

Dr Christina N. Zdenek

14 December 2025

To: Springfield City Group
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PO Box 4167, Springfield QLD 4300
CC: multiple MPs and politicians

To whom it may concern,

**REF: EPBC 2020/8651 “Scenic Precinct” – Controlled Action
Lot 51 SP242316 and Lot 50 SP242316 and Lot 1 RP863336
Springfield College Drive, Springfield, Ipswich, Queensland**

I refer to a proposal to clear 24.2 Ha of Koala habitat by Springfield City Group on Lot 51 SP242316. This was deemed to be a “controlled action” in 2020, with Assessment by Preliminary Documentation.

This referral should be rejected due to the unacceptable impact to EPBC-listed species (including the Endangered Koala), and other Matters of National Environmental Significance.

EPBC threatened species within the referral area

The Scenic Precinct project area occupies a total land area of 24.20 ha and the entirety of this ‘Woogaroo Forest’ area is considered to contain ‘critical habitat’ for the Shaggy-Leaved Plectranthus (*Coleus habrophyllus*), Angle-Stemmed Myrtle (*Gossia gonoclada*) (Endangered, EPBC; Critically Endangered, NCA), Koala (Endangered, EPBC), Grey-headed Flying-fox (Vulnerable, EPBC), Swift Parrot (Critically Endangered, EPBC) and Regent Honeyeater (Critically Endangered, EPBC). Clearing of EPBC-listed species’ habitat is ill-advised and squarely ‘unacceptable impact’, as doing so would render the species at a higher level of endangerment, regardless of offset attempts.

Regarding the **Swift Parrot**, the presence of eucalypt dominated vegetation communities in the referral area provides suitable foraging habitat for this species, particularly during winter flowering events. This species is nearly impossible to survey for outside of breeding areas during migration, however, they have been observed just 500m from the referral area, making it completely plausible that this species utilises the referral area. Indeed, an assessment of foraging habitat values for the Swift Parrot within the referral area identified the presence of preferred foraging species (*Corymbia citriodora* and *Eucalyptus tereticornis*) listed under the National Recovery Plan for the Swift Parrot. The proposal will result in the removal of preferred foraging species and as such, a significant residual impact is anticipated, likely pushing this Critically Endangered species toward further endangerment of extinction.

Regarding **Regent Honeyeater**, an assessment of foraging habitat values within the referral area identified the presence of preferred foraging species, including *Corymbia citriodora* and *Eucalyptus fibrosa*, that are listed under the National Recovery Plan for the Regent Honeyeater. The proposal will result in the removal of preferred foraging species and as such, a significant residual impact to this Critically Endangered species is anticipated.

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

Functional ecosystem supporting species of special concern

Furthermore, beyond the significant impacts to EPBC-listed species, the proposed project will result in the removal and loss of a functional ecosystem that supports the many other species of special importance such as Short-beaked Echidna, Frilled Lizard, Platypus, and the Powerful Owl (Vulnerable, NCA). Having an apex predator like Powerful Owls nesting and roosting in and around Woogaroo Forest is a strong indication of the high biodiversity and habitat values the area contains. The Powerful Owls in the area have attracted considerable public attention, garnering strong local and broader public interest in conserving them and their habitat.

Of particular interest regarding species of special concern is the Frilled Lizard (*Chlamydosaurus kingii*). This species has experienced severe declines in the southernmost portion of their range encompassing SE Qld. Colleagues and I are preparing a scientific paper for peer-review, which utilised 80 surveys combined with 15 years of Atlas of Living Australia database records, revealing a steep decline of Frilled Lizards in SE Qld, dropping 4.7-fold (470%) in just 15 years. Our findings, which account for overall changes in observations added to ALA over that time-period in SE Qld, illustrates that this species may meet the EPBC Criterion 2C1 (Critically Endangered: An observed, estimated, or projected continuing decline of at least 25% in 1 generation (15–20 years)). Our results highlight the urgent need for immediate habitat protection of this species, particularly in SE Qld. Of special interest, the last remaining population in the southern portion of its range exists in Woogaroo Forest, which contains the referral area. Indeed, a juvenile specimen was recorded in Feb. 2025 less than 1km (of continuous forest) from the referral

area, confirming a breeding population adjacent the referral area. It is therefore highly likely that the referral area provides habitat for this species, and this development will negatively affect this possibly critically endangered species.

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

30 by 30

The Federal Government has agreed to an international commitment under the Kunming-Montreal Global Biodiversity Framework—a global agreement to stem biodiversity loss—to protecting 30% of Australia’s land and sea by 2030. This 30% figure is based on decades of peer-reviewed scientific literature and proposed by experts as being a minimal figure to sustain ecosystems that sustain humans and our economy (>50% of which relies on a functional environment). Australia’s National Reserve System, as of 30 June 2024 covered around 22% of Australia’s land, falling 8% short of the 30% figure. The Ipswich City Council region has less than 21% of its land protected, making for the perfect case to purchase the Scenic Precinct and adjacent parcels making up Woogaroo Forest (which includes the referral area) to create a ‘gem of Ipswich.’ How to practically do this is explained in the subsequent section.

Nature laws and environmental offsets

New reforms to Australia’s nature laws in December 2025 include recognition of damage to critical habitat as an ‘unacceptable impact.’ Clearing (destroying) of habitat in Lot 50 SP242316 “Scenic Precinct” that supports all the aforementioned EPBC-listed species undoubtedly constitutes unacceptable impact. Not only will vegetation which supports threatened species be removed, but flooding conditions will be exacerbated by the presence of exposed earth, reducing water absorption into the soil, thereby increasing the volume of flood waters, plus increasing the speed of those waters. Such changed conditions will undoubtedly cause sedimentation build-up in deep pools in the creek (‘sand slugs’), removing the resilience of the creeks to a warming climate and extreme temperatures, plus cause erosion of creek banks that irreversibly damage both Woogaroo Creek and Opossum Creek, both of which support the declining Platypus, a species of special concern that has been shown to have concerning declines in the past 10 years in SEQ. In addition, once proposed homes are built, impervious surfaces will further increase the severity of flooding into Woogaroo Creek and Opossum Creek by increasing the speed and quantity of water during storms. The severity and frequency of super-cell storms in SEQ make land-clearing and development on slopes in this region, such as the referral area, particularly irresponsible.

The solution: The referral and surrounding land (Woogaroo Forest) could be purchased using financial offset accounts (currently sitting at ~\$100M in Qld unused) and utilised as a Key Biodiversity Area for threatened species habitat and for a sustainable birdwatching industry, carving out part of the \$2.6B birdwatching industry nationally annually. This new

parcel of protected estate could be included in the network of conserved areas, also called Other Effective Area-based Conservation Measures (OECMs).

The biodiversity financial-offset account is weakening in value with every year the money sits unused. Land prices are continually going up, resulting in a significant drop in purchasing power by that account. For example, prices of land have doubled in some places (e.g. western VIC) in the last 10 years. Indeed, offsets often fall short of their stated goal: to achieve at least no net loss of affected biodiversity (Maron et al, 2025). This referral area provides a perfect opportunity to uphold best practice principles through rigorous implementation of no net loss of affected biodiversity. Land clearing surrounding the referral area over the past 10 years renders this last remaining forest (Woogaroo Forest, 420ha, inclusive of the referral area) an exemplary use of the existing Qld financial offset account.

Cumulative impacts

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

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

Conclusion

Moreover, this proposed action is a controlled action that should be rejected due to the myriad, serious EPBC-related concerns above.

Yours sincerely,
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