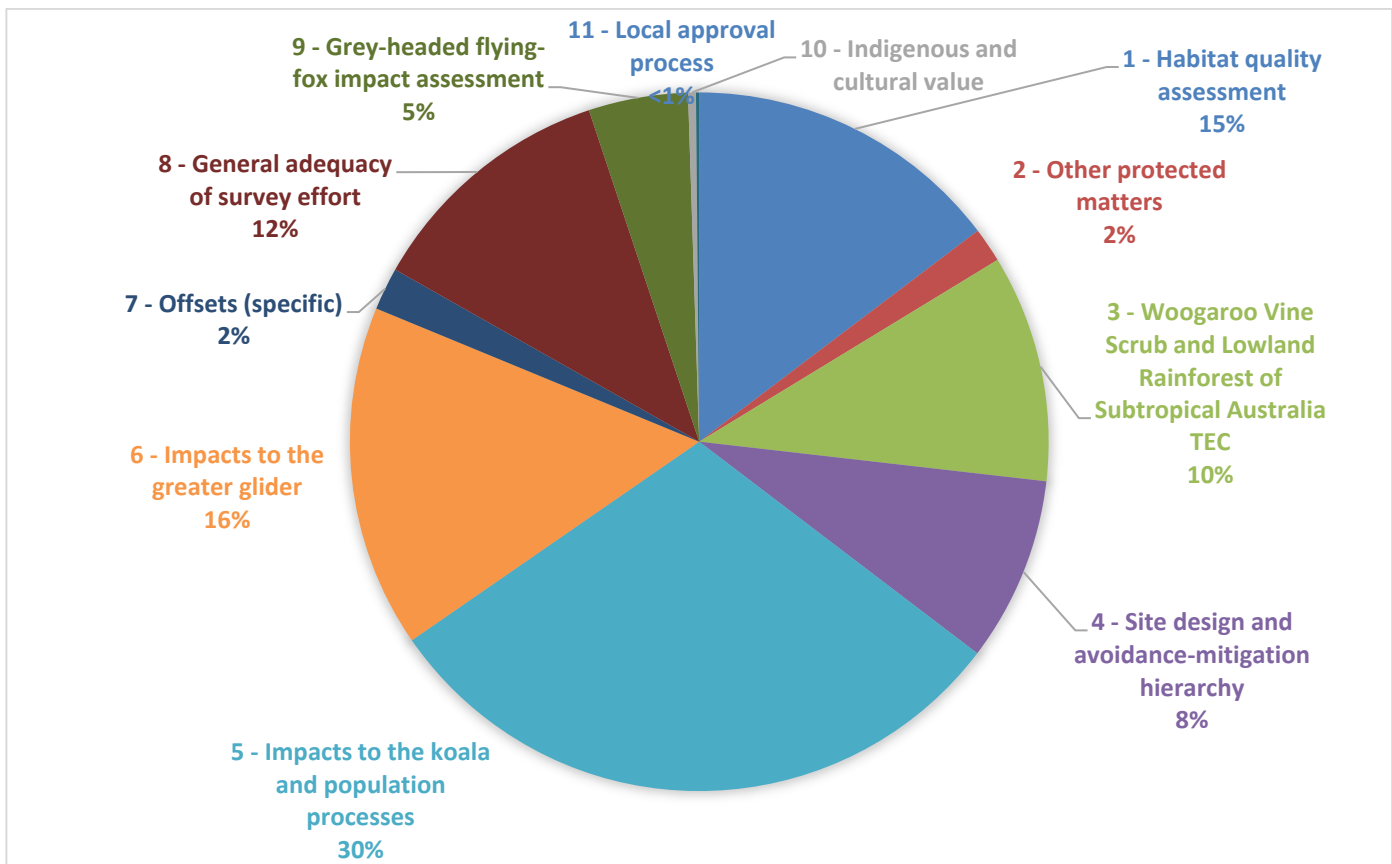


Figure 2. Percentage of submissions received – Specific themes



1.1. Additional changes

It is noted here for clarity that a minor change was made to the Avonvale Offset Area Management Plan (Attachment A15 of the PD Part A) outside of commentary received on the project. This included a minor change to the boundaries of two Assessment Units (AUs). AU 1 was reduced from an area of 49.3 ha to 46.6 ha and AU 2 was increased from 15.2 ha to 17.9 ha. The total offset area remains 168 ha. The change was made to allow for the retention of existing land uses adjoining the offset area within the broader offset property. The changes are reflected in PD Part A Sections 6.2 and 6.4 and various sections of the Avonvale OAMP (PD Part A Attachment A15).



2. Response to Submissions – Broad Topics

2.1. Theme 1 – Impacts to critical habitat

A total of 880 templated submissions and 80 non-templated submissions opposed the development on the basis of the proposed action resulting in significant impacts to critical habitat. Submissions were frequently noted to include commentary that the site contains critical habitat for the koala, grey-headed flying-fox, swift parrot and regent honeyeater and will result in significant impacts therefore should be rejected on this basis.

Representative examples of templated and non-templated submission extracts are provided below.

Dear Minister,

I am writing to express my profound alarm and unequivocal opposition to EPBC Case 2019/8575. What is proposed for Springview Village 2 & 3 is not a routine development—it is the deliberate destruction of one of the last intact remnants of Woogaroo Forest, a living ecosystem that cools, shelters, and sustains life in a region being rapidly stripped of its natural resilience. This forest is not “vacant land.” It is a functioning, irreplaceable habitat already supporting wildlife that cannot simply be moved, replaced, or compensated for.

The proponent’s own ecological report concedes that **136 hectares of vegetation will be cleared**, with **another 26 hectares indirectly damaged**. This includes habitat assessed as **score 7**, which the EPBC Koala Referral Guidelines classify as **habitat critical to survival**. These are not degraded edges or isolated patches. They are mature eucalypt forests, deep gullies, perennial watercourses, and continuous canopy corridors that have supported wildlife long before Springfield existed—and that remain essential to the survival of the Endangered koala.

Anyone who steps into Woogaroo Forest understands its significance immediately. The temperature drops. The air cools. The canopy closes overhead like a protective hand. These are the microclimatic refuges koalas depend on when the surrounding landscape becomes too hot, too loud, too fragmented. Yet this proposal treats their habitat as if it were expendable—something that can be bulldozed, offset, and forgotten.

It cannot.

The forest targeted for clearing forms part of a **500-hectare functional habitat block**, one of the last of its kind in the region. It contains mature native eucalypts, hydrological features, and microclimatic refugia that the proponent themselves acknowledge. These are the exact conditions koalas rely on to survive heatwaves, drought, and the accelerating pressures of urbanisation. Once destroyed, these conditions are gone permanently. **No offset can recreate them. No planting can replace them. No mitigation measure can undo their loss.**

Offsets cannot rebuild a century-old tree. They cannot recreate the coolness of a gully or the safety of an unbroken canopy. They cannot reverse fragmentation—the very threat the proponent admits will increase risks of dog attack, vehicle strike, and chronic disturbance. Fragmentation is not a hypothetical concern; it is the primary driver of koala decline across South East Queensland. Every severed corridor is another barrier, another danger, another step toward local extinction.

This development would carve apart a forest that still functions as a refuge—not only for wildlife, but for people. Woogaroo Forest is one of the last places where residents can hear birds instead of traffic, where children can see wildlife in the wild, and where the community can still feel connected to something older, quieter, and more enduring than concrete.

The proponent’s own documentation acknowledges the presence of habitat critical to survival, the likelihood of increased koala mortality, and the irreversible nature of the clearing proposed. Yet it concludes that impacts are “manageable.” There is nothing manageable about permanently destroying the home of an endangered species. There is nothing manageable about pushing an already struggling population closer to collapse.

Under the EPBC Act, the Minister must be satisfied that significant impacts will be avoided. In this case, they cannot be. The impacts are **significant, permanent, irreversible, and entirely preventable**.

Woogaroo Forest has already endured decades of encroachment and fragmentation. What remains is precious beyond measure. To lose it now—at the very moment koalas are fighting for their survival—would be a devastating and unnecessary blow, not only to wildlife but to the community that cherishes this forest.

I urge you to refuse EPBC 2019/8575. Once this forest is gone, it is gone forever. And with it goes another irreplaceable piece of Australia’s natural heritage—one we cannot afford to lose.

Template 3 Extract



1. Critical importance of the site for the endangered koala (*Phascolarctos cinereus*)

The proposed action will result in serious, irreversible, and scientifically well-established harm to the South East Queensland (SEQ) koala population. Koalas living within the Woogaroo Forest landscape comprise part of the SEQ koala cohort, which has undergone severe decline due to habitat loss, fragmentation, heat stress, and urbanisation.² The remaining habitat in Woogaroo Forest is not a 'nice to have' but is essential to the ongoing viability of the species in this region.

The ecological characteristics of the site, combined with the scale of proposed clearing and the species' known biological vulnerabilities, demonstrate that the action is highly likely to have a significant impact under the *EPBC Act Significant Impact Guidelines 1.1* and the *EPBC Referral Guidelines for the Vulnerable Koala*.

The project area contains ecological features fundamental to koala survival. These include:

- Mature eucalypt forests providing high quality, stable food resources;
- Deep, shaded gullies functioning as microclimatic refuges during extreme heat events;
- Continuous canopy corridors enabling safe movement between shelter trees; and
- Hydrologically intact riparian zones supporting moisture rich microclimates.

Collectively, these features constitute one of the last functioning habitat refuges for koalas in SEQ, and land clearing the Woogaroo Forest habitat for development will directly undermine the survival prospects of this endangered species.

Submission ID 0059

According to the Ecological Report, habitat score calculations undertaken in accordance with the EPBC Act referral guidelines for the vulnerable Koala (2014) assessed large areas of the site as having a **habitat score of 7**, meaning the habitat is considered **critical to the survival of the species**. On this basis, the proposed action is likely to have a significant impact on critical Koala habitat and fails the intent of the EPBC Act to prevent further decline of listed species.

Submission ID 0661

Dear Minister,

I am writing as a local resident, a parent, and someone who feels a deep connection to the natural spaces that make our community liveable and healthy. Woogaroo Forest is more than a patch of bushland — it is a living ecosystem, a wildlife refuge, and a place of quiet beauty that our children deserve to grow up alongside.

I strongly oppose the proposed development and urge the Commonwealth to reject this action. In a region already rapidly losing green space, this forest represents one of the last remaining intact bushland corridors. Once it is cleared, it is gone forever.

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

Submission ID 0905



3.3 Grey-headed Flying-fox (Vulnerable)

The Department notes proximity to a nationally significant camp and key foraging resources.

The proposed development area contains 161.4 ha of suitable foraging resources for the GHFF (MNES Management Plan – Ai, p29). Flowering eucalypts provide critical winter food shortages (Eby et al. 1999). Removal of large mature flowering trees disproportionately affects colony survival due to boom-bust nectar cycles.

Incremental loss of mature foraging habitat across landscapes is recognised as creating seasonal bottlenecks.

The proposal contributes to that cumulative risk.

3.4 Swift Parrot & Regent Honeyeater (Critically Endangered)

Both species rely on winter flowering box-ironbark systems.

Peer-reviewed population viability analysis for Regent Honeyeater demonstrates that extinction is plausible in the absence of large-scale habitat intervention (Heinsohn et al. 2022). Peer-reviewed research on Swift Parrot demonstrates that cumulative habitat/resource loss materially worsens viability trajectories (Crates et al. 2017).

Where extinction risk modelling already identifies precarious trajectories, additional habitat/resource loss cannot be assumed negligible.

Under the precautionary principle (s 3A EPBC Act), uncertainty strengthens - rather than weakens - the case for refusal.

Template 13 Extract

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 128 hectares (ha) of vegetation defined by DCCEW 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 in accordance with relevant survey guidelines included spotlighting, drone and thermal imaging surveys, Spot Assessment Technique (SAT) surveys, motion-triggered camera monitoring, BioCondition transects and several days of tree plotting of hollow-bearing trees whereby individual trees were located and assessed (refer PD Part A Section 2.4.3 for field survey details).

The proposal includes mitigation and avoidance measures to reduce immediate and long-term impacts on MNES. Impacts are proposed to an area of 128 ha with 27.5 ha proposed as vegetation retention area adjoining Woogaroo Creek and Opossum Creek (refer PD Part A Section 1.1.2), increasing from 18.7 ha. It is noted the proponent has previously dedicated 49.2 ha of their broader landholdings to Ipswich City Council (ICC) within the Opossum and Woogaroo Creek corridors resulting in a total 76.7 ha retention area attributed to the Springfield Residential Development (refer PD Part A Section 5.2). Of the broader landholdings this is reflective of a retention strategy of approximately 90 ha combining adjoining areas of O'Dwyer's Creek tributaries and environmental retention areas of Kalina Village 1 (EPBC 2014/7306). The proponent has worked collaboratively with ICC and the DCCEW over several years to achieve a balanced outcome.

As part of obtaining local Operational Works approvals, management plans will be developed and implemented subject to ICC approval to maintain and improve habitat within the vegetation retention area, including but not limited to, a Rehabilitation Management Plan (refer PD Part A Section 5.4). A preliminary



version of this plan has been provided in the form of a Preliminary Bushland Management Plan (refer PD Part A Section 5.5 and Attachment A9).

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 Part A Section 6, an environmental offset is proposed to be delivered across three land-based offset areas, totalling a combined offset area of 675.8 ha. This includes 355.2 ha of revegetation focused management which will create habitat in areas containing little or no value for the targeted MNES and expand on existing habitat areas. Notably, the Mount Walker West Offset Area is located within the Ipswich region which will provide more localised benefit to the koala population of Ipswich.

The proposed offset will compensate for impacts for the koala, grey-headed flying-fox, swift parrot and regent honeyeater. Management of each offset will be delivered in accordance with the site-specific Offset Area Management Plan included at PD Part A Attachments A14 – A16. The proposal to offset impacts as a result of the action 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.

2.2. Theme 2 – Regional Planning and Conservation Principles

A total of 725 of identical submissions were received. These submissions followed the same template structure and were received from the same email address. The submission includes commentary on the project's proposed impact to critical habitat to the koala, tying into Theme 1. In addition to this general commentary, the submission raised two key issues with reference regional planning objectives and international benchmarks for halting biodiversity loss.

1. Ipswich City Council contains <30% vegetation cover which is below what is required to maintain biodiversity function per international benchmarks for nature retention i.e., (30 by 30 initiative). This provides direct reference to the 2023 report commissioned by the Queensland Conservation Council titled "Holding the Line – Reversing Biodiversity Decline".
2. Research commissioned by the Queensland Conservation Council create a regional planning map to guide developable and "no go" development areas in line with the changes proposed under the EPBC Act. These are detailed in the 2024 report titled "Principles and Zoning Rules for Bioregional Planning".

An extract of Template 1 is provided on the following page.

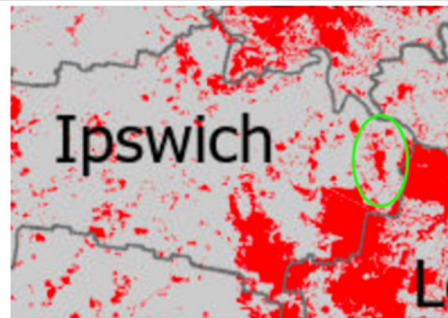
Additionally, four non-templated submissions relating to the subject were received. Notably, Submission 1628 specifically references the "Principles and Zoning Rules for Bioregional Planning" report (refer to extract below), stating the project is in conflict with identified high value habitat areas and "no go zones."



Regional Planning

Further reform of environmental legislation seeks to include regional planning. An environmental alliance in SEQ commissioned some modelling to test a zoning approach to impacts on MNES. Ward, et al (2024): “Principles and Rules for Implementing Spatial Zoning” defined one approach to regional planning. Mapping of MNES values in SEQ showed that Woogaroo Forest and this block, Lot 9999, was **high value habitat** – an area not to be cleared. So regional planning will certainly show that this area will be a “red light”/No Go area.

SGS Economics & Planning produced a background document on ‘Best Practice Regional Planning for SEQ’ in 2023. This was based on ESD and highlighted the need for better urban practices.



Submission Extract 1628



■ Preliminary Documentation Submissions Response Report

Dear Minister,

I am writing to object to the proposed Springview Village Stages 2 and 3 residential development because it would clear habitat critical to the survival of threatened species within the Woogaroo Creek forest landscape.

The proponent's own ecological assessment classifies the vegetation proposed for clearing as Habitat Score 7 under the EPBC Koala Referral Guidelines, meaning the habitat is considered "critical to the survival of the species." Clearing such habitat would remove a substantial area of forest relied upon by the Endangered Koala (*Phascolarctos cinereus*).

The proposal triggers assessment under sections 18 and 18A of the Environment Protection and Biodiversity Conservation Act 1999 due to impacts on listed threatened species and their habitat. The proponent's own documentation confirms that up to 136 hectares of remnant native vegetation would be cleared, with additional areas likely to experience indirect impacts such as fragmentation and disturbance.

Koala activity has been confirmed within the site through ecological surveys, and local residents regularly observe koalas in the surrounding forest. The RSPCA has also removed, treated and returned koalas to this site, confirming the presence of a resident population. The Woogaroo Creek forest is not simply habitat, it forms part of a connected habitat network supporting koalas across this landscape. Removing a large portion of this forest would therefore directly affect the viability of koala populations across the landscape by fragmenting the habitat network that enables movement between remnant forest areas.

The forest also supports arboreal mammals that depend on mature eucalypt ecosystems, including the threatened Grey-headed Flying-fox (*Pteropus poliocephalus*) and hollow-dependent species such as gliders and possums. A flying-fox camp is known locally to occur in nearby Camira, adjacent to the Woogaroo Creek landscape, highlighting the importance of remaining flowering eucalypt habitat in this part of the region. The Endangered Greater Glider (*Petauroides volans*) has also been reported within a few kilometres of the project area. However, the ecological surveys relied upon by the proponent appear insufficient to confidently exclude the presence of hollow-dependent species across the site. Survey effort for these species was limited and conducted several years ago, meaning the current assessment cannot reliably demonstrate that significant impacts would be avoided.

Remnant eucalypt forests in the broader Springfield region have also occasionally recorded highly threatened woodland birds such as the Swift Parrot and the Regent Honeyeater within the last decade. While these species are highly mobile and their presence is irregular, such local sightings highlight the ecological importance of remaining mature forest habitat in the landscape.

The significance of these impacts must be considered in this regional context. Independent ecological analysis prepared for the Queensland Conservation Council shows that the City of Ipswich retains only around 21% remnant vegetation, one of the lowest levels in South-East Queensland. Ecological research consistently indicates that landscapes require at least 30% vegetation cover to maintain biodiversity function. Ipswich has already fallen well below this threshold, meaning further clearing accelerates habitat fragmentation and species decline rather than simply adding to it.

- [Holding the Line report \(PDF 6mb\)](#), commissioned by the Queensland Conservation Council

Within this already depleted landscape, the Woogaroo Creek forest landscape represents one of the remaining substantial habitat areas. The forest forms part of a broader ecological corridor associated with the Woogaroo Creek and Opossum Creek riparian systems, which link remnant vegetation across the Springfield-Ipswich area. These creek corridors function as important wildlife movement pathways, allowing animals to move between remaining habitat patches. Clearing forest within this corridor risks severing this connectivity and isolating wildlife populations that depend on these remaining habitat linkages.

Recent conservation planning research undertaken by scientists from the University of Queensland, Griffith University and others was developed to inform proposed reforms to the EPBC Act and identify landscapes where nationally significant environmental values cannot be replaced if cleared. This work identifies "irreplaceable habitat" for threatened species and proposes that such areas be treated as "red zones" where development should be avoided because their loss would cause irreversible impacts on matters of national environmental significance. It specifically mapped "red zones" in South-East Queensland, and the Woogaroo Creek forest landscape falls within this high-value habitat area. Clearing this forest would therefore remove habitat that conservation science identifies as irreplaceable and is likely to result in a significant impact under the EPBC Act.

- [Principles and Zoning Rules for Bioregional Planning report \(PDF 4.4mb\)](#), commissioned by the Queensland Conservation Council

Offsets cannot compensate for the loss of mature forest ecosystems. Large hollow-bearing eucalypts required by arboreal mammals take many decades to develop, and offset plantings elsewhere cannot replace the connectivity, microclimate and ecological complexity provided by existing forest. In a landscape already below ecological viability thresholds, the remaining habitat cannot simply be replaced elsewhere.

Community values will also be significantly impacted by the loss of this forest. The Woogaroo Creek forest landscape is valued by local residents and the wider community for its wildlife, biodiversity and natural character in a region already undergoing rapid urban expansion.

The proponent's own documentation confirms that this proposal would destroy habitat defined as critical to the survival of the koala within a region already experiencing severe habitat loss. Given the cumulative impacts, the fragmentation of remaining habitat and the irreplaceable ecological value of this forest, approving this proposal would risk irreversible harm to matters of national environmental significance.

For these reasons, I urge you to refuse approval for EPBC 2019/8575.

Template 1

Response to Theme 2

The submissions grouped under Template 1 expressed concern that the project is in conflict with the national targets for conserving land for biodiversity, specifically the “30 by 30” target as indicated in template above. It is noted 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.

The template references the total percentage area of conservation land within the Ipswich local government area (LGA) as falling below these targets noting statistics that the Ipswich LGA has 21% of remnant vegetation and a minimum of 30% of vegetation cover is required to maintain biodiversity function.

However, it should be recognised that it is not necessarily accurate or practical to apply this 30% target as a benchmark to every local government area. The distribution of conservation land is not equal across LGAs as it depends on factors such as size of the LGA, population density and historic planning. Additionally, the SSP as a priority development area was conceptualised prior to this target being proposed and includes large areas of conservation and wildlife areas to balance development. The reference to remnant vegetation and vegetation cover in defining this for the Ipswich LGA is also inconsistent with the “30 by 30” target. Remnant vegetation is a status of vegetation used by the State government to describe the relative age of vegetation; however, this metric differs to vegetation cover which can also include non-remnant and regrowth vegetation classes.

The spatial mapping of “red zones” under the document titled “Principles and Zoning Rules for Bioregional Planning” referenced by Template 1 and Submission 1628, provides a high-level spatial map delineating high value biodiversity areas. The resulting red areas identified in the report is the product of high-level modelling which combines various publicly available data layers such as broad vegetation group datasets and remnant vegetation mapping. The resulting dataset is a coarse distribution of potential high value habitat polygons. These layers have not been refined for practical application and do not represent “no go zones” for the purpose of regional development. Additionally, this document is not a regulatory document, rather, is a high-level research document designed to inform changes to policy and planning documents being enacted under the EPBC Act reforms. It is noted the mapped red areas identified exclude the majority of the Springfield Residential Site (Figure S12), with only scattered polygons of red zone mapping.

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.



2.3. Theme 3 – Offsets (Broad)

A total of 824 submissions including several templated-style formats raised issue with the offset proposal. An additional 34 non-templated submission were also received on this topic. Comments received ranged from general statements around ecological equivalence in that the proposal cannot replace impacted habitat or site values (refer Template 4 extract) to more detailed summaries, referencing concepts such as time-lag, averted loss, MNES viability and risk of loss. A number of comments also claim, citing these factors, that EPBC Act Environmental Offsets Policy has not been satisfied.

3. Offsets will not replace Woogaroo Forest

The developer says they will “offset” the damage by improving other land. But offsets cannot replace old rainforest, its soil, its water, or its cool, shaded conditions. For a **Critically Endangered** rainforest, any extra damage is considered **serious and irreversible** under the EPBC Act.

Template 4 Extract

6. Offsets Cannot Replace Lost Koala Habitat

Offsets proposed by the proponent cannot replicate the ecological function of the habitat being destroyed.

Key limitations include:

- Mature koala feed trees require decades to reach functional value.
- Offsets cannot recreate microclimatic refuges essential during heatwaves.
- Time-lagged restoration creates prolonged periods of net habitat deficit.
- Offsets do not address fragmentation, the primary driver of koala decline.

Under the *EPBC Environmental Offsets Policy*, offsets must maintain or improve species viability. In this case, they **cannot**.

Template 7 Extract

Offsets Are Scientifically Insufficient and Legally Non-Compliant

The proponent’s offset strategy relies on:

- future ecological improvement rather than avoided loss
- unrealistic counterfactual assumptions
- decades-long restoration horizons

Offset science shows that time-lagged restoration results in **prolonged periods of net biodiversity loss**. Offsets cannot replicate:

- mature canopy
- hollow-bearing trees
- hydrological function
- landscape connectivity

The offset package therefore fails the EPBC Environmental Offsets Policy requirement to **maintain or improve** the viability of the koala.

Template 16 Extract



5. Offsets – Viability and Delivery Risk

The Avonvale Offset Area proposes 168 ha. However, the offset package does not presently demonstrate, on evidence, that it can maintain or improve the viability of the affected MNES given the immediate and permanent nature of the impacts and the inherent time-lag in projected gains.

5.1 Additionality and counterfactual assumptions

The offset documentation assumes a “risk of loss without offset” of 0%. (OAG, Part A.iii, p. 33). Where counterfactual loss risk is assessed at zero, the claimed conservation benefit cannot rely on averted loss and must instead depend on projected ecological improvement through management and revegetation. In such circumstances, careful scrutiny is required to ensure that the offset delivers genuine additional conservation outcomes consistent with the EPBC Environmental Offsets Policy.

5.2 Time-lag and modelling horizon

The Offset Area Management Plan defines an “Offset Period” of 20 years (OAMP, Part A.iii, Glossary, p. viii) and states adaptive management will apply for the life of the offset. (OAMP, Part A.iii, p.90) The Offsets Assessment Guide modelling horizon is capped at 20 years. The impact, however, is permanent and commences immediately upon clearing. While the documentation provides a general description of the current condition of the proposed offset land, it does not demonstrate equivalence with the impacted habitat, nor does it identify a clear or realistic timeframe within which the offset site would attain a comparable ecological state, particularly for mature forest attributes.

Peer-reviewed analyses of biodiversity offset programs identify time-lag between impact and ecological function recovery as a recurrent integrity challenge (Maron et al. 2012; zu Ermgassen et al. 2019). For habitat identified as critical to survival of koala and other woodland-dependent MNES, ecological functionality is linked to mature canopy structure, stable forage availability and landscape connectivity - attributes that develop over extended timeframes. Where the ecological gain is projected rather than realised at the time of impact, it is necessary to consider whether the modelling assumptions adequately account for delivery risk and temporal deficit. In plain terms, the damage happens now, but the promised benefits come later - if they come at all. That means nature is lost in the meantime, not balanced.

5.3 Regional implementation evidence in SEQ

Notwithstanding the proponent’s reliance on secured offset land for this proposal, publicly available regional evidence demonstrates a broader and persistent discrepancy between offset commitments and realised conservation outcomes in South East Queensland.

Independent analysis of offset implementation indicates that a substantial proportion of koala habitat impacts have been addressed through financial settlement mechanisms rather than the establishment of secured, ecologically functional offset sites, with only a small fraction of impacted habitat translated into on-ground offsets. As of 2023, 13.4 hectares of koala habitat impacts offset through financial payments since 2018, only 0.7 hectares (5.2%) had identified offset sites in place (University of Queensland, 2023).

This systemic reliance on financial settlements concentrates offset delivery pressure on a limited number of sites, increases the burden placed on those sites to compensate for multiple developments, and amplifies the consequences of time lags, implementation failure, and uncertainty. In this context, even where land is ultimately secured, offsets frequently fail to provide like-for-like ecological equivalence, particularly in terms of habitat maturity, landscape position, and functional connectivity. In light of these systemic shortcomings, it is not clear why additional and concentrated ecological risk should be imposed on a limited number of offset sites to compensate for unrealised or delayed offsets elsewhere, particularly where uncertainty and cumulative burden increase the likelihood of overall biodiversity loss.



5.4 Ministerial satisfaction under Part 9

Under Part 9 of the EPBC Act, the Minister must be satisfied that the action will not result in unacceptable impacts on MNES. Where permanent habitat loss is certain, and offset delivery is modelled and time-dependent, the question becomes whether the available evidence demonstrates that viability will in fact be maintained or improved at the relevant population scale.

In circumstances where regional implementation data show lag between impact and habitat establishment, and where ecological recovery is inherently time-dependent, a cautious and evidence-based approach consistent with s 3A (precautionary principle) is warranted. Modelled offset outputs should not be treated as conclusive in the absence of demonstrated, secured and timely ecological equivalence.

The proposed action involves the permanent clearing of habitat assessed as critical to the survival of koala and other MNES within an already fragmented and cumulatively pressured South East Queensland landscape (BAAM Connectivity Analysis, Attachment A3). The documentation acknowledges fragmentation, mortality threats and indirect impacts (AIR, Part A.ii). While offsets are proposed, the available evidence indicates that offset delivery in SEQ has not consistently kept pace with habitat loss, and that projected gains are inherently subject to time-lag and implementation risk.

In that context, approval would require a finding that immediate and permanent habitat removal - within a landscape already experiencing documented decline - will nonetheless maintain or improve MNES viability through projected, time-dependent offset outcomes. On the evidence presently available, that conclusion cannot be reached with confidence. Accordingly, approval would carry a material risk of contributing to ongoing net habitat decline and would be inconsistent with the precautionary and conservation objects of the EPBC Act.

Template 13 Extract

Offsets – Uncertain, Delayed, and Insufficient

The offset strategy relies heavily on long-term ecological improvement rather than averted loss. The proponent assumes a **0% counterfactual loss risk**, meaning all claimed benefits depend on decades-long restoration outcomes.

This creates several problems:

- **Immediate, permanent loss** is traded for **future, uncertain gains**.
- Time lags result in prolonged periods of net biodiversity decline.
- Regional evidence shows offset delivery often lags behind impact.

Offsets cannot replicate the **complex hilly topography, deep gullies, mature canopy, or ecological connectivity** of the site. Under the EPBC Environmental Offsets Policy, the proposal fails to demonstrate that MNES viability will be **maintained or improved**.

Template 15 Extract



7. Offsets – Uncertain, Delayed, and Insufficient

The offset strategy relies heavily on **future ecological improvement**, not averted loss. The proponent assumes a **0% counterfactual loss risk**, meaning all claimed benefits depend on decades-long restoration outcomes.

This creates several problems:

- Immediate, permanent loss is traded for **future, uncertain gains**
- Time lags result in prolonged periods of **net biodiversity decline**
- Offsets cannot replicate the **topography, mature canopy, or ecological connectivity** of the site
- Regional evidence shows offset delivery often **lags behind impacts**

Under the EPBC Environmental Offsets Policy, the proposal fails to demonstrate that MNES viability will be **maintained or improved**.

Template 9 Extract

Loss of mature nectar-producing trees contributes to **regional nectar bottlenecks**, a well-documented driver of flying-fox starvation events and colony decline. The site lies within the foraging range of a nationally significant camp, and incremental loss of foraging habitat across southeast Queensland is recognised as a cumulative threat.

Offsets cannot replace mature flowering trees within ecologically relevant timeframes. The proposal therefore fails to demonstrate that GHFF viability will be maintained or improved, as required under the EPBC Environmental Offsets Policy.

Submission 0681

I note that three properties are being offered as the offset:

Avonvale –	168Ha	12.11.14
Esk –	280Ha	12.9/10.2
Mt Walker West –	225Ha	12.8.16

These are bare paddocks of limited natural regeneration potential, as they have been grazed for generations. So, they will need planting.

This raises the first alarm bell. The Cherish block is such a large and unbroken canopy of excellent habitat that it needs to be offset by a **single block** that may one day become a mature canopy. Not three separate pieces. This is not an offset – “like for like”. This is not an offset – “nature positive”. This is not an offset – “effective”.

Submission 1684

Response to Theme 3

The content within the above submissions and broader database have been categorised into the different concepts below and responded to accordingly.

Relationship to EPBC Act reforms



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 to a number of these changes—as many of these are yet to be realised—the offset will be subject to stronger compliance monitoring facilitated through the Commonwealth Environmental Protection Agency which will come into effect on 1 July 2026. Additionally, a rigorous monitoring framework is proposed to be implemented under each OAMP (refer PD Part A Attachments A14 to A16) which includes associated Rehabilitation Management Plans. The implementation of these plans will allow for the offset program to be carefully monitored and provide a pathway for adaptive management.

Time-lag

Time-lag was identified as a primary concern (Template 13) in the delivery of the offset, and more specifically, between the time when the development site is impacted and when the offset area reaches a state where it is useable by MNES or becomes 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 Part A Attachments A14 to A16) and a monitoring framework which will allow for the identification of any issues requiring rectification that might slow or impede the offset recovery.

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 have historically been favoured by proponents and the department, where equivalence, timing, and long-term management obligations can be more clearly defined.

Averted Loss

Template 16 states that the focus on ecological improvement over averted loss results in an insufficient offset proposal. The offset areas have been assessed closely by DCCEEW and factors such as the current and potential future utilisation of the chosen offset areas by MNES were considered in their selection. It is noted that land-based offsets that propose to restore habitat and connectivity are preferred by the department over retaining and securing areas of existing habitat as this has been shown to over time reduce the available area for MNES. As such the proposed offset areas propose habitat creation as the primary management tool as per the DCCEEW's preference for habitat creation. Notably, each offset area is located 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.

It is also noted that a number of submissions provide commentary on the general effectiveness of offsets. For example, Template 13 states "While offsets are proposed, the available evidence indicates that offset delivery in SEQ has not consistently kept pace with habitat loss, and the projected gains are inherently subject to time-lag and implementation risk."



This comment citing ongoing habitat loss associated with offsetting is generally referring to academic critiques of averted loss offsets, which note that projected habitat quality gains have a tendency to be overestimated as a result of assumptions regarding future habitat loss, and as a result has led to a cumulative regional loss in habitat rather than a no net-loss outcome (e.g. Maron et al. 2015; Sonter et al. 2017; Gibbons et al. 2016).

The proponent has worked closely with the department to ensure habitat quality improvements for each proposed offset area is based on the implementation of high value management measures (e.g. tree planting) that includes a measurable and achievable framework that considers risk and adaptive management and minimises uncertainty.

Counterfactual Loss Risk

Template 13 (Point 5.1) and Template 15 raise the fact that a 0% counterfactual loss risk is used for the offsets noting that it creates problems where "Immediate, permanent loss is traded for future, uncertain gains." This is referring to the 'Risk of Loss' component of the Offsets Assessment Guide (OAG) calculator. Risk of Loss is the chance that habitat within a proposed offset site will be destroyed (e.g., cleared) in the foreseeable future, which can include impacts from land development and clearing for rural activities. The use of a 0% Risk of Loss influences how raw gains of the offset is calculated. A higher risk of loss translates into a higher offset value per hectare which means less offset area is required to compensate for impacts. The Risk of Loss is set at 0% per a requirement set by DCCEEW and means a greater area of offset is required to achieve a minimum of 100% acquittal of impacts.

Compliance with Environmental Offsets Policy and Ecological Equivalence

A number of submissions assert that the project does not meet the requirements of the EPBC Act Environmental Offsets Policy (EOP) (e.g. Template 9, 15 and Submission 0681). This is exemplified in Template 15 Extract with the statement "Offsets cannot replace the complex hilly topography, deep gullies, mature canopy, or ecological connectivity of the site. Under the EPBC Environmental Offsets Policy, the proposal fails to demonstrate that MNES viability will be maintained or improved." Submission 0681 provides the same statement in relation to grey-headed flying-fox. It is assumed this refers to the first offset principle to "deliver an overall conservation outcome that improves or maintains the viability of the aspect of the environment that is protected by national environment law and affected by the proposed action."

Additionally, submission 1684 states along a similar vein that the proposed offset areas are not "like for like" as they contain degraded areas rather than habitat of a similar quality to the impact area, suggesting a conflict with the ability of the offset to comply with the EOP.

For the koala, grey-headed flying-fox, swift parrot and regent honeyeater, improving or maintaining viability is primarily achieved through actions that increase the availability, quality, and connectivity of suitable habitat over time. Similarly, achieving "like for like" means the offset contains existing values or will provide values to support the species being impacted.

The proposed land-based offsets directly address these outcomes 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 these species. 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.

As a result, the proposal to offset impacts as a result of the action through the delivery of three land-based offsets 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.

Financial-based settlements

Template 13 (Point 5.3) is referencing offsets used under the Queensland Environmental Offset Policy. An offset for impacts to State vegetation or wildlife habitat is not proposed.

2.4. Theme 4 – Environmental Impacts

A total of 184 templated submissions, identified within Template 4, and 11 non-templated submissions cited environmental impacts as a concern, specifically including altered local climate regulation and hydrological and geomorphological changes. Refer to representative submission extracts below. A total of 12 non-templated submissions were received.

Nearby developed land within the Springfield region has been subject to large and ongoing land slippages of significance. In one such recent case, the side of a hill that had been battered to cut in a road, slipped out to such a large extent that the road was covered and took weeks to clear the slumped soil and repair the road. The geology of the land within the proposal is same as the land that landslides have occurred. The soil is sodic and therefore dispersive. Building houses on the side of a ridgeline in this type of soil is a risk to constituents lives and at very minimum the developing company should be made to undertake proper geotechnical investigation and geotechnical design to ensure all mitigations are in place to ensure no danger to life.

Submission 0061

Further concern arises from documents submitted for the Village 2 development application. The **Arcadis May 2020 Area Development Plan** shows extensive earthworks, including up to **15 metres of cut from ridgelines** and the dumping of this material into gullies, with fill depths of up to **15 metres in some locations**. This approach would fundamentally alter natural landforms, destabilise slopes, disrupt drainage patterns and increase sedimentation into downstream waterways. Creating residential blocks out of steep ridges and deep gullies is environmentally inappropriate and poses long-term risks to both ecosystems and future residents.

Submission 0661

- **Inter-Generational Equity and Nature-Based Solutions:** Retaining this habitat is a strategic "Nature-Based Solution" that mitigates physical risks such as the **Urban Heat Island effect**, which can lower local temperatures by up to 6°C. It also provides vital natural flood mitigation for an area that is high risk due to existing changes to land fall by surrounding developments undertaken by Stockland. The destruction of this natural asset severely compromises the environment for future generations.

Submission 0811



1. Clearing the forest will destroy it

The project will clear **136 hectares** of vegetation and harm another **26 hectares**. When forest edges are exposed, the inside becomes hotter, drier, and full of weeds. Scientists say these “edge effects” reach **50 to 100 metres** into the forest. This means the remaining rainforest in Woogaroo Forest will slowly die.

2. Changing the land and water will cause permanent harm

The developer plans to dump **up to 15 metres of fill** into Woogaroo’s gullies and ridges to make flat land for houses. This will:

- change how water flows
- make slopes unsafe
- remove the moisture the rainforest needs

These changes cannot be fixed. Once the water systems in Woogaroo Forest are damaged, the rainforest cannot recover.

Template 4 Extract

Stormwater detention basins in urban developments are engineered primarily for flow management and sediment capture. They are not ecological restoration systems and do not replicate pre-development hydrological regimes.

Where stormwater discharge and/or a basin is located upstream of a listed endangered ecosystem (applies to both eastern & western sides of proposed development), the following risks arise:

- Altered seasonal flow patterns
- Increased nutrient and pollutant pulses during high rainfall events
- Sediment mobilisation during construction and maintenance phases (20 year potential risk)
- Thermal loading from exposed basin surfaces
- Long-term maintenance failure or reduced performance over time

Given that the proposed development may occur over multiple decades, hydrological modelling must account not only for initial compliance standards but for cumulative, long-term operational and climate-driven variability.

Where uncertainty exists regarding whether altered hydrology may incrementally degrade an endangered ecosystem, reliance on engineered detention alone does not eliminate significant impact risk.

Approval should not proceed unless it can be clearly demonstrated through enforceable, performance-based hydrological standards, that downstream & upstream ecosystem conditions will be maintained. Either at or above current ecological health benchmarks over the life of the development, to continue supporting wildlife such as Platypus for example that are known to use the waterway that will be impacted by this proposed development. In the absence of such demonstration, the precautionary principle is engaged.

Submission 0938

Transport planning should support reduced environmental pressure

Environmentally responsible planning benefits from:

- Reliable and readily accessible public transport
- Sufficient commuter car and bicycle parking facilities with un-used spaces, available at all times public transport services are operating. To ensure access at all times for all potential commuters and limit car dependency to communities.
- Integrated public transport links between Springfield, Ipswich, Logan and Brisbane
- Transport infrastructure that prevents wildlife collisions, reduces emissions via reduced car dependency etc, and avoids further land clearing

Future development should only proceed where currently available public transport & facilities reduce pressure on local ecosystems, via cumulatively reducing car dependency of communities.



Submission 0938

Response to Theme 4

Topographical, hydrological and dispersive soil risks and management requirements have been rigorously assessed and reviewed as part of obtaining the Precinct Plan and Area Development Plan approvals for the project. The constraints, risks and requirements have reviewed by engineers and specialist consultants and been subject to detailed assessment by ICC as part of obtaining local approvals for the site.

Broadly this includes assessments of bushfire hazard and management, geomorphology, traffic impact, landslide hazard and stormwater and dispersive soils management. Assessments are publicly available at <https://developmenti.ipswich.qld.gov.au/> (refer PD Part A, Section 4.2.2). The Dispersive Soils Management Plan approved under the ADP approvals for Villages 2 and 3 is provided at Attachment A11 of PD Part A. The Stormwater Management Plan (SMP) is provided at Attachment A12 of PD Part A and discussed in Section 5.6.7.

It is noted the natural topography is in parts affected by slopes greater than 10%. The challenging topography requires outcomes in the reconfiguration design, road design, landscaping and stormwater treatment that are responsive to the natural features. This includes:

- Development of split level, outlook housing or alternative housing types on lots affected by steeper slopes (e.g. slope >10%).
- Protecting the existing natural gullies and locating stormwater treatment devices in appropriate locations.

The proponent has explored options to retain trees within local parks proposed as part of the Village 2 and 3 development design, however, due to the earthworking requirements the retention of individual or groups of trees is not possible to achieve. The protection of large areas of vegetation which retain connectivity to waterway corridors allows a more effective use of area with regards to maximising both developable area and retention areas.

In response to submission 0811 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. Acknowledgement of UHI effects is provided in PD Part A Section 4.2, Table A53 and Section 4.2.1.



Hydrological impacts specifically will be managed during clearing and operation in accordance with the SMP and conditions of the Area Development Approvals for Village 2 and Village 3 (ref: 4272/2020/ADP and 5547/2020/ADP). This includes developing and implementing stage-specific Erosion and Sediment Control Plans and designing stormwater detention technologies to minimise the effects of excess rainwater flowing into catchments caused by the creation of hardstand areas including stormwater quality and quantity (refer PD Part A Section 4.2.3, Table A54 (f)). The waterway stability strategy is provided at Section 5.0 of the latest version of the SMP which has been reviewed by Ipswich City Council and approved under the Village 3 ADP (ref: 5547/2020/ADP). Under the conditions for the ADP the following are required:

- Internal and external stormwater drainage infrastructure caters for a storm event with an Annual Exceedance Probability (AEP) of 1%.
- Provide a detailed inter-allotment drainage system designed in accordance with Queensland urban drainage manual.
- Submission of a Stormwater Quality Management Plan for approval which demonstrates stormwater runoff associated with the development achieves the water quality objectives outlined in Table 2.3.1 of Planning Scheme Policy 3 General Works of the Ipswich Planning Scheme prior to discharge from the site and is supported by MUSIC modelling where appropriate and details of the ongoing maintenance activities.
- Operational works drawings of final locations and cross sections of stormwater infrastructure in accordance with the approved SQMP and Section 2.3.5 of Planning scheme Policy 3 General Works of the Ipswich Planning Scheme.
- Maintenance period of all stormwater infrastructure for a minimum of 24 months.

The above details have been added to PD Part A Section 5.6.7.

In response to the concerns around increased local traffic and crowding expressed in some of the submissions (e.g. 0938), there are multiple provisions in place that will mitigate impacts associated with this. The development has been subject to traffic impact assessment as part of the ADP for Villages 2 and 3 which evaluates the development in terms of its internal layout and road hierarchy, public transport connectivity, peak hour traffic generation and impact on the surrounding road network. The report titled *Springview Estate, Springfield – Village 2 & Village 3, Traffic Impact Assessment, prepared by PTT* is available at <https://developmenti.ipswich.qld.gov.au/> (ref: 5547/2020/ADP). Impacts to peak hour traffic within and external to the development site has been modelled, with the assessment noting where planned upgrades to key intersections are necessary to be brought forward to mitigate projected increased traffic flows.

Additionally, the development site's proximity to urban 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 Part A Section 5.1).

A number of submissions including templated and non-templated cite concern with indirect impacts and edge effects on retained vegetation areas as a result of the action (e.g. Template 4). Edge effects include a range of impact types such as light pollution, sediment runoff, dust generation and weed incursion and are all acknowledged potential indirect impacts that may arise as a result of the action. However, a number of mitigation measures are proposed to reduce the potential for immediate and long-term edge effects during construction and operation of the development through, detailed in PD Part A Section 4.2.3 Table A54. Mitigation measures include industry standard practices which incorporates the need for annual



monitoring and compliance for detection and rectification where required. An assessment of the effectiveness of mitigation measures is provided in Section 5.7.1 for clearing and construction and in Section 5.7.2 for operation. These areas also detailed in a standalone document (MNES Management Plan at PD Part A Attachment A8) which is proposed to be implemented during the action. During operation of the development / timed with the relevant operational works stage, construction protocols will be generally removed, and rehabilitation improvement works in line with a Council approved management plan will commence targeting groundcover and woody weeds and provide infill planting where necessary to assist in regeneration. The combination of clearing and construction mitigation measures and operational measures are considered suitable to mitigate the potential for development-induced edge effects. An adaptive management framework will be applied to ensure measures can be modified and adapted where demonstrated not to be successful: a provision which is detailed within the MNES Management Plan.

2.5. Theme 5 – Community Values

A total of 165 templated submissions and 12 non-templated 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 social impacts of the loss or reduction of these values as a result of the development. A sample of representative submission extracts are provided below.

It is not clear that the developer has sufficient understanding of, nor experience in, design for 'Human Factors'. Their submission is lacking detail on Human Factors and is based on little to no consultation with the local community. If they had consulted sufficiently with the local community, they would know that this land is a well used and loved outdoor area for families, children, for exercise and koala spotting.

The local community can all see this forest on a hill from their front doors or whilst sitting on their back decks. It provides a connection to nature and a true sense of place.

The Human Factors have not been adequately addressed in the event this is removed from the community and replaced with a densely populated urban and sterile place.

Minister, there are many more nearby land parcels that do not have this usage and appreciation by the local community, that are far better suited for land development for housing.

Submission 0061

This vegetated block has been part of Springfield since it began and has always been considered as a permanent Reserve that was used for marketing and to justify and most of the clearing in Springfield. Many constituents that bought land and built houses here have letters stating this Reserve would never be cleared or developed.

Submission 0061



Dear Minister,

I am writing as a resident of Karana Downs to express my deep concern about the proposed development impacting Woogaroo Forest.

This forest is a vital habitat for native wildlife and a precious natural space for our community. Clearing this area will cause irreversible damage to ecosystems and threaten species that rely on it for survival. Once lost, this environment cannot be replaced.

As a parent and community member, I want my children to grow up with access to nature, wildlife, and green spaces. Protecting this forest is essential for future generations.

I respectfully urge you to reject this development and prioritise the protection of Woogaroo Forest.

Submission 1403

Anyone who steps into Woogaroo Forest understands its significance immediately. The temperature drops. The air cools. The canopy closes overhead like a protective hand. These are the microclimatic refuges koalas depend on when the surrounding landscape becomes too hot, too loud, too fragmented. Yet this proposal treats their habitat as if it were expendable—something that can be bulldozed, offset, and forgotten.

Template 3 Extract

5. Human and Social Impacts

The retention of this forest is immeasurable for the local populations who already call this region home. As well as the entire South East Qld population, and national and international visitors, both now and into the future. It serves as a natural buffer against climate-related weather events and provides essential "green infrastructure" for the mental and physical well-being of the Springfield community.

Submission 0811



Impact on Wildlife Rescue Efforts

To further exacerbate these risks, the clearing of Woogaroo Forest will place an unsustainable burden on local wildlife rescue groups, such as Bat Conservation & Rescue Qld and other volunteer-led organizations. These groups are already chronically under-resourced and are frequently pushed to a breaking point during recurring environmental crises, such as the mysterious "flying-fox paralysis" events that plague the region. Removing 134 hectares of primary foraging habitat will inevitably lead to a surge in orphaned pups, "grounded" starving adults, and entanglement injuries in backyard fruit netting as bats are forced into residential areas.

Specialist bat volunteers are the only people trained and vaccinated to rescue/remove flying-foxes and microbats from public and private areas. These volunteers are struggling to keep up with the demand already in SE QLD and in Ipswich Shire, due to the clearing of forests. There are no government or paid agencies that are able to rescue and care for bats.

Expecting volunteers - who already operate at maximum capacity - to manage the fallout of a predictable, developer-driven ecological collapse is both unrealistic and irresponsible. This increased workload not only risks the welfare of the animals but also heightens the risk of accidental exposure to ABLV for the well-meaning but untrained members of the public who often attempt to "help" grounded bats before rescuers can arrive.

Submission 1680

5. The forest's beekeeping heritage and ecological role have been ignored

Historically, the Woogaroo–Goodna–Redbank Plains Forest corridor supports extensive beekeeping, due to its diversity of flowering native species and stable forest microclimates. These forests sustain both European honeybees (*Apis mellifera*) and numerous species of native stingless and solitary bees, which were once abundant across the region, but are under threat of being destroyed during local land developments such as this one put forward from the proponent.

Key species in the Springfield - Ipswich region include but are not limited to, the stingless *Tetragonula carbonaria* (Sugarbag bee), *Tetragonula hockingsi*, *Austroplebia australis*, *Amegilla* spp. (blue-banded bees), resin bees and leaf cutter bees (*Megachile* spp.) and carpenter bees (*Xylocopa* spp.). All of which are essential for pollinating local gardens, trees and crops. These local bee species are also involved in other very significant environmental interactions within an ecosystem.

Today, Woogaroo Forest is the last critical remnant of that beekeeping landscape, providing the final refuge for native bee populations that previously thrived across the area. Additionally, with the increased pressures faced by European honeybees critical to our pollination needs, due to Varroa destructor mites, now is even more crucial to ensure the survival of our indigenous bee species. Without bees, insects and pollinators, this will cause massive ecological and environmental issues to the entire region.

Submission 1601

Response to Theme 5

The Springfield Residential Development 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 128 ha of vegetation within privately owned land which is within the Queensland Government's Regional Plan as 'Urban Footprint' and zoned under the SSP for residential development (refer PD Part A Section 5.1).



There are several submissions that state the action area should be protected as vegetation reserve (e.g. submissions 0061 and 1403). 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 Springfield Residential Development has been planned for development since the 1997 SSP approval and is surrounded by approval decisions for residential development, infrastructure and amenity which cannot be replicated in any other location in Queensland. Although large in scale, the land is an infill parcel for which a number of critical approvals and infrastructure are founded. Surrounding development within the areas of Bellbird Park.

The action site represents a key area left to be developed under the SSP. The formation of 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.

A number of 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. submission 0811). The preservation of green space has been a crucial consideration of the proposal and development design. While the project will remove 128 ha of vegetation, it is also committed to balancing development areas with open space and vegetation retention. The action will retain 27.5 ha of remnant vegetation, expanding linear areas adjoining Woogaroo Creek and Opossum Creek. The retention area proposed is above what was initially proposed under the SSP with additional interface areas of Woogaroo Creek now set aside for permanent protection. Ongoing recreational use within the natural areas of Woogaroo Creek, Opossum Creek and O'Dwyer's Gully will be enabled through the creation of dedicated areas for public use facilitated by the action.

The proponent has explored options to retain trees within local parks proposed as part of the Village 2 and 3 development design, however, due to the earthworking requirements the retention of individual or groups of trees is not possible to achieve. The protection of large areas of vegetation which retain connectivity to waterway corridors has proven a more effective use of area with regards to maximising both developable area and retention areas.

Public access to Opossum Creek and Woogaroo Creek is currently limited to the developed areas of Brookwater and Springfield where within council-owned land. The development will promote greater



access opportunities to the natural areas of Opossum Creek and Woogaroo Creek for community residents.

Additional detail has been added to Section 7.2 of the PD Part A to address the above comments.

Submitter 0061 stated “many constituents that bought land and built houses here have letters stating this Reserve would never be cleared or developed.” While the content of these welcome letters that the submitter is referring to cannot be confirmed, it is noted that statements around open space retention would likely have been made. However, it has always been envisioned under the SSP that more recent development areas such as those associated within Bellbird Park and Brookwater would be adjoined by permanent vegetation retention areas including Woogaroo Creek and Opossum Creek corridors. It is more than likely that representations around these significant natural features and their planned retention, rehabilitation and protection would have been emphasised. These planned corridors comprise substantial retention areas within what is considered an urban hub, focusing on habitat viability and ecosystem function compared with the comparatively smaller and more narrow corridors associated with minor waterways and parkland areas.

Some submissions received make reference to the anticipated added pressures that the development will add to wildlife rescue efforts such as the Bat Conservation & Rescue Queensland (Submission 1680). The scale and timing of impact from a general wildlife perspective has been addressed in other sections (see Section 3.5), however, is addressed here as well due to the community impacts. It is noted that clearing will be completed progressively under a staged clearing approach. The project is divided into two broad staging areas being Stage 1 – Village 2 and Stage 2 – Village 3. Stage 1 – Village 2 will be cleared progressively in sub-stages and will be completed in its entirety before clearing and construction impacts in Stage 2 commence. The progressive rollout of clearing impacts from a population viability perspective will mitigate impacts of habitat loss as it will reduce ecological shock, allow fauna to disperse safely and maintain habitat continuity. The retention of contiguous foraging habitat areas adjoining the completed development will allow persistence of incidental foraging activities for flying foxes, microbats and other fauna.

Submitter 1601 states that ecological function of bees, both native and introduced, has not been acknowledged as part of the PD. The action area comprises remnant forest and provides habitat for a range of species groups including insects and pollinators. Crucially, the development will balance remnant vegetation areas with the developable area to ensure ecosystem services including pollinator sources will persist within the landscape.

In light of commentary received on community values addressed in this section and also in Sections 2.6, 3.3 and 3.5, updates have been made to PD Part A Section 8 Ecologically Sustainable Development.

2.6. Theme 6 – Cumulative Impacts

A total of 261 templated submissions and 19 non-templated submission (total 280) raised broad concerns around cumulative impacts from the combined impacts of surrounding EPBC referral projects, highlighting the need for a broader action assessment. These comprised predominantly of templated-style submissions. Submission 0816 is also included as this references clearing activities which were completed along the Opossum Creek corridor by another entity to support sewer infrastructure, and the associated



impacts. This was considered to fit within the theme of cumulative impacts as it relates to activities which occurred near the project.

Representative submission extracts are provided below.

The Department's Additional Information Request explicitly requires proponents to assess **direct, indirect and cumulative impacts at local and regional scales** (DCCEEW 2020).

Given the number of related development proposals within the Springview area, a comprehensive cumulative impact assessment across the broader landscape would provide greater confidence in the assessment process.

Submission 0993

4. Cumulative Impacts on a Declining Population

The south-east Queensland koala population is already experiencing **severe cumulative pressures**, including:

- Ongoing loss of mature eucalypt canopy
- Increased frequency of lethal heatwaves
- Reduction of climate-resilient refuges
- Intensifying urban encroachment and associated mortality risks

The EPBC Act requires the Minister to consider cumulative impacts. The proposed clearing directly contributes to the **collapse trajectory** of a population already listed as Endangered.

Template 7 Extract

5. Cumulative Impacts – A Documented Collapse Trajectory

The site forms part of a **660-ha koala landscape** already under pressure from multiple adjacent EPBC projects. The proponent provides no population-level viability modelling. Conservation science is unequivocal: cumulative clearing—not isolated projects—drives collapse in fragmented landscapes.

The relevant question is not whether this project alone causes extinction, but whether it **materially increases the probability of local population failure**. The evidence shows that it does.

Template 21 Extract

The proponent's reliance on the 1997 Springfield Structure Plan to suggest that avoidance is no longer feasible cannot displace the Minister's present statutory obligations under the EPBC Act. The Act requires a contemporary assessment of likely significant impacts on Matters of National Environmental Significance at the time of decision, based on current ecological conditions and current scientific understanding.

Historic planning frameworks do not override Commonwealth biodiversity protections, nor can they predetermine the outcome of an EPBC assessment.

Since the 1990s, South East Queensland has experienced continued habitat loss, fragmentation and documented declines in koala and other MNES populations. Conservation science recognises that cumulative degradation can alter viability thresholds over time. In that context, reliance on a decades-old structure plan as justification for present-day clearing risks failing to account for materially changed environmental conditions.

The statutory question is not whether development was once contemplated, but whether, on current evidence and under contemporary legislative standards, approval would be consistent with the protective objects of the EPBC Act.

Template 13 Extract



During 2021 and 2022 a sewerage upgrade was undertaken along the Opossum Creek. The upgrade stretched over 2km and necessitated the clearing of a belt ranging from 20 to 40m wide. Thousands of mature trees were removed, including **Core Koala Habitat**. As of today, very little has been done to restore the area which has allowed weeds, grass plants and wattle to take over. Restoration to date has only involved the planting of Lomandra, no trees.

Submission 0816

Response to Theme 6

The theme of cumulative impacts within Greater Springfield and the project's role in contributing to these impacts was a recurring theme among submitters. Some submitters cited concerns with a contemporary view citing the presence of multiple proposed impact areas adjoining EPBC 2019/8575 and that their overall impact should warrant one impact assessment. Some submitters focused on the historical clearing which was occurred within Greater Springfield as facilitated under the Springfield Structure Plan and a need for further review on MNES and the assessment within the PD (e.g. Template 13 and 21).

It is noted an assessment of indirect, facilitated and cumulative impacts as a result of the development as requested by the PD Information Request is provided in PD Part A Section 4.2. Additional details have been added to Section 4.2.1 to address the historical and broader habitat impacts within the SSP.

In response to the first point, these submissions appear to reference the concept of cumulative impact assessment in the context of the EPBC Act reforms which are progressively being integrated into the Act. One component of the reforms is targeted at addressing regional cumulative impacts such as those created through the presence of multiple actions within the landscape, through the development of bioregional plans which will seek to delineate areas of development and 'no-go' zones.

The Springfield Residential Development and adjoining actions being the Scenic Precinct (EPBC 2020/8651) and Peninsula Precinct (EPBC 2020/8629) are being assessed under the EPBC Act and significant impacts on MNES will be compensated for in accordance with the EPBC Act Environmental Offsets Policy. The assessment of the proposed action is being undertaken in accordance with the requirements of the EPBC Act as it currently stands and in accordance with the in effect regulatory documents. The EPBC Act reforms and a broader bioregional plan has not yet been legislated and therefore do not form part of the statutory assessment framework for this project. The action has been proposed in line with the planning and zoning requirements under the longstanding SSP whereby the proponent seeks to develop an area zoned as 'Community Residential' under the SSP and retain areas zoned as 'Creek Line Open Space' under the SSP. It is noted these areas have changed slightly over time as a result of detailed design and ground-truthing investigations. The actual location of the creek line open space areas has been refined through the local approval process based on verification of high-value ecological values and top of bank mapping (refer PD Part A Section 2.4.3.10).

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 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.



In response to the second point raised by submitters with regard to the broader historical impacts that have occurred within the SSP, 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 refer PD Part A, Attachment A6) 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 128 ha of habitat for the koala, grey-headed flying-fox, regent honeyeater and swift parrot, the historical and proposed retention of 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 response to submission 0816, the proponent has proposed, subject to Council approval, to rehabilitate the sewer corridor located west of Opossum and Woogaroo Creek with planting of koala trees. While this previous impact is not related to the action, was not completed by the proponent and is located outside of the referral area, the proponent is committed to balancing environmental and wildlife areas with the proposed development footprint, which includes remediation of existing impacts where possible and to bolster the Opossum Creek and Woogaroo Creek corridor.



3. Response to Submissions – Specific Topics

3.1. Theme 1 – Habitat Quality Assessment

A total of 201 submissions which are reflective of templated responses, and 3 non-templated submissions were received which reference the habitat quality scoring of the impact site. Submissions reference a “downgrading” of koala habitat value and inconsistent application of scoring methods used to determine habitat quality. In addition, one submission raised concerns regarding the assessment process via Preliminary Documentation (submission 1684). Representative extracts are provided below.

2. Inconsistent and Unjustified Downgrading of Koala Habitat Quality

2.1 Departure from SHG’s Established Classification Practice

Across multiple Springfield-area assessments, SHG has consistently classified the same vegetation assemblages, mature eucalypt forest with intact canopy, deep gullies, perennial watercourses, and mapped primary koala food trees, as **high-quality koala habitat**.

2.2 Contradictory Classification at Springview

In the Springview assessment, these identical assemblages are abruptly downgraded to “moderate” or “locally constrained” habitat, despite SHG simultaneously assigning **habitat scores of 7**, which the *EPBC Koala Referral Guidelines* define as **habitat critical to survival**.

Template 17 Extract

The Department disagreed with the proponent’s habitat score and assessed it as 8/10 under the Koala habitat assessment tool (AIR - Part A.ii, p.10). Criteria included:

- Confirmed occurrence (+2)
- Multiple primary food trees (+2)
- Contiguous >500 ha landscape (+2)
- Existing mortality threats (+1)
- Recovery value (+1)

Template 13 Extract

Across other Springfield-area assessments, SHG has consistently classified the same vegetation assemblages—mature eucalypt forest with intact canopy, deep gullies, perennial watercourses, and mapped primary koala food trees—as **high-quality koala habitat**.

Yet in the Springview assessment, SHG abruptly downgrades these identical assemblages to “moderate” or “locally constrained” habitat, despite simultaneously assigning **habitat scores of 7**, which the *EPBC Koala Referral Guidelines* define as **habitat critical to survival**.

Template 6 Extract



This assessment process is wrong and should be **Environmental Impact Statement**. Due to the number of MNES and the large size of area wanting to be cleared, closer scrutiny afforded by EIS ought to be enacted. The block is steep with deep gullies and a complete cover of remnant vegetation. Such a variety of ecosystems and habitat niches ought to have more investigation by independent experts.

Submission 1684

Response to Theme 1

In response to the comments around the scoring of habitat quality for the koala and the observed departure from the department's scoring advice in the PD Information Request, there are some points of clarification that can be provided. The Koala Habitat Assessment Tool (KHAT) referenced by Template 13 is a now superseded scoring method which originates from the *EPBC Act referral guidelines for the vulnerable koala* (EPBC Koala Referral Guidelines). The EPBC Koala Referral Guidelines were discontinued from 12 February 2022, however, at the time of referral, controlled action decision and for a period following, the guidelines and KHAT were accepted and widely used. At the time of the controlled action decision and PD Information Request in 2020, the guidelines and KHAT were still in effect. The PD Information Request includes details of the information required to be provided in the PD and at times includes additional commentary or advice from the department, which can become superseded as regulatory documents and accepted methodologies change and evolve. As has occurred here, the KHAT quickly became superseded following the issuing of the PD IR and the Modified Habitat Quality Assessment (MHQA) method became the accepted habitat quality scoring method in favour of more scientifically robust and quantifiable metrics.

Additional details have been added to the final paragraph of the Foreword to clarify the purpose of the department advice notes and their relevance to the current version of the PD.

Additionally, several comments make note of the fact that the score of 7 out of 10 determined for the habitat quality of koala under the MHQA is inconsistent with the classification of habitat as critical for the species (e.g. Template 6 and 17). To clarify, following the department's review of the referral material, the project was deemed to have a significant impact on critical habitat for the survival of the koala as per the *Significant Impact Guidelines 1.1*, therefore requiring assessment by Preliminary Documentation. This fact is acknowledged throughout the PD (refer PD Part A p. iii). The score of 7 out of 10 does not suggest the habitat is not critical habitat for the species.

Template 6 and 17 state that there is differentiation in the scoring of koala habitat between projects within the Springfield locality, noting other projects have scored koala habitat as "high." A score of 7 out of 10 is considered moderate-high quality habitat for the koala. Variations in habitat quality can be observed even within the same vegetation patch and is influenced by on site condition metrics which can vary within a single patch of vegetation.

Submitter 1684 stated that assessment via Environmental Impact Statement (EIS) would be more appropriate for the site. For this type of project, assessment via Preliminary Documentation is the preferred and typical assessment approach by the Commonwealth Department. An EIS is typically required for projects such as large mines, major dams, ports, LNG, transmission corridors, or where World Heritage



values are involved. There is no mechanism through which the assessment process can be changed following the request for information by Preliminary Documentation.

3.2. Theme 2 – Other Protected Matters

A total of 22 submissions were received which referenced the potential for impacts on other protected matters listed under the EPBC Act. This included:

- *Merops ornatus* (Rainbow Bee-eater) – Migratory / Marine
- *Monarcha trivirgatus* (Spectacled Monarch) – Migratory / Marine
- *Monarcha melanopsis* (Black-faced Monarch) – Migratory / Marine
- *Hirundapus caudacutus* (White-throated Needletail) – Vulnerable
- *Macadamia integrifolia* (Macadamia Nut) – Vulnerable
- *Gossia gonoclada* (Angle-stemmed Myrtle) – Endangered
- *Coleus habrophyllus* – Endangered
- *Delma torquata* (Collared Delma) – Vulnerable
- *Egernia rugosa* (Yakka Skink) – Vulnerable
- *Furina dunmalli* (Dunmall's Snake) – Vulnerable

It is noted *Ninox strenua* (Powerful Owl), *Ornithorhynchus anatinus* (Platypus), *Tachyglossus aculeatus* (Short-beaked Echidna), *Chlamydosaurus kingii* (Frilled-neck Lizard), *Leichhardtia coronata* and *Gossia hillii* were also mentioned as species with potential to be impacted, however, as these species are not listed under the EPBC Act they have not been addressed as part of this response.

The proposal also impacts additional listed species and ecological communities, including:

- Grey-headed Flying-fox (*Pteropus poliocephalus*)
- Swift Parrot (*Lathamus discolor*)
- Regent Honeyeater (*Anthochaera phrygia*)
- Macadamia Nut (*Macadamia integrifolia*)
- Shaggy-leaved Coleus (*Coleus habrophyllus*)
- Angle-stemmed Myrtle (*Gossia gonoclada*)
- Lowland Rainforest of Subtropical Australia Threatened Ecological Community

Woogaroo Forest represents one of the last substantial tracts of remnant bushland in the Ipswich region. Given the cumulative impacts of urban expansion in South East Queensland, the loss of this habitat would contribute to irreversible biodiversity decline, reduced ecological connectivity, and long-term environmental degradation.

Submission 0883

The forest is home to important reptile species, including the Frill-necked Lizard (*Chlamydosaurus kingii*). This Australian icon has a fragmented and limited habitat in S.E. Qld. Woogaroo Forest is one of the few S.E. Qld populations of this lizard. The vulnerable (EPBC Act) legless lizard, the Collared Delma (*Delma torquata*) is highly likely to be present in Woogaroo Forest. Previous surveys have utilized ineffective methods to locate this species, perhaps due to a lack of understanding of the species' habits by those conducting surveys. This species is listed on the Australian Government Department of Climate Change, Energy, the Environment and Water "Threatened Species Action Plan 2022-23" as a "Priority Species". Below is taken directly from the Dept's advice:

Submission 1049



Reptiles:

Several vulnerable and regionally significant reptile species are known from the Ipswich and southeast Queensland bioregion and are likely to occur within Woogaroo Forest's remnant habitat. These include the **Collared Delma (*Delma torquata*)**, listed as Vulnerable in Queensland; the **Yakka Skink (*Egernia rugosa*)**, listed as Vulnerable under the EPBC Act; and the **Dunmall's Snake (*Furina dunmalli*)**, also Vulnerable under the EPBC Act. The forest's intact leaf litter, fallen logs, mature eucalypts, and undisturbed soil layers provide precisely the microhabitats these species depend on, yet the proponent's reports do not acknowledge or assess any reptile species at all. By failing to survey or even mention reptiles, the proponent has not met the basic expectations of a comprehensive fauna assessment under the EPBC Act, nor have they demonstrated that impacts to this important faunal group have been avoided, minimised, or even considered.

Submission 1036

Black-faced Monarch and Spectacled Monarch (migratory)

These two species are associated with Vine Scrubs and wetter Riparian Forests. They are regularly present all along Woogaroo and Possum Creeks. They are usually resident in the warmer months but can often be seen here at all times of the year. (Reference – records held by myself of birds over 20 years on a rainforest block on Woogaroo Creek, directly opposite the block in question).

This block has 3 deep gullies that provide a moister environment that will quite probably assist their movements across the area. Destruction of these gullies and the whole forest around them will have a serious disruptive effect.

Submission 1684

***Coleus habrophyllus* (previously known as *Plectranthus habrophyllus*) (endangered).**

This aromatic herbaceous plant is found scattered up the Woogaroo Creek catchment, on or near sandstone outcrops. It is found in nearby properties. It occurs on my property, directly across Woogaroo Creek from this block. It would certainly occur along the higher points of this development area. Lloyd Bird found it here in 1996 (see Herbarium records). It seems to move around a bit depending on the prevailing weather pattern. The total reshaping of this block would certainly destroy some occurrences of this plant and reduce the overall population. No sandstone outcrops are planned to be left. Those outcrops along gullies will be covered over or reshaped for stormwater infrastructure. This likely impact was not offset anywhere.

Submission 1684

Response to Theme 2

The potential for impacts on *Macadamia integrifolia* (Macadamia Nut), *Gossia gonoclada* (Angle-stemmed Myrtle) and *Coleus habrophyllus* are addressed in PD Part A Section 2.1.1 Table A4 and PD Part A Section 2.5.3.1.

Submission 1684 provides specific comment on the potential presence of and impact on *Coleus habrophyllus*. There is a known area of *Coleus habrophyllus* located south-west of the referral area, however, is not proposed to be impacted by the action. The referral area and adjoining areas have been traversed multiple times over multiple years by experienced flora ecologists and no specimens or microhabitat to support the species have been recorded within the referral area. The whole referral area



has been assessed as part of flora surveys (refer PD Part A Plan A8). SH Ecologists have over 10 years of experience in detecting this species as part of impact assessments within Greater Springfield. As a result, the species is considered to be highly detectable noting the specific habitat requirements and characteristic features. It is unlikely that any specimens, if present within the referral area, would not have been observed. The confirmed presence of a confined area of specimens south-west of the referral area provides additional certainty that survey effort to detect the species is sufficient.

Macadamia integrifolia and *Gossia gonoclada* are also known to occur within the adjacent Lowland Rainforest of Southern Australia Threatened Ecological Community to be retained within the vegetation retention area. Impacts to these species are considered unlikely as no specimens are proposed to be removed and mitigation measures including rehabilitation, erosion and sediment control, dust suppression and hygiene protocols are proposed to reduce the potential for any indirect impacts on these species caused by the action.

Submissions 1049 and 1036 discuss threatened reptiles with potential to occur and be impacted by the project. The Yakka Skink (*Egernia rugosa*) is native to the Brigalow Belt bioregion and the distribution and vegetation types where this species occurs does not align with the project site nor was it identified as a potential matter under the Protected Matters Search Tool. As a result, this species was not triggered assessed as part of the referral or PD. Dunmall's Snake was detected as a potential matter under the PMST at the time of referral, therefore was addressed in likelihood of occurrence assessments. However, similarly, the distribution and habitat for this species being located predominantly within the Brigalow Belt and associated vegetation types was determined not to align with the project area, therefore was identified as unlikely to occur (refer PD Part B, p. 70). As a result, no further assessment of this species was undertaken.

The Rainbow Bee-eater, Spectacled Monarch and Black-faced Monarch 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). While listed as marine / migratory species are MNES, these species are assessed differently to listed threatened and Migratory species. 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. For clarity, these details are provided in Section 2.1.1, Table A5 of the PD Part A.

Hirundapus caudacutus was not initially included as it was not a listed species in the PD Information Request and was not regarded as a species requiring further investigation or impact assessment through subsequent discussion with the department. *Delma torquata* was not included in the PD Part A for the same reason. For clarity, a more detailed review these species is now included in the PD Part A.

A table response to address *Delma torquata*, *Merops ornatus* and *Hirundapus caudacutus* is provided is provided in the table below, with reference to updates made to the PD Part A to reflect this information.



Additional Protected Matters Assessment

Species	EPBC Status	Act	Section of PD	Comments
<i>Merops ornatus</i> (Rainbow Bee-eater)	Marine, Migratory (Bonn Convention)	PD	Part A Section 2.1.1, Tale A4 and Section 2.5.4	The Rainbow Bee-eater was identified as part of ecological surveys (refer PD Part A Section 2.5.4). The Rainbow Bee-eater while listed as a marine species is a relatively widespread and common species in Queensland and for the reasons detailed above does not warrant further assessment under the EPBC Act. Section 2.1.1 and Table A4 of PD Part A has been updated to acknowledge the potential for impacts on this species noting, however, that a significant impact is unlikely.
<i>Monarcha trivirgatus</i> (Spectacled Monarch)	Marine, Migratory (Bonn Convention)	PD	Part A Section 2.1.1, Tale A4	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. The species is considered unlikely to occur..
<i>Monarcha melanopsis</i> (Black-faced Monarch)	Marine, Migratory (Bonn Convention)	PD	Part A Section 2.1.1, Tale A4	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) 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 with limited areas of vine forest. The species is considered to have a low likelihood of occurring. More suitable habitat attributes are located within the gully lines of Woogaroo and Opossum Creek.



Species	EPBC Status	Act	Section of PD	Comments
<i>Hirundapus caudacutus</i> (White-throated Needletail)	Vulnerable	PD	Part A Section 2.1.1, Tale A4, Section 2.3.7 and 4.1.6	The site contains suitable foraging habitat for the White-throated Needletail. The Flinders-Karawatha Bioregional Corridor which constitutes >20,000 ha of continuous remnant vegetation is located approximately 2 km east of the site and forms critical foraging habitat for the species. WildNet records indicate the species has previously been recorded on the site, however, this record was in the year 1990. Due to the presence of potential foraging and roosting habitat on-site and presence of a historical record, this species was assigned a likelihood of occurrence of 'moderate.' Further assessment is provided in PD Part A Sections 2.3.7 and 4.1.6.
<i>Delma torquata</i> (Collared Delma)	Vulnerable	PD	Part A Section 2.1.1 Table A5, p. 17-18, Section 2.3.8 and Section 4.7	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 project site with scattered areas of potential microhabitat confirmed through contemporary surveys. 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 within the referral area and Greater Springfield have noted lower quality habitats and no evidence of presence. The action area has been subject to historical fire disturbance with subsequent fragmentation occurring around the site associated with development.



Species	EPBC Status	Act Section of PD	Comments
			A review of records, survey data and disturbance suggest a low likelihood that the species is present within the action area. For greater confirmation, further assessment is provided in PD Part A Sections 2.3.8 and 4.7.

3.3. Theme 3 – Woogaroo Vine Scrub and Lowland Rainforest of Southern Australia TEC

A total of 134 templated submissions and 10 non-templated submissions cite the potential for impacts to the Lowland Rainforest of Southern Australia TEC (LRSA TEC) or the Woogaroo Vine Scrub. The majority of these submissions reference the potential for indirect impacts through edge effects including weed invasion and surface runoff. A representative example is Template 9 and submission 0766 below.

Submission 1036 references the presence of the Woogaroo Vine Scrub vegetation community and local ecological importance.

One submission submitted four times (1687, 1688, 1712, 1725) questioned the mapping of the extent of the vine forest and by extension, the TEC.

4. Lowland Rainforest of Subtropical Australia (Critically Endangered TEC)
The TEC is highly sensitive to disturbance. The proposal will expose retained vegetation to:

- Edge effects
- Weed invasion
- Altered hydrology
- Microclimatic changes

Scientific evidence shows edge effects penetrate **50–100 metres** into retained vegetation, meaning the TEC will no longer function as interior rainforest. For a **Critically Endangered TEC**, this constitutes **serious and irreversible harm**.

Template 9 Extract

5. Risk to Critically Endangered Rainforest The site boundaries adjoin patches of the Lowland Rainforest of Subtropical Australia (LRSA), a Critically Endangered ecosystem. The massive scale of earthworks, vegetation clearing, and resulting hydrological changes required for the subdivision poses a severe indirect threat to this fragile ecosystem. Opening the forest canopy and shifting soil facilitates the spread of aggressive weeds of national significance (such as *Lantana camara*) and risks introducing the deadly *Phytophthora cinnamomi* dieback pathogen into the rainforest patches.

Submission 0766



1. 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 2026 onwards, 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)
Apocynaceae	Leichardtia coronata	Slender Milkvine	V (NCA)

**Per Attachment (will send in separate email directly after submission) and link: https://bruceboyes.info/wp-content/uploads/2012/12/Conservation_of_Vineforests_in_South-East_Queensland.pdf*

Critically, there is not an appropriately suggested offsets for the important remnant of Scrub vegetation or the threatened species of plants at Woogaroo Forest. In my expertise and in the expertise of ecologists/scientists that have visited and taken measurements/data of the site, they believe that there is no appropriate offset for a forest as established as this. It would take some tree species up to 100 years to have hollows develop and for invertebrates and smaller animals be able to utilise those mature trees. Scrub vegetation cannot be offset and cannot be replaced, you cannot do a "like for like" substitution.

Submission 1036

I am a concerned local resident of Brookwater who doesn't have any scientific or mapping background, however I've seen the dry rainforest on site and was alarmed that there were sections not mapped within the direct development field. My only intention is to represent the ecological and biodiversity values of dry rainforest sections at different locations and show where they are with GPS coordinates and photographs. However, I was unable given time restraints to make it to all locations. Some locations I've only managed to pin point some points but not a 3D. I've done my best to represent those areas not GPS marked using shaded area. See Figures 3 and 4.



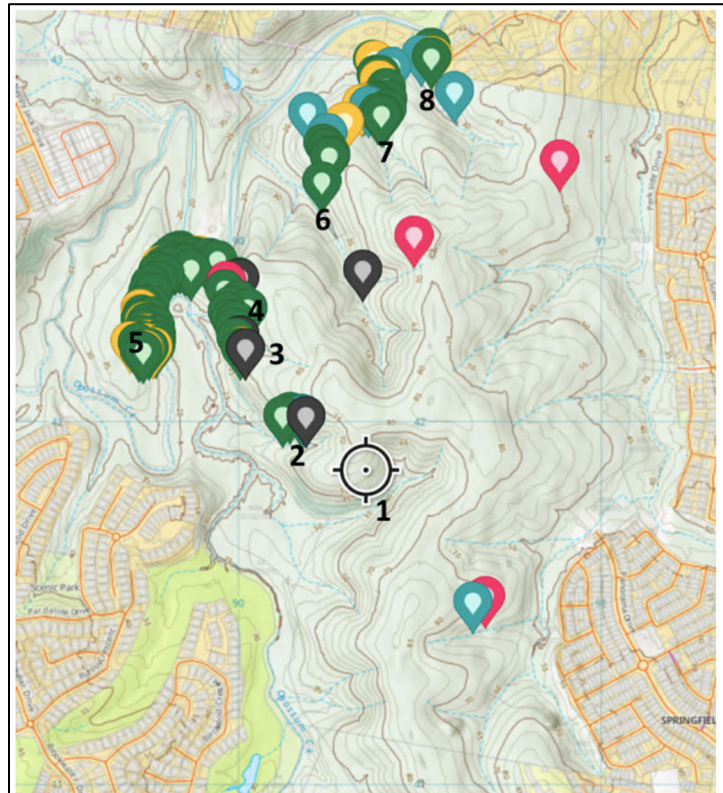
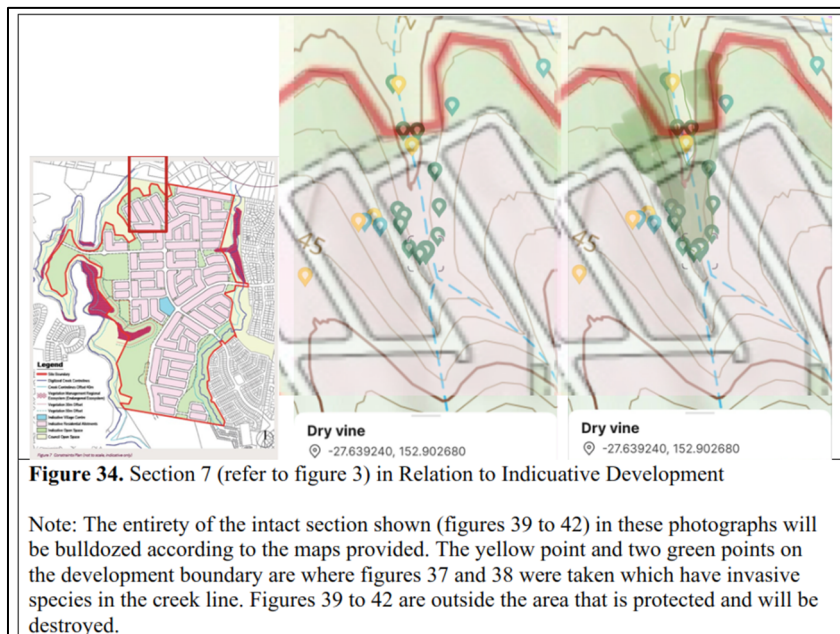


Figure 3. Ground-truthed Dry Rainforest locations in Green, elements and features in teal, Gray for rocky features, and yellow for invasive plants.



Submission 1687/1688/1712/1725

Response to Theme 3

Edge effects

The majority of commentary directed towards the Lowland Rainforest of Southern Australia TEC (LRSA TEC) was related to the potential for indirect damage to the TEC to occur as a result of the development via edge effects. While the LRSA TEC is not proposed to be directly impacted as part of the action, the



potential for indirect impacts during construction and operation of the development has been assessed within the PD Part A.

Potential indirect impacts identified include weed dispersal, dust generation, artificial light, sediment runoff and the introduction and spread of pathogens (i.e., *Phytophthora cinnamomi*) (refer PD Part A Section 4.8 and 4.9.3). As required under the LRSA TEC Conservation Advice, a minimum 50 metre setback has been applied to the ground-truthed extent of the LRSA TEC whereby all temporary and permanent development uses (including earthworks) are excluded.

In addition, a specific mitigation measures are proposed to reduce the potential for indirect impacts on the LRSA TEC including:

- Implementation of education awareness, hygiene and washdown procedures to prevent the spread of pathogens (refer PD Part A Section 5.3.6);
- Installation of shade cloth fencing for any works adjoining the LRSA TEC in order to reduce dust deposition (PD Part A Section 5.4.3);
- Weed management through the implementation of an approved Rehabilitation Management Plan or Bushland Management Plan (refer PD Part A Section 5.5). Refer to PD Part A Attachment A10 for the preliminary BMP;
- Implementation of best practice erosion and sediment control measures via implementation of site-specific Erosion and Sediment Control Plan (refer PD Part A Section 5.7.1); and
- Implementation of regular monitoring in line with an approved Rehabilitation Management Plan or Bushland Management Plan and where required under *P. cinnamomi* procedures to detect potential *P. cinnamomi* induced dieback (refer PD Part A Section 5.7.1).

In addition to the following mitigation measures, the LRSA TEC will be protected as council reserve when the retention area on-site is formally transferred to council as part of on and off-maintenance requirements post the completion of rehabilitation works. As mentioned above, a minimum 50 metre buffer will be delivered between the ultimate development use and the LRSA TEC in line with the Conservation Advice to reduce the potential for edge effects.

Presence of Woogaroo Vine Scrub

The LRSA TEC and Woogaroo Vine Scrub / Forest are referred to interchangeably in a number of submissions. This is relevant to note because they are not the same for the purposes of the EPBC Act.

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 has facilitated conservation and restoration initiatives primarily driven by Lloyd Bird in the late 1990s.

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, elements of it may be associated with the LRSA TEC.



The Woogaroo Vine Scrub is not identified as a Matter of National Environmental Significance, therefore does not require assessment under the EPBC Act. However, it is acknowledged that parts of the Woogaroo Vine Scrub may align with the LRSA TEC. During surveys completed as part of the referral, desktop and on-ground indicators of the LRSA TEC were identified within and adjoining the referral area as confirmed through a combination of desktop analysis and field verification surveys (refer PD Part A Section 2.3.1).

Mapping of vine forest / TEC

Submission 1687/1688/1712/1725 questioned the accuracy of the delineation of the LRSA TEC presented in the PD Part A. The submitter used physical indicators of vine forest on-ground within and adjoining the project area to delineate the extent of vine forest.

It is important to note that elements of dry rainforest are acknowledged to occur within the interface areas of Woogaroo Creek, however, these do not necessarily confirm the presence of the LRSA TEC.

The identification and delineation of the LRSA TEC is principally determined by using the key diagnostic characteristics (KDCs) and the condition thresholds provided in the *Lowland Rainforest of Subtropical Australia listing advice 2011* ('LRSA TEC Listing Advice'). The process for defining and delineating the extent of the TEC involved a combination of desktop review of corresponding regional ecosystems, antenna-based GPS mapping using the presence of characteristic species of the TEC and assessment against the key diagnostic characteristics, as detailed in PD Part A Section 2.3.1.

Importantly, it is noted that the one of the key indicators of the LRSA TEC is being hyper-diverse i.e., containing more than 30 native woody species. While a number of species consistent with the LRSA TEC were identified within the vegetation areas, a total of 30 woody species was not observed, likely attributed to the ongoing presence of degrading factors and historical disturbance. These assessments were completed by a Saunders Havill Principal Ecologist with more than 20 years of experience in conducting flora surveys therefore there is a high level of confidence that species identification was completed accurately. In this case, the precautionary principle was applied and the delineated patches were conservatively called LRSA TEC. However, failure to meet this key diagnostic criteria would otherwise indicate the community is not present (refer PD Part A Section 2.3.1).

3.4. Theme 4 – Site Design and Avoidance-Mitigation Hierarchy

A total of 112 submissions, linked to a single templated response (Template 5), and 5 non-templated submissions raise issue with the development design noting the application of the avoidance-mitigation hierarchy has not been satisfied.

Under the EPBC Act, avoidance is the primary mitigation requirement. The proponent has not demonstrated that avoidance options were adequately considered or that alternative designs were explored to prevent impacts on MNES.

Given the scale of clearing and the presence of habitat critical to survival, avoidance, not offsetting is the only lawful and ecologically defensible pathway.

Template 5 Extract



The proposal involves broad clearing of Koala habitat, broad topsoil stripping, bulk earthworks cut of the ridgeline and bulk fill of the gullies and streams.

This will result in few remaining eucalyptus trees and will be critical knock-out blow to the population of Koalas and other known threatened and iconic species inhabiting this forest.

The developer admits in this proposal to causing **severe impacts** on a number of MNES due to the wholesale destruction of habitat that is required to build this development.

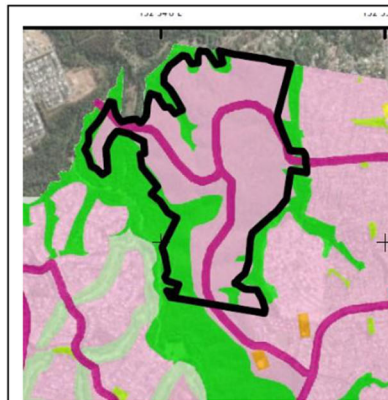
The developer admits in this proposal to taking NO AVOIDANCE and NO MITIGATION for impacted MNES.

Submission 0061

Springfield Structure Plan (SSP)

The proponent talks about the SSP as being virtual approval for any sort of urban development. It is the Master Plan. Yet they happily violate this plan whenever they feel like it. Areas zoned as “green space” disappear under housing. The road network is based on the current landscape, yet is somehow easily ignored. Retaining the current landscape is not considered. The Aims and Objectives of the SSP are obviously rejected, as this proposal does not meet any of them. Council does **not** assess whether any development meets the SSP as it is a separate document approved by the State. In fact, nobody seems to assess projects against the SSP.

Approval of clearing, by the Minister, for a project that does **not** meet the SSP seems rather perverse, as the SSP is quoted frequently in the Preliminary Documentation, yet plays no part in actual urban design.



SSP – Showing more Green Space and retention of gullies and ridgeline.

Submission 1684

‘Not clearing “undevelopable” land along Possum Creek’, clearly zoned as “open space”, as suggested, is NOT a strategy for Avoidance or Mitigation. It is an irrelevant nonsense. This is all about mitigation of impacts caused by the clearing itself. 134Ha is a huge area to totally clear. Not much avoidance has happened here.

Submission 1684

Response to Theme 4

A number of submissions claim no avoidance and mitigation is proposed and that the development design is in conflict with the SSP (submission 1684). The details of all avoidance and mitigation measures are provided in detail in the PD Part A. Avoidance and design minimisation measures include:

- The retention of 27.5 ha of vegetation including remnant eucalypt woodland, vine forest and the entirety of the ground-truthed LRSA TEC (refer PD Part A Section 1.1.2). Notably, this has been increased from 18.7 ha to retain the western section of the site adjoining Woogaroo Creek which was previously proposed as residential land under the SSP and in earlier structure plans. It is noted



the proponent has also previously dedicated 49.2 ha of their broader landholdings to Ipswich City Council (ICC) within the Opossum and Woogaroo Creek corridors resulting in a total 76.7 ha retention area attributed to the Springfield Residential Development (refer PD Part A Section 5.2). Of the broader landholdings this is reflective of a retention area of approximately 90 ha combining adjoining areas of O'Dwyer's Creek tributaries and Kalina Village 1 environmental corridors (EPBC 2014/7306). The proponent has worked collaboratively with ICC and the DCCEE over several years to achieve a balanced outcome.

- Avoidance of waterways and associated important tributaries, with the provision of a minimum 40 m setback in line with ICC requirement (refer PD Part A Section 5.2).
- Avoidance of direct clearing impacts to the LRSA TEC and provision of a minimum 50 m setback which excludes all development uses (including earthworks) within the 50 m buffer area, in line with the recommended buffer distance in the LRSA TEC Conservation Advice (refer PD Part A Section 4.8.2).

In response to the comment that the development design does not align with the mapped areas under the SSP, the SSP is intended to function as high-level structure land use concept master plan with development areas to be refined through the local approval process including Local Area Plan and Area Development Plan approvals. This process includes consideration of site assessment and ground-truthing to ensure development design is balanced in terms of site constraints (refer PD Part A Section 1.1.3). As detailed above, a greater volume of vegetation retention area is proposed to be delivered than what was initially planned under the SSP and seeks to retain higher value developable areas adjoining Opossum Creek and Woogaroo Creek (refer PD Part A Section 5.2 for more details on design changes to accommodate greater retention). A key driver for increasing the shape and volume of retention area was to reduce the potential for edge effects and ensure corridor functionality as a wildlife corridor is supported as these concerns were raised by the department earlier in the assessment process.

It is noted that if the SSP were to be adhered to as proposed, as raised as a concern by submitter 1684, this would result in the loss of ground-truthed areas of Lowland Rainforest of Subtropical Australia TEC and ecotonal areas as the SSP zoning does not consider site-specific constraints.

At a minimum, the following mitigation measures are proposed:

- Implementation of an MNES Management Plan to form a guide for management measures required to be implemented over the course of the project (draft plan provided as part of this PD) (refer PD Part A Section 5.3.1).
- Preparation Vegetation Clearing and Fauna Management Plans (VCFMP) for specific clearing phases (overarching plan provided as part of this PD) (refer PD Part A Section 5.3.2).
- Pre-clearance measures including installation of fauna friendly tree protection fencing around vegetation clearing areas (refer PD Part A Section 5.4.1).
- Engagement of a Department of Environment, Science, Tourism and Innovation (DETSI) registered fauna spotter catcher and AQF Level 5 Arborist to supervise clearing activities (refer PD Part A Section 5.3.4).
- Preparation of Environmental Pre-clearance Prestart Procedure (refer PD Part A Section 5.3.3).
 - Preparation of Environmental Pre-clearance Packages.



- On-site environmental pre-start meeting
- Installation of temporary koala exclusion fencing around construction areas prior to construction commencing (refer PD Part A Section 5.4.1).
- Installation of temporary shade cloth fencing in works areas adjacent to the LRSA TEC to protect the LRSA TEC from excessive dust (refer PD Part A Section 5.4.3).
- Preparation of a Construction Environmental Management Plan(s) and Erosion and Sediment Control Plan in consultation with the civil contractor and inclusion of specific management measures to limit the introduction and spread of *Phytophthora cinnamomi* due to works (refer PD Part A Section 5.3.6).
- Implementation of Rehabilitation Management Plan or Bushland Management Plan including weed management, planting and monitoring of retained vegetation areas (refer PD Part A Section 5.5).
- Subject to council approval, rehabilitation of the previously cleared sewer line located west of Woogaroo and Opossum Creek. While this previous impact is not related to the action and it located outside of the referral area, the proponent is committed to balancing environmental and wildlife areas with the proposed development footprint, which includes remediation of existing impacts where possible (refer PD Part A Section 5.5.1).
- Incorporation of fauna sensitive design including the provision of a full-size fauna culvert at the Mur Boulevard crossing where the proposed road intersects O'Dwyer's Gully (refer PD Part A Section 5.6.1).

In summary, the proponent has rigorously applied the avoidance and mitigation hierarchy which has been achieved through consultation with the Commonwealth department and local council to reduce impacts to MNES and achieve a balanced environmental and development outcome.



3.5. Theme 5 – Impact to the Koala and Population Processes

A total of 411 submissions including a number of templated style submissions reference impacts to the koala as a primary concern with the key concern raised that population-scale processes and population viability have not been thoroughly assessed. This also includes commentary on the genetic uniqueness of the Ipswich koala population and individuals occurring specifically within the action area (submission 0938).

These submissions are considered to differ from general comments regarding impacts to critical habitat as they are focused on a specific component of the impact assessment, being population viability after impacts are completed.

The BAAM Connectivity Analysis identifies multiple adjacent EPBC projects within the broader home-range landscape (Attachment A3, p. 2). The documentation confirms that the subject site forms part of a 660 ha functional koala landscape (Attachment A3, p.2; AIR, p.10). Urban expansion within Springfield and surrounding areas is ongoing.

Peer-reviewed ecological research demonstrates that:

- Koala populations decline under sustained habitat loss and fragmentation (Rhodes et al. 2015; McAlpine et al. 2015);
- Extinction risk increases non-linearly once landscape habitat cover falls below threshold levels;
- Cumulative habitat and resource loss can accelerate decline in small or spatially constrained populations.

The Department's Additional Information Request specifically raised cumulative impact considerations at the broader landscape scale (AIR, p.12). While Attachment A3 provides a landscape-scale habitat connectivity assessment, it does not include quantitative demographic population viability modelling or extinction risk analysis of the Springfield koala sub-population under cumulative clearing scenarios.

Connectivity modelling evaluates structural habitat linkage. It does not quantify population persistence probability, demographic stability, or extinction risk over time.

In a landscape already subject to sequential development pressures, the absence of demographic modelling limits the capacity to determine, on evidence, whether incremental clearing across multiple projects will maintain or erode long-term viability at the relevant population scale.

Conservation science recognises that population collapse in fragmented landscapes typically arises from cumulative effects rather than single projects in isolation. In this context, the relevant statutory question is not whether this action alone causes extinction, but whether, when added to existing and foreseeable pressures within the same functional landscape, it materially increases the risk of non-viability.

Template 13 Extract

Cumulative Impacts in the Springfield–Woogaroo Landscape

The site forms part of a **660-ha koala landscape** already under pressure from multiple adjacent developments. Cumulative clearing—not isolated projects—is the primary driver of koala decline in SEQ.

The proponent provides **no population-level viability modelling**, despite the known cumulative pressures. Under s 136 of the EPBC Act, the Minister must consider cumulative impacts. The evidence demonstrates that further clearing will materially increase the probability of local population failure.

Template 16 Extract



3. Microclimatic Refugia and Climate Resilience

The retained forest within the Woogaroo landscape provides documented **microclimatic buffering**, including reduced ambient temperatures, increased humidity, and thermal refuge during heatwaves. These conditions are essential for koala survival under projected climate scenarios.

The loss of these refugia constitutes a **material reduction in the species' capacity to withstand climate-related stressors**, a factor directly relevant to the Minister's obligations under the EPBC Act.

Template 5 Extract

Unique Koala Population with Greater Climate Resilience

Koalas at Lot 9999 Forest are likely to possess greater climate resilience, because they have already adapted to a harsher, drier vegetation community dominated by drought-tolerant eucalypt species.

Research from the Australian National University shows that koalas are *"dietary specialists whose survival hinges on the chemistry of eucalyptus leaves,"* and that individual populations adapt to the specific nutritional and moisture profiles of their local trees, often relying on *"a narrower suite of trees whose leaves offer the right balance of water, fibre, nutrients and defensive compounds."* This same research emphasises that tougher, lower-moisture leaves require greater physiological effort to process due to *"high levels of indigestible fibre"* and elevated plant toxins, meaning koalas persisting in dry sclerophyll forests (within Lot 9999) are already coping with more demanding foliage.

Climate studies further show that drought-tolerant eucalypt forests provide *"shaded microclimates that help [koalas] survive heat and drought,"* and that leaf chemotypes vary significantly between regions, with what constitutes a high-quality food tree in one area becoming suboptimal only kilometres away.



This evidence supports the conclusion that the koala population within Lot 9999 is already dependent on robust, drought-resilient tree species and adapted to lower-moisture & higher-fibre foliage. Therefore experts advise these Koalas to be more climate-ready than populations in softer coastal habitats.

Translocating koalas is widely considered a last-resort measure rather than a long-term solution, because it often fails to address the root causes of their decline, such as habitat loss and fragmentation. Translocating is fraught with risks, often resulting in high mortality rates and low success in establishing new, healthy populations.

Submission 0938



As you are no doubt aware, there are several studies of causes of mortality and morbidity in SEQ koalas (V. Gonzalez-Astudillo 2017), and the complex relationship between disease (mainly chlamydia), death and injury from trauma (vehicle strikes, dog attack etc), hyperthermia, starvation during droughts and the long-term adverse effects of climate change that is driving our koalas to extinction. The extinction of eastern Ipswich koalas is a very real, on-going experience for me, as I see individuals continuing to die, most recently with the death of a healthy male on Ipswich Motorway near the Redbank turnoff, and a mother and dependent joey on Redbank Plains Road. As well as koalas displaced by clearing, for example a koala in the work yard of the tyre recycler at Austin St, off Redbank Plains Road.

...

I note that the report speaks about sequential clearing that will allow koalas in area to move to “the safe haven”, and temporary “fauna exclusion fencing”, but it does not actually describe where koalas will go once their home range habitats have been destroyed. It only seems to deal with protecting any koalas that happen to be on a given site at the time of clearing, for example with “safe wildlife movement opportunities (during construction)”. It does not specifically address how the removal of many hectares of mature forest will be mitigated; i.e. where the koalas that used that forest will now live, eat, shelter.

Submission 1308

Response to Theme 5

The ability for the local koala population to persist alongside the completion of proposed vegetation clearing impacts and operation of the action was a key consideration of the impact assessment and avoidance and mitigation strategy.

It is noted that clearing will be completed progressively under a staged clearing approach. The project is divided into two broad staging areas being Stage 1 – Village 2 and Stage 2 – Village 3. Stage 1 – Village 2 will be cleared progressively in sub-stages and will be completed in its entirety before clearing and construction impacts in Stage 2 commence. The progressive rollout of clearing impacts from a population viability perspective will mitigate impacts of habitat loss as it will reduce ecological shock, allow fauna to disperse safely and maintain habitat continuity.

Reference to the staged clearing approach is detailed in Section 1.2 of PD Part A. While it is not an additional mitigation measure, it is a factor that will assist in buffering the local wildlife, particularly the koala, from impacts associated with the action. Further details regarding this as a mitigating factor in the development impact is provided in PD Part A Section 4.2.1.

Template 13 states “While Attachment A3 provides a landscape-scale habitat connectivity assessment, it does not include quantitative demographic population viability modelling or extinction risk analysis of the Springfield koala sub-population under cumulative clearing scenarios.” Additionally, Template 16 states “The proponent provides no population-viability modelling, despite the known cumulative pressures.”

BAAM Ecological Consultants were engaged to complete a third-party review of baseline functional connectivity and population dynamics and probable changes under the proposed development scenario. This is provided in the form of the BAAM *Koala Connectivity and Sustainability Analysis* provided at Attachment A3 of PD Part A. Importantly, the assessment considered combined impacts from the



adjoining Scenic Precinct (EPBC 2020/8651) and Peninsula Precinct (EPBC 2020/8629) projects. In doing so, BAAM have considered a range of data including an assessment of koala abundance and habitat connectivity locally and within a broad dispersal range. Koala abundance assessments considered results of the direct and indirect evidence of koala abundance including thermal drone audit conducted within the land and adjacent areas, Spot Assessment Technique surveys, contemporary and historical records and koala detection dog surveys commissioned by Ipswich City Council.

The results of the drone survey detected 2 koalas within the 235-ha survey area including 1 sighting within the referral area, suggesting a low population density. This was concluded as being consistent with literature detailing estimates of Ipswich Koala population. The analysis concluded that the population can be reasonably expected to be impacted by the combined loss of >200 ha of vegetation across the dispersal range, however, that the preservation of functional corridors adjoining Opossum and Woogaroo Creeks, linear habitat links and a sizeable, albeit reduced, inner-city patch will support persistence of the koala population (refer PD Part A, Attachment A3).

Submission 0938 suggests that the koalas present within the action area represent a unique population in their specialised adaptations to the habitat present, stating "Koalas at Lot 9999 Forest are likely to possess greater climate resilience, because they have already adapted to a harsher, drier vegetation community dominated by drought-tolerant eucalypt species." It is acknowledged that the Ipswich region supports a regionally significant and genetically distinctive population of koalas. The following detail has been added to the PD Part A Section 2.3.2 (d) to more explicitly address this:

Ipswich supports a regionally significant and genetically distinctive population of koalas. Population size estimates based on a 2016 study by Bussey and Ellis suggest suggested a conservative population size of at least 4,000 koalas across the Ipswich LGA. The Rhodes et al. (2015) survey also indicates that the koala density in Ipswich is approximately 0.033 koalas/ha based on surveys completed in 2011 and 2012. It is noted that recent data-driven population estimates for the koala published in May 2025 by the National Koala Monitoring Program (NKMP) in collaboration with the CSIRO suggest a higher population estimate of koala populations within Queensland than previously estimated. Specific estimates for the Ipswich LGA have not been published.

Genetic analyses of Ipswich koala populations such as Kjeldsen et al. (2015) indicate the Ipswich-Beaudesert population is genetically distinct from coastal koala populations, increasing its conservation value as a source of genetic diversity for the region. Importantly, koalas in Ipswich are known to be regularly sighted within fragmented and peri-urban landscapes including riparian corridors, roadside vegetation and isolated trees in grazing paddocks (ICC, 2017).

The koalas that utilise the vegetation within the action area, are unlikely to be genetically different to the broader Ipswich population. Noting the above, this factor was considered when seeking the locations for offsets. The Mount Walker West offset area is located within the Ipswich LGA and comprises a 225.6 ha parcel of land containing opportunities for habitat creation and enhancement that will provide additional habitat and refuge for the Ipswich koala population. While an impact on the koala population is likely to occur as a result of the action (referencing the BAAM study) the low density of the koala population is predicted and retention of corridor connections, which are substantially larger than those historically delivered under the SSP, are anticipated to ensure the koala population persists within the local area (refer PD Part A Attachment A3).



Submission 1308 among others raised concern with the potential for increased threats as a result of the development on koala including threats, which could include impacts from dogs, vehicle strike and displacement. It is acknowledged the development has the potential to increase threats to koalas through increased vehicle movements, domestic dog presence and the displacement of individuals from habitat areas proposed for development. Vehicle strike and dog attack are recognised as key causes of koala injury and mortality in urban and peri-urban landscapes. Notwithstanding, the development is located within a broader landscape that retains substantial habitat and connected vegetation corridors, including waterway corridors which provide opportunities for movement, refuge and dispersal. The retention of these areas will assist in maintaining landscape connectivity and reducing the frequency with which koalas are required to move through developed areas. While some localised displacement may occur during construction and habitat modification, the availability of adjacent retained habitat is expected to facilitate relocation into suitable surrounding areas. In light of these known threats, mitigation measures are proposed to reduce the potential for ongoing impacts during the operation of the development including fauna sensitive design (discussed in PD Part A Section 5.6.1, 5.6.2, 5.6.4 and 5.6.6) which include:

- Construction of a full-size fauna culvert at the Mur Boulevard crossing.
- A mix of signage types will be used throughout the development to raise awareness to residents and vehicles including koala awareness, dog on leash, environmental awareness and vehicle “go slow” signage along esplanade roads.
- Landscaping palettes used for streetscape and parkland design will exclude koala foraging trees to reduce the potential for koalas incidentally entering the development areas.

3.6. Theme 6 – Impacts to the Greater Glider

Submissions were received on the project’s assessment of the greater glider and potential impacts, which consisted predominantly of templated submissions (total 217) with 2 non-templated submissions noted. These ranged from broad concerns regarding the survey methodology utilised to detect presence, the location of known greater glider populations relatively close to the site, and the presence of suitable habitat within and adjoining the site. Submissions that refer to impacts to critical habitat generally with reference to the greater glider are addressed in Section 2.1.

It is noted references to the greater glider are made in a number of submissions, however, the submissions considered in this theme are different in that they reference content which is more specific to the assessment in the PD.

A variety of templates with overlapping content were received on this topic. Two extracts of representative templates are provided below.

would be heavily impacted. The report also rated the chance of finding Greater Gliders as “unlikely”, in spite of their historical occurrence here and recent sightings in the close vicinity at Spring Mountain. There is also a number of large, and therefore old, *Eucalyptus fibrosa*, that are a feature of the higher parts of the ridgeline, that, no doubt, provide a multitude of hollows. It therefore ought to be **highly likely** that Greater Gliders would be found here. There are recent unconfirmed reports of Greater Gliders here. Yellow-bellied Gliders have recently been seen.

Submission 1684



3. Lower Survey Standards for Greater Gliders Compared to SHG's Own Practice

Greater Gliders have low detectability and require multi-season, whole-patch surveys and detectability modelling to avoid false negatives. In other regional assessments, SHG has applied these higher standards.

At Springview, however, SHG:

- surveyed only a subset of the ~162 ha forest
- relied on discrete transects and drone paths
- did not model detectability
- treated non-detection as evidence of absence

These methods fall below contemporary expectations for an Endangered hollow-dependent species and below SHG's own demonstrated practice. Given confirmed Greater Glider populations within 2–4 km of the site, this reduced survey effort introduces substantial uncertainty.

Under s 136, the Minister cannot be satisfied that significant impacts will be avoided when survey methodology is internally inconsistent and scientifically insufficient.

Template 6 Extract

4. Greater Glider (*Petauroides volans* complex) – Residual Uncertainty and Incomplete Exclusion of an Endangered MNES

The Greater Glider is listed as Endangered under the *Environment Protection and Biodiversity Conservation Act 1999*, with this conservation status applied after commencement of the earlier survey campaigns relied upon in the Preliminary Documentation.

This change in status is material and elevates the standard of certainty required to exclude presence or significant impact.

4.1 Habitat Context, Site Scale and Nearby Records

The referral confirms that the proposed action relates to a 162 ha site, with an impact footprint of approximately 136 ha, the majority of which is mapped as remnant native vegetation (Part B). This establishes that conclusions regarding species absence are being extrapolated across a large and heterogeneous forested landscape.

The documentation acknowledges that Greater Gliders are known to occur within the surrounding landscape, including confirmed populations in the Greenbank Military Training Area (approximately 2–2.3 km east) and White Rock Conservation Park (approximately 3.6 km south-west), with contemporary verified records within the past decade (Part A.i).

These nearby populations confirm that the species persists locally and that the broader forested matrix remains ecologically relevant to an assessment of likelihood of occurrence.

4.2 Survey Methodology, Spatial Coverage and Detectability Constraints

Targeted surveys included nocturnal spotlighting using transect and meander approaches across multiple nights and seasons, supplemented by wildlife aerial thermal drone surveys with on-ground verification (Parts A.i and A.ii).

Although the survey effort was extensive, it necessarily relied on sampling along discrete spotlight transects and aerial flight paths, rather than continuous coverage of the full 162-hectare site or the broader habitat mosaic within and adjoining the impact footprint. In a large and structurally variable remnant forest, the area directly surveyed therefore represents only a subset of the total habitat potentially available to hollow-dependent arboreal fauna.



The documentation states that surveys were undertaken under generally favourable environmental conditions (Part A.ii, p.156). Notwithstanding this, the documentation does not demonstrate that detectability was optimised or quantified for the Greater Glider, particularly in relation to lunar phase, seasonal activity patterns, or structural use of tree hollows. Although initial surveys were undertaken during warmer months, peer-reviewed research indicates that Greater Glider detectability varies with behavioural and structural factors rather than temperature alone, and cannot be assumed to be maximised in any single season (Wintle et al. 2005). Additionally, peer-reviewed studies further indicate that detection rates are influenced by habitat structure, survey conditions, and observer constraints, and that non-detection can occur even where individuals are present at low densities (Wintle et al. 2005).

4.3 Structural Detection Limits

Both spotlighting and thermal imaging are subject to inherent structural limitations. Greater Gliders are obligate hollow-dependent mammals, and individuals occupying tree hollows are not detectable via thermal sensors and may evade visual detection during spotlighting.

Accordingly, non-detection reflects absence of observation under specific survey conditions, rather than conclusive exclusion across the site, as a whole.

4.4 Habitat Structure and Irreversibility

The vegetation within the impact footprint is described as remnant eucalypt forest with retained hollow-bearing trees and varying age classes (Parts A.i and A.iii), and Part B confirms that the site remains largely vegetated despite surrounding urbanisation.

Tree hollows form over many decades. Removal of hollow-bearing trees therefore constitutes irreversible structural habitat loss within timeframes relevant to recovery of an Endangered species.

4.5 Temporal Disconnect Between Survey and Impact

The proposed action is intended to occur several years after initial survey effort commenced. The Greater Glider's conservation status was elevated to Endangered during this period. The documentation does not demonstrate that survey conclusions were recalibrated to reflect this higher conservation status or reassessed against post-uplisting evidentiary standards.

Template 13 Extract

This 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 1694

Response to Theme 6

While relatively detailed commentary is provided in the above submissions, 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 Part A Section 2.3.6 (d)).
- Suitable foraging and denning habitat to support the greater glider is present within the action area and broader vegetation patch (refer PD Part A Section 2.3.6 (c)).

The focus of the commentary received was on the unsuitability or lack of species presence surveys. 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. Template 13 states under Point 4.2 "Although the survey effort was extensive, it necessarily relied on sampling along discrete spotlight transects and aerial flight paths, rather than continuous coverage of the full 162-hectare site or the broader habitat mosaic within and adjoining the impact footprint" and under Point 4.3 "Both spotlighting and thermal imaging are subject to inherent structural limitations...Accordingly, non-detection reflects absence of observation under specific survey conditions, rather than conclusive exclusion across the site, as a whole."

The following passage has been added to the PD Part A Section 2.3.6 (e).

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 1694 states that "thermal drone surveys are required in winter to appropriately survey for this species in subtropical regions such as the referral area." As stated above, thermal drone surveys were completed during winter in August 2024 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).

While species detection surveys were completed, this was considered supplementary to the key focus of the assessment which is the functional disconnection of the habitat patch within which the action is located, from nearby greater glider populations. Due to the presence of severe barriers to movement including railway lines, motorways, arterial roads and fragmentation, the likelihood of a greater glider to traverse these barriers and subsequently occur within the action area or adjoining vegetation is considered highly unlikely (refer PD Part A Section 2.3.6 (d) and Section 4.1.5). The absence of any contemporary records or confirmed sightings within the last 20 years within the habitat patch also supports this conclusion. It is noted the review of fauna spotter catcher data used to corroborate the assessment of a



low likelihood of occurrence (refer PD Part A Section 2.3.6 (e)) has been expanded to include records inclusive of 2026.

3.7. Theme 7 – Offsets (Specific)

A total of 21 templated-style submissions and 6 non-templated submissions make comment on the suitability of the offset proposal. Unlike the submissions reviewed as part of Section 2.3, this section includes submissions that provide more tailored and project-specific commentary on components of the offset proposal such as projected habitat quality improvements, scoring metrics and confidence. It is noted a number of the submissions identified overlap with those reviewed as part of Section 2.3. This section aims to extract and provide responses to project-specific commentary.

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

Comment – Quality improvements

5.2 Time-lag, modelling horizon and habitat maturity

The Offset Area Management Plans define an “Offset Period” of 20 years (OAMP, PD Part A.iii, Glossary, p. viii), with adaptive management proposed for the life of the offset (OAMP, PD Part A.iii, p. 90). The Offsets Assessment Guide modelling framework is similarly capped at a 20-year horizon.

The impact, however, is immediate and permanent, commencing upon clearing.

While the documentation describes the current condition of the proposed offset land and includes planting and regeneration targets, it does not demonstrate equivalence with the impacted habitat, nor identify a clear or realistic timeframe within which the offset sites would attain a comparable ecological state, particularly for mature forest attributes.

Notably, offset performance is partly predicated on projected canopy cover targets of approximately 70–80% by Year 20 (PD Part A.iii). Canopy cover is a coarse structural metric and does not capture key ecological attributes relevant to MNES viability, including hollow availability, forage stability, vertical structural complexity, and microclimatic integrity. These attributes develop over extended timeframes and underpin the functional value of habitat assessed as critical to survival.

Template 13 Extract



This submission relates to improving Koala and GHFF habitat. I am concerned the offset site/s may be unsuitable³ and/or inadequate by dint of unsubstantiated, and therefore potentially exaggerated, claims of habitat quality improvement. I have selected the Koala assessment units for the Esk, Avonvale and MWW offset sites to illustrate my concerns.

Unfortunately, the PD and OAMPs do not provide evidence⁴ demonstrating the moderate-high likelihood of the *very large improvements in quality* for Koala within 20 years. Evidence supporting 10, 15 and 20 year outcomes are especially important with the regulator prioritising contemporary matters and objectives.

The OAMPs contain justifications for values selected, such as:

By removing cattle access, managing weeds, undertaking supplementary plantings using species and densities appropriate for pre-clear REs, and introducing maintenance and fire regimes appropriate for the pre-clear REs, it is expected these attributes will achieve the maximum scores for all AUs. (Esk, Table 6.8)

Usage (habitat type and evidenced usage): *It is anticipated that under the management actions specified under management actions 1 to 8, Koala usage of the site as a measure of habitat type and evidence usage will increase. It is considered that with the reinstatement of key habitat values, the site will be considered breeding habitat by Year 20 as per the conservation advice. (MWW AU1, Avon AU4)*

Approximate Density: *It is anticipated that under the management actions specified in management actions 1 to 8 at least low level Koala activity (<22.52% scats recorded using the East Coast med-high population category) will be recorded. (MWW AU2, Avon AU2)*

Weed cover: *Weed coverage will reduce to less than 5% over the course of 10 years by specific management actions 2, 6 & 7. (MWW AU2, Avon AU6)*

The above do not constitute 'evidence'. They are apparently plausible predictions that, on close analysis, lack scientific robustness to support evidence-based, precautionary decisions.

Submission 0080

Response to Comment – Quality improvements

Template 13 states that the offset proposal “does not demonstrate equivalence with the impacted habitat, nor identify a clear or realistic timeframe within which the offset sites would attain a comparable ecological state, particularly for mature forest attributes.” Offset equivalence has been addressed in Section 2.3. Quantifiable metrics and repeatable methodologies were used to determine the baseline habitat quality for each offset area. Performance targets have been developed to clearly demonstrate how habitat quality improvements are expected to occur over the 20 year offset management period with active management. These are detailed in each Offset Area Management Plan (refer Attachments A14, A15 and A16). A detailed monitoring program which includes a combination of annual, bi-annual monitoring and major habitat quality monitoring at Years 5, 10, 15 and 20 are proposed where baseline survey methodologies are repeated to track habitat quality improvements. The projected habitat quality improvements and metrics used represent objective and quantifiable improvements that focus predominantly in changes to site condition that will occur with the implementation of restoration techniques including broadscale revegetation and weed management. Where monitoring indicates performance targets are not being achieved as proposed, an adaptive management and corrective action framework will be enacted. Each OAMP includes an adaptive management and corrective action framework which is designed to deal with the uncertainty and risk of OAMP implementation (refer Attachments A14 Section 8, A15 Section 9 and A16 Section 8). These include details of additional actions and triggers required where performance



criteria aren't being met, and consideration of external factors such as extreme weather events that may hinder offset area management and improvement.

In response to Submission 0080, habitat quality improvements for the metrics listed above being Koala usage (habitat type and evidenced usage), Approximate Density and Weed Cover are based on metrics which are both measurable and achievable.

Usage (habitat type and evidenced usage): Koala usage is described using multiple categories as defined under the Species Stocking Rate assessment method which includes 'No Habitat', 'Dispersal', 'Foraging' and 'Breeding' whereby foraging and breeding are considered identical by DCCEEW. The Mount Walker West (MWW) offset area is comprised of large areas of cleared paddock which contain very few habitat features for the koala and no evidence of usage, and as such is broadly considered to constitute dispersal habitat. It is generally accepted that areas containing foraging habitat values for the koala ranging from regrowth to woodland can be described as foraging and breeding habitat. Achievement of this will be demonstrated through the Modified Habitat Quality Assessment method implemented at baseline survey locations at Years 5, 10, 15 and 20.

Approximate density: This metric is calculated based on the Phillips and Callaghan (2011) Koala Activity Level classification. Under the method, a low koala activity is where usage of 0 to 22.5% is recorded, which means zero scats can still mean low density. No uplifts in density have been proposed on the basis that the density of koalas in a given area cannot be guaranteed, therefore the precautionary principle has been applied.

Weed cover: Weed management, which primarily relates to Weeds of National Significance such as Lantana, is an industry standard management measure used in all restoration projects. It underpins other habitat improvement management techniques such as planting. The proposed reduction target to <5% is in line with industry targets and the 5% threshold is a specific habitat quality parameter in 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.

A weed extent cover of <5% is considered highly achievable across each offset site and is measurable through a number of survey techniques including weed mapping and line-transect surveys, both of which have been used to establish baseline weed levels (refer PD Part A Attachment A14 – Section 3.5, Attachment A15 – Section 5 and Attachment A16 – Section 6.1.9).

Comment – Confidence in result

SHG and BAAM derived 108.35% direct offset for Koala assessment units by adopting the following confidence in result values:

- 75% for Esk 1 & 2, Avonvale 1, 2 & 4, MWW 1 & 2; and
- 85% for Esk 3 & 4, Avonvale 3, 5 & 6, MWW 3 & 4.

On information provided in the PD and OAMPs, there are equally plausible *confidence in result* values available for the Year 20 outcomes, e.g. 50% (*as likely as not*) and 65% (*as like as not/likely*). The direct offset derived using these values is set out below.

Submission 0080



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 OAMPs. 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 OAMPs ensure the offset area will be delivered in a manner that will provide suitable habitat for koala and GHFF.



3.8. Theme 8 – General Adequacy of Survey Effort

A total of 157 of submissions including templated submissions identify adequacy of survey effort for greater glider as an issue. It is noted these concerns have been addressed in Section 3.6. A total of 3 non-templated submissions were identified to include specific commentary on survey methodology used as part of the MNES presence surveys detailed in the PD. These submissions are provided below.

2019/8575 – Springview Village 2 & 3 contains a significant methodological flaw: **the complete omission of amphibian surveys**. This is not a minor oversight. Amphibians are a core component of Australian biodiversity and are internationally recognised as **sensitive indicators of environmental health**, particularly in relation to water quality, hydrological change, soil moisture, and ecosystem integrity. Woogaroo Forest contains **riparian corridors, creek lines, moist gullies, and wetland-adjacent habitat**, all of which are known to support diverse amphibian communities in the Ipswich and southeast Queensland region. Common species such as *Litoria caerulea* (Green Tree Frog), *Litoria peronii* (Peron's Tree Frog), and *Litoria dentata* (Bleating Tree Frog) are widespread in the region, and the Vulnerable *Adelotus brevis* (Tusked Frog) is documented in the broader landscape. The absence of any targeted amphibian surveys, nocturnal call-playback assessments, or seasonal sampling indicates that the proponent has **not met the basic expectations of a comprehensive fauna assessment** under the EPBC Act. By failing to assess amphibians entirely, the developer has not demonstrated that the proposed action will avoid or mitigate impacts on these species or the ecological processes they support. This omission undermines the credibility of the assessment and materially weakens the reliability of the proponent's conclusions regarding environmental impact.

Submission 1036 #1

- *Saunders Havill* are dismissive of existence endangered organisms in the area being evaluated, despite this plant being noted in the Woogaroo Forest Area. They have not completed or utilised new studies for vine forests or endangered plant species. 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.**

Submission 1036 #2

Reptiles:

Several vulnerable and regionally significant reptile species are known from the Ipswich and southeast Queensland bioregion and are likely to occur within Woogaroo Forest's remnant habitat. These include the **Collared Delma (*Delma torquata*)**, listed as Vulnerable in Queensland; the **Yakka Skink (*Egernia rugosa*)**, listed as Vulnerable under the EPBC Act; and the **Dunmall's Snake (*Furina dunmali*)**, also Vulnerable under the EPBC Act. The forest's intact leaf litter, fallen logs, mature eucalypts, and undisturbed soil layers provide precisely the microhabitats these species depend on, yet the proponent's reports do not acknowledge or assess any reptile species at all. By failing to survey or even mention reptiles, the proponent has not met the basic expectations of a comprehensive fauna assessment under the EPBC Act, nor have they demonstrated that impacts to this important faunal group have been avoided, minimised, or even considered.

Submission 1036



That the Queensland State Government has comprehensively mapped the vegetation in the area as core koala habitat is barely mentioned in the SH document. REs are referred to but not explained in relation to koalas, nor have they been used to estimate koala density (as used for example by Bussey and Ellis (2016) pp. 15-17, in the then only comprehensive study of Ipswich koalas).

It is also misleading. Two of the eight SH koala surveys were done during a drought year (2019) so should be rejected as outside the normal. All eight were conducted either in autumn or winter, presumably because this is more pleasant for survey staff. My experience - and all the koala experts I know tell me that - koalas are far more active in the breeding season. This starts around September here and continues well into summer. Why were surveys not done then? And why was the only method used the out-of-date Spot Assessment Technique? Why, at the very least, was acoustic monitoring not used? Survey methods using detector dogs were also well established at this time (see for example Woosnam 2015), and had even been used in the area by Ipswich City Council.

Submission 1308

With respect to the nominated rare and threatened plants; it is acknowledged many small plants will remain absent from surveys when their identification is reliant on the presence of flowers or a fruiting body. We would suggest the time committed to undertaking field surveys was insufficient to allow for a rigorous assessment of gullies and areas of lowland rainforest where small forbs would potentially be observed. Therefore to assert the nominated rare plants are not present cannot be accepted as fact.

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

Submission 0921

Response to Theme 8

Amphibian surveys

Submission 1036 states that the PD does not include detailed amphibian surveys, noting the potential presence of a number of frog species on or adjoining the site. The listed frog species raised by the submitter include *Litoria caerulea* (Green Tree frog), *Litoria peronii* (Peron's Tree Frog), *Litoria dentata* (Bleating Tree Frog) and *Adelotus brevis* (Tusked Frog).

It is noted these species are not listed under the EPBC Act therefore are not required to be assessed under the EPBC Act via Preliminary Documentation.

At the time of referral, the only EPBC Act listed amphibian species identified with potential to occur within the locality in the Protected Matters Search Tool results was *Mixophyes fleayi* (Fleay's Frog), listed as Endangered under the Act. A review of potential habitat was completed for this species which identified potential habitat values within adjoining gully line areas adjoining the referral area within Woogaroo Creek and Opossum Creek. Targeted surveys were conducted for this species as part of the referral material (refer PD Part B Section 2.2.1, 4.3.1) within the gully lines of Woogaroo Creek and Opossum Creek adjoining the referral site which included searches for potential suitable habitat and call-play back



techniques. Call play-back surveys were completed in March during the breeding season when breeding individuals are expected to be calling, however, it was acknowledged this occurred during a relatively dry period.

Fleay's Frog was not recorded as part of surveys. While there is acknowledgement that this does not demonstrate absence, it was determined that the potential for an impact or significant impact on the species was unlikely based on the lack of habitat features within the referral area such as semi-permanent to permanent water pooling (refer PD Part B Section 2.2.1 and Table 13). Potential habitat attributes were confirmed to be limited to riparian areas of Woogaroo Creek which are not proposed to be impacted and will be buffered through the retention of 27.5 ha of vegetation adjoining the gully line, therefore an impact is not anticipated, and as a result the species was not required to be addressed in further detail as part of the Preliminary Documentation.

Collared Delma surveys

Submission 1036 questioned the survey adequacy for threatened reptiles including the Collared Delma. As discussed in Section 3.2, the Yakka Skink and Dunmall's Snake were determined to have a low likelihood of occurring on site noting their broad vegetation community preferences and distribution do not align with the site. The Collared Delma, listed as Vulnerable under the EPBC Act, was considered as part of the broader likelihood of occurrence assessment undertaken as part of the referral.

Regarding the Collared Delma, the referral area has been subject to a combination of historical targeted surveys and contemporary searches to confirm the presence of habitat.

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 referral area in 2014 as part of assessments for EPBC 2014/7306 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. Extensive field surveys on-site and in the adjoining creek corridor have been undertaken across multiple years by experienced fauna ecologists which have included searches for terrestrial habitat features and microhabitat. In June 2026, additional surveys were carried out by experienced SH ecologists with the purpose of ground-truthing and describing habitat within the referral area. Microhabitat was actively searched for across the site with a particular focus on areas of sloping terrain which are a key component of the habitat for the species. Microhabitat attributes recorded 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. Targeted searches for the collared delma presence were not completed due to timing being outside the optimal window for surveying. Both the Cardno and Austecology reports are publicly available via the EPBC Act Public Portal.

Additionally, 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 referral 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.

For further details of the surveys completed, adequacy and findings, please refer to PD Part A Section 2.3.8 and Section 4.7.

Koala surveys

Submission 1308 states that surveys for koala activity and presence were inadequate due to timing of surveys and the types of surveys utilised. The submitter claim that only Spot Assessment Technique (SAT) surveys were utilised and that they were conducted at inappropriate times of year.

A range of survey techniques to detect koala and measure activity and abundance were utilised over a number of years. This included the SAT survey methodology (2019, 2020, 2023), spotlighting (2023), motion-triggered camera surveys (2023) and drone surveys (2024) (refer PD Part A Section 2.3.2).

Further detail has been added to PD Part A Section 2.3.2 to extract the findings of the drone survey report located at Attachment A3, in particular to show within the PD plans where the observed koalas are located relative to survey effort. The koala sightings recorded as part of the drone surveys are provided on PD Part A Plan A14. In addition, this plan has been updated to show the activity levels recorded via SAT surveys, extracted from Table A10, to better illustrate patterns of recorded abundance and activity within the site.

It is acknowledged the koalas have historically and currently utilise the referral area and surrounding areas of Woogaroo Creek and Opossum Creek. The result of the data collected over the several years of monitoring, which has been more clearly explained in Section 2.3.2, illustrates a preference for particular parts of the site and adjoining areas which is likely explained through variation in the composition of habitat and distribution of preferred foraging species.

Threatened plant surveys

Submission 0921 states that survey effort to detect threatened plants was insufficient. The EPBC Act listed species listed by submission 0921 include *Gossia gonoclada* (Angle-stemmed Myrtle) and *Coleus habrophyllus* (Shaggy-leaved Plectranthus). The submitter noted concerns particularly with regard to species which may occur within the rainforest and adjoining gully areas.



Both *Gossia gonoclada* and *Coleus habrophyllus* have been considered as part of the PD (refer PD Part A Section 2.1.1). Additionally, *Macadamia integrifolia* has been considered. Each species has a known presence within or adjoining the referral area. *Coleus habrophyllus* has been confirmed within a small rocky outcrop south-west of the referral area and *G. gonoclada* and *M. integrifolia* are known to occur within the rainforest areas within and adjoining the referral area, of which are notably to be retained. Lowland Rainforest of Subtropical Australia TEC areas have been mapped and assessed in detail by a Principal Ecologist with over 20 years in flora surveys any detection for threatened species has comprised a key component of these investigations. All threatened plants listed under the EPBC Act will be retained as part of the development through retention and buffering of areas where they occur.

Confidence in data

The following statement by submission 1036 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 (*i.e.*, 2019/2020), 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 continue to 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.*, detailed surveys in 2023 and 2024) to confirm that conditions remain consistent. Accordingly, the survey information is considered current and fit-for-purpose for assessing potential impacts to the MNES.

3.9. Theme 9 – Grey-headed Flying-fox Impact Assessment

A total of 61 templated submissions originating from three templates (Templates 13, 14 and 19) and two non-templated submission (1680 and 1684) for a total of 63 identify specific concerns with the assessment of grey-headed flying-fox.

This theme is considered different to *Theme 1 – Impacts to critical habitat* as submissions contain specific concerns regarding the assessment of grey-headed flying-fox habitat quality, population and landscape-scale factors, resource availability and disease. An extract from representative submissions are provided below.

3.3 Grey-headed Flying-fox (Vulnerable)

The Department notes proximity to a nationally significant camp and key foraging resources.

The proposed development area contains 161.4 ha of suitable foraging resources for the GHFF (MNES Management Plan – Ai, p29). Flowering eucalypts provide critical winter food shortages (Eby et al. 1999). Removal of large mature flowering trees disproportionately affects colony survival due to boom-bust nectar cycles.

Incremental loss of mature foraging habitat across landscapes is recognised as creating seasonal bottlenecks.

The proposal contributes to that cumulative risk.

Template 13/14 Extract



Disruption of Regional Foraging Networks: Grey-headed Flying-foxes operate within **regional foraging networks**, often travelling 20–50 km per night between roosts and feeding sites. The project area lies within the foraging radius of multiple known roosts in the Greater Brisbane region. The proponent has not undertaken any **landscape-scale nectar modelling**, despite this being essential for assessing impacts on a wide-ranging pollinator.

Clearing within these networks has cascading effects:

- Increased flight distances elevate **energetic expenditure**, reducing reproductive success.
- Loss of predictable foraging patches forces **resource switching**, which is associated with increased mortality during heat events.
- Fragmentation of nectar landscapes reduces the **resilience of the entire regional population**, not just individuals using the site

Template 19 Extract

Grey-Headed Flying Fox (vulnerable)

There is a Flying Fox camp nearby in Camira, along Sandy Creek, perhaps 2kms from this block. Grey-Headed Flying Fox use this camp regularly and Bat Rescue monitor this site. Regular heavy flowering of Gum-topped Box (*Eucalyptus moluccana*) across the district, such as 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. As the Woogaroo Forest has a wide mix of flowering species, there is a sequential burst of canopy flowering that covers most of the year. It covers most of winter and much of spring, these being critical times for GHFF.

Submission 1684

The Vulnerable Grey-headed Flying-fox (*Pteropus poliocephalus*) MNES

Status: Listed as **Vulnerable** under the *EPBC Act*.

Impact: These individuals, present mainly in splinter roosts near Addison Rd Camira and around Stephen Cook Memorial Park, Camira, rely on Woogaroo Forest as a reliable "stepping stone" habitat. The loss of this forest removes a critical foraging resource for a species already teetering on the edge of extinction.

Submission 1680



3. Public Health: The Land Clearing and ABLV Correlation

The link between habitat loss and **Australian Bat Lyssavirus (ABLV)** is now backed by clear research. Davis (2023), Davis (2024) Stafford (2026), Baranowski (2023)

Stress and Viral Shedding: Nutritional stress—caused directly by clearing bushland like Woogaroo—is a primary driver for increased viral shedding in bat populations. Stafford (2026), Baranowski (2023)

Exposure Spikes: Data shows a direct correlation between land clearing and the number of residents requiring post-exposure ABLV vaccinations. By clearing this forest, the Federal Government is effectively increasing the statistical likelihood of a resident or pet coming into contact with a stressed, shedding, or grounded bat. Davis (2023), Davis (2024)

There is an extensive body of knowledge comprised of academic and government research which recognises the high value of flying-foxes as providers of ecosystems services, and a well-established 'One Health' school of thought which articulates the interdependence of human and wildlife environmental health.

Submission 1680

Response to Theme 9

Templates 13/14 and 19 cite concern with the impact of grey-headed flying-fox foraging resources with regard to landscape-scale impacts and the extent to which these factors were considered within the PD. The impact assessment of the grey-headed flying-fox has reviewed landscape scale data (refer PD Part A Section 2.3.3) including:

- The location of potential foraging resources within a 20 km radius of the impact area.
- The location of confirmed public database records (Atlas of Living Australia) within a 20 km radius of the impact area.
- The presence of roosts (active and inactive) within a 40 km radius of the impact area utilising CSIRO Data Access Portal (McKeown and Vanderduys, 2024).

These data are used to describe the patterns of use on and around the site including the broad landscape scale, acknowledging the grey-headed flying-fox's ability to travel long distances.

It is acknowledged that the impact to 128 ha of foraging habitat for the development will have a significant impact on the grey-headed flying-fox including effects on life cycle through the removal of winter foraging resources (refer Section 2.1).

Habitat quality and impacts were quantified using the Grey-headed Flying-fox Foraging Habitat Assessment (GHFF FHA) Tool. This method includes a site condition assessment, site context assessment and species stocking rate assessment (refer PD Part A Section 4.1.2). The site condition assessment specifically considers the life cycle requirements of the grey-headed flying-fox and the disproportionate value of certain foraging species over others, citing the works of Eby and Law (2008). Six condition characteristics are assessed and scored, three of which specifically relate to the foraging species including timing of biological shortages, flower scores and quality of foraging habitat (where flower scores for species is $>0.65 \text{ wt p}^*r$). Site context considers several landscape-scale factors including presence of camps, presence of surrounding habitat, ecological corridors and patch size.



It is considered the PD provides a detailed review and assessment of relevant ecological factors at the site and landscape-level and are appropriate to quantify impacts on the grey-headed flying-fox.

Submission 1680 and 1684 refer to the presence of nearby roosting sites located in Camira and their relative importance to the foraging resources within the action site. With regards to the timing of flowering of foraging trees during seasonal bottlenecks, winter flowering tree surveys conducted within the action area indicated a generally low occurrence of flowering trees during winter surveys months, with flowering generally concentrated along waterways (i.e., O'Dwyer's Gully, Woogaroo Creek). Further detail regarding these surveys has been added to PD Part A Section 2.3.3 (b). Noting these patterns, the protection of creek line areas and the creation of corridors is anticipated to allow the persistence of a variety of foraging tree species and highly productive areas which are capable of producing foraging resources year-round.

A review of roost data sourced from the CSIRO Data Access Portal (McKeown and Vanderduys, 2024) was undertaken following general commentary received on the grey-headed flying-fox roosts (e.g. submission 1684). It is noted the grey-headed flying-fox roost identified as Camira – Stephen Cook Memorial Park roost which occurs approximately 1.5 km south-east of the site was identified as not appearing on Plan A16. A review of the CSIRO roost data indicated there was a location issue with the site. CSIRO monitoring data published in February 2026 includes the correct location information for the roosting site therefore has been included on Plan A16. It is noted this roost site is considered inactive under the CSIRO monitoring data; however, inactive or temporary roosting sites provide a picture of historical GHFF activity in the locality.

The roosting sites located in Camira being Stephen Cook Memorial Park (1269), Barbara Street (140) and Langley Road (1152) are considered inactive or temporary roosting sites and are located proximally to significant areas of foraging resources associated with the Greenbank Military Training grounds. In regards to the role of the action site as a stepping-stone habitat, corridors of habitat will be retained on all sides of the site which will retain functional productivity as foraging source for the GHFF as noted above. Additionally, the GHFF is known to use foraging trees in a variety of contexts including in backyards, parks, road reserves and linear corridors. These areas provide abundant stepping stone opportunities for GHFF within Greater Springfield (refer PD Plan A17 for a spatial view of potential foraging habitat).

Submission 1680 notes the potential for an increase in the exposure of Australian Bat Lyssavirus (ABLV) attributed to the proposed clearing impacts. An increased exposure to ABLV is typically observed where there is high human-flying fox interaction. As the submitter notes, one driver of this is where flying foxes are forced into urban areas in search of foraging resources where habitat has been cleared or fragmented. It is noted that the action site is described as an urban fragment and surrounded by urban areas. While it is acknowledged the action will reduce foraging resources for the GHFF, this will occur sequentially over a number of years in line with project staging, reducing the potential for ecological shock. Additionally, there remains substantial opportunities for foraging within Greater Springfield as detailed above including within creek line areas, open space parkland areas and contiguous foraging habitat located within the surrounding nature reserves (i.e., White Rock Conservation Park, Greenbank Military Training Area and White-Rock Spring Mountain Conservation Estate). Noting the above, the threat of an increased exposure to ABLV is considered to be mitigated.



3.10. Theme 10 – Indigenous and cultural value

A total of 5 submissions cited concerns around engagement with First Nations people and duty of care. Representative submission extracts are provided below. Submission 0865

4.2 Cultural Landscape Values

For First Nations peoples, Woogaroo Forest is part of **Country** — a living, interconnected system of cultural, spiritual, and ecological relationships.

Development risks:

- Destroying culturally significant sites
- Severing cultural connections to land
- Contravening principles of self-determination and cultural continuity

The government also has obligations under the **UN Declaration on the Rights of Indigenous Peoples** and national commitments to protect cultural heritage and support Indigenous-led land stewardship.

Submission 0865

7.4 Indigenous Stakeholders – This is the most disappointing aspect of the development. A 1-page map was developed in 1999 and nothing has happened on that front since. No extra surveys have been done. No special finds have hinted at a more complex story. No areas have been set aside for cultural heritage conservation. A brief survey through bushland – it was all bushland in 1999 – had apparently found everything relating to indigenous use of this land. This is totally unrealistic. A new sewer-line down Woogaroo Creek, about a decade ago, found evidence of camp sites and quarry sites. My adjacent property has numerous scar trees and artefact scatters. So, relying on a 1-page map made about 30 years ago, shows a complete lack of any Duty of Care.

Submission 1684

Violation of UNDRIP and Free, Prior, and Informed Consent (FPIC)

Australia's endorsement of the **United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)** creates a clear mandate for how development must proceed on our lands. Specifically ☐

Article 32(2): Requires the State to consult in good faith to obtain **Free, Prior, and Informed Consent (FPIC)** before approving projects affecting Indigenous lands and resources.

Article 26: Recognizes our right to the lands and resources we have traditionally owned or occupied.

Article 29: Affirms our right to the **conservation and protection of the environment** and the productive capacity of our lands ☐

By moving forward with an assessment that minimizes ecological and cultural impacts, the proponent is bypassing the necessity of genuine consent. As a First Nations person, I maintain that without the explicit consent of the Yuggera and Ugarapul traditional owners, this project constitutes a breach of international human rights standards and the spirit of the **Precautionary Principle** ☐

Submission 1041



Response to Theme 10

As part of the Springfield Open Space Master Plan, consultation was undertaken with indigenous stakeholders and cultural heritage experts. On 25th June 1999, a Cultural Heritage Conservation Plan (CHCP) for the Springfield Structure Plan was approved by the former State Government Environmental Protection Agency (EPA). The CHCP is provided in the PD Part A as Attachment A17.

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 identified in the CHCP as:

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

Under the CHCP there are three identified sites within the Springfield Residential Development, being Sites E, DD and EE. As per the Local Area Plan approval documentation (6243/2023/LAP, available at <https://developmenti.ipswich.qld.gov.au/>), all three sites have been deemed to be in the “adequately protected” category, remaining partly 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 Part A Section 7.4 to acknowledge the ‘duty of care’ obligation.



3.11. Theme 11 – Local Approval Process

Two (2) submissions were received which criticised the validity of the local approval process facilitated under the SSP including the Precinct Plan / Local Area Plan approval and Area Development Plan approval. A representative extract is provided below.

Counsel have reviewed the DA and identified four (4) prima facie errors of law in the Ipswich City Council's decision making process to grant an approval of the DA. This would provide the basis of an application to the Court could be sought. These are as follows:

1. The Council has applied the wrong assessment process.

- a. The Council's assessment report proceeds as if the Court Application is a code assessable development application under the *Planning Act 2016 (PA)*.
- b. At pages 5 & 6 of the Precinct Plan, there are several assessment benchmarks against which it was assessed and matters to which consideration was given.
- c. However, section 316(2) of the PA applies section 857 of the *Sustainable Planning Act 2009 (SPA)* for these types of applications, which in turn incorporates the provisions of the *Integrated Planning Act (IPA)* (sections 6.1.28 to 6.1.30).
- d. Those sections require applications to be processed under the IDAS process in the IPA and prescribe what they are to be assessed against (as well as calling up various parts of the repealed *Local Government (Planning and Environment) Act 1990*).

2. Pursuant to section 275W of the PA, the Council does not have power to approve the Precinct Plan.

275W Restrictions on approving plan applications

(1) *The local government may approve a plan application under the Springfield structure plan only if satisfied the premises to which the application relates—*

- (a) *are serviced by infrastructure provided under an infrastructure agreement applying to the premises; or*
- (b) *will, within a reasonable period, be serviced by infrastructure mentioned in paragraph (a); or*
- (c) *are serviced by interim infrastructure that is consistent with infrastructure to be provided under an infrastructure agreement applying to the premises; or*
- (d) *will, within a reasonable period, be serviced by interim infrastructure mentioned in paragraph (c).*

(2) *Subsection (3) applies in relation to a plan application for—*

- (a) *approval of a proposed precinct plan; or*
- (b) *approval to amend a precinct plan or the town centre concept plan.*

(3) *The local government may approve the plan application under the Springfield structure plan only if satisfied the proposed precinct plan or amendment is generally consistent with the land use concept master plan.*

...

(6) *In this section—*



land use concept master plan means the plan called the ‘Springfield Land Use Concept Master Plan’ in the Springfield structure plan.

There does not seem to be any statement of satisfaction in respect of any of these matters in the Council’s assessment report at all. Indeed, the only mention of infrastructure is that the Application exceeds the yield anticipated by the indicative phasing concept plan and the Springfield Infrastructure Agreement and proposes connection to external sewer to remedy this issue (see page 11 of the Precinct Plan). The land use concept master plan is not mentioned in the assessment at all.

3. The Precinct Plan is not consistent with the Springfield Structure Plan.

- a. Section 2.2.3.3 of the Springfield Structure Plan requires a precinct plan to be consistent with the “Land Use Concept Master Plan, Indicative Phasing Concept Plan, Open Space Master Plan and Drainage Master Plan.”
- b. As noted above, the assessment report does not address the land use concept master plan and is noted as being inconsistent with the indicative phasing concept plan (in terms of yield).
- c. In terms of open space, the assessment report notes that the open space to be provided is commensurate with the “quantum” of open space required by the structure plan but Figure 3 on page 7 of the Precinct Plan shows that it is not entirely consistent with the location of open space on the Open Space Master Plan. It is not entirely clear whether the precinct plan is consistent with the Drainage Master Plan (see page 10).

4. The Precinct Plan does not comply with the mandatory requirements of the Springfield Structure Plan.

Section 2.2.3.3(a)-(w) sets out several matters a Precinct Plan must either contain or address. It is not clear whether all these requirements have been met. A detailed review of the Precinct Plan will need to be undertaken to tick this off.

Submission 1082

Response to Theme 11

In response to 1082, the Precinct Plan (ICC ref: 6243/2023/LAP) dated 21st of March 2024 which is referenced and relied on in the Preliminary Documentation remains the Approved Local Government Plan for the project. No appeal has been made against this approval granted in March 2024. Subsequent Area Development Plans (ADP) for Village 2 (ICC ref: 4272/2020/ADP) dated 28th June 2024 and Village 3 (ICC ref: 5547/2020/ADP) dated 14th May 2025 remain the Approved Local Government Area Development Plans containing the area, design and conditions for which the project must comply. All Local Government Approval documents referenced in the Preliminary Documentation package remain lawful and valid.



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