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6th March 2026

Minister for the Environment and Water
Australian Government
PO Box 6022
CANBERRA ACT 2600

(epbc@springfieldresidential.com)

(cc – admin@savewoogarooforest.com.au)

Dear Minister,

**REF: EPBC 2019/8575 Springview Village 2 & 3 – Controlled Action
Lot 9999 SP292760 (162Ha)
7001 Mur Boulevard, Springfield, Ipswich, Queensland**

I refer to a proposal to clear **134 Ha** of Koala habitat by Cherish Enterprises on Lot 9999 SP292760. This was deemed to be a “controlled action” in April 2020, with Assessment by Preliminary Documentation.

This referral ought to be rejected due to unacceptable impacts on MNES.

Qualifications & Experience – ██████████

**Bachelor of Science, majoring in Materials Science, UQ, 1973.
Graduate Certificate in Environmental Management, CQU, 2003.
Graduate Diploma in Quality, QUT, 1985.**

I was an Environmental Officer with Scenic Rim Regional Council for 15 years, assessing properties for wildlife values and ecological restoration, which involves a detailed understanding of Regional Ecosystems of SEQ, State Matters of Environmental Significance, Nature Refuges, and Flora and Fauna Species in detail. I have been involved in numerous conservation initiatives in Ipswich over the last 40 years. I have a Land for Wildlife property in Bellbird Park, with a Corridor Conservation Agreement with Council, that backs onto Woogaroo Creek, and is virtually adjacent to Lot 9999.

Retired. I lead a Bushcare Group working on rainforest recovery on Woogaroo Creek, at the Council reserve at the end of Eugene Street, Bellbird Park.

Wrong Process for Assessment

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.

There is a high level of concern amongst residents of Ipswich about this development and the likely serious impacts on iconic species like Koala. People are expecting much more koala-friendly development. Two thousand (2,000) houses cannot be packed into a forested block with steep ridges and deep gullies without extensive concerns being raised. Surely, 134Ha cannot be totally cleared, without a single tree remaining, under an assessment process using only “preliminary documentation”. A more independent and objective analysis is required.

Objective Advice is Essential

The Department’s Request for Additional Information to the proponent in 2020, was keen to get **objective advice** (Item 1.5). However, this report is certainly not objective. It is biased heavily towards this particular proposal and towards unfettered development in Springfield generally. How dare the government, or community, expect any “best practice urban design” from developers operating in Springfield? I am very disappointed at the level of bias present. It reads more like **propaganda** than project analysis.

The Department needs to commission its own reports from independent experts to be sure of getting true “objective” advice.

Area of Clearing

This proposal hopes to clear **134Ha of critical Koala habitat**. An area of 7.6Ha was somehow claimed to have been approved for clearing under EPBC 2014/7306, an urban development now called “Kalina”. This was obviously approved in **error**, as the Kalina design has nothing to do with the Springview development, as can be readily seen. A thin strip of clearing within a wider retained Koala habitat could not be approved anyway as part of another development. They are two separate blocks with two separate owners doing two separate developments. This previous approval surely can’t be legal? Data submitted for this thin strip would clearly be out of date by now. This strip ought to be seen for what it is – just part of Lot 9999 – and needing approval as part of this project.

This proposal also suggests habitat clearing on Council blocks (lots 9004 and 9002, 9998, 9995, and 9996). Surely such a request cannot be considered. Council would need to make a separate application, no doubt, and submit separate mitigation reports. Council blocks were intended to be

clearing-free. They were zoned as “green space” under the Springfield Structure Plan (SSP). Actual development ought to avoid these Council areas with appropriate buffers.

This proposal also suggests clearing habitat on a neighbouring block – Lot 51 SP242316 – to the south. The recent proposal for Lot 51 – EPBC 2020/8651 – clearly stated that there was **No Road** through the development to the north and thus the purpose of this clearing is unknown. The design around the road in Lot 9999 needs to be questioned as to the amount of cut and fill proposed, especially the end near Lot 51.

So, the actual area wanting to be cleared, and able to be approved under this application, is rather vague. There are no detailed maps of this area and perhaps the area needs to be surveyed. An Erosion & Sediment Control Plan, specific to the clearing, needs to be assessed first and then any approval(s) would benefit from being **staged**.

It is such a large and complex area and with such irreplaceable habitat that the Precautionary Principle ought to rule out clearing altogether.

Context of Development on Lot 9999

This block is the last big vegetated block to be developed in Greater Springfield. It is zoned as “community residential” and “open space” under the Ipswich Planning Scheme, with a separate master plan called the Springfield Structure Plan (SSP). It was originally gazetted as a Development Control Plan (DCP) in 1997 under an old planning act. Newer acts have not seen fit to continue with this flawed planning instrument. Koalas in SEQ have now been declared “endangered” under State and Federal Legislation. Sadly, the State has given the developers of Springfield an exemption from recent Koala-specific initiatives designed to stop Koalas going extinct in SEQ. However, Federal legislation still applies. The Australian Government is the guardian of the Koala.

One would have thought that an urban development company would apply “best practice” design principles to every development they manage, and yet not one skerrick of “best practice” can be seen here. Even though federal requirements for reducing impacts on MNES would seem to require that “best practice” urban design be a mandatory code to follow, this proposal totally disregards such a clear policy.

There is no consideration for wildlife, and especially Koalas. There has been no obvious evidence of meeting any codes of the Ipswich Planning Scheme – nothing “sustainable” or “best practice” or “professional” at all. This proposal is certainly NOT an example of “Urban Best Practice” as suggested by McAlpine, et al, 2007.

There is nothing to hint at being “Nature Positive”. Sadly, even with a grab bag of Offsets, there is only nature negative.



Young Koala in Thick Canopy – Village 3

Department Requirements for Preliminary Documentation

The Department listed some requirements for the preliminary report that details the action likely to seriously impact MNES. A number of items seem to have been ignored.

2.1c – seems to have overlooked the vast amount of earthmoving planned for this development.

3.1 Potential MNES in neighbouring areas -? Collared Delma.

3.3 Likely MNES – such as Greater Glider and Collared Delma.

3.4 Age of relevant data – a date of 2015 was somehow deemed appropriate for relevance of survey data. Surely it is recent data that is needed – linked to the date of Assessment (2026) and not Application. Data from 2015 is all but useless.

3 The Koala needs to be assessed as a “vulnerable” species? It went “endangered” over 4 years ago. The department knows it is endangered and must act accordingly. There should be NO OFFSETs for endangered species, by definition. Just plain old mitigation.

3 A habitat score of 8 was suggested but a 7 still seems to be used.

4 A further 26Ha was identified as being impacted. No response? No mitigation anyway.

4 Residual Impacts on LRSA from likely mass slumping and soil erosion does not seem to be “offset”. There does not seem to be any mitigation measures to stop a wall of fill from slumping into the gully full of LRSA. A sports ground will be dug out of the mountain forming the banks of the gully leading into the LRSA. A wall of fill will be put across this gully with no further erosion and sediment control structures.

4.5 There will be no retained habitat (not even a single tree) in the clearing footprint. The **average** change to the natural surface will be **7 metres**. So every square metre will be modified by an average of 7 metres. There are 1,340,000 m² of clearing x 7 m / 2 (half cut, half fill) = 4,690,000 m³ of dirt (or 10 million tonnes) to move. This is an open-cut coal mine.

4.6 Cumulative Impacts seem to have been **ignored**.

7.1 Social costs – Note that Stockland has an option to buy the land. There are up to 50 stages to this design, with the very last stage being the sports field. After 20 years the community of 5,000 people will get some recreational open space. The local community will need to cope with substantial land clearing and earthmoving that will extend for two decades. Constant destruction of treasured environmental assets, including the whole shape of the landscape, will certainly have a negative impact on social health and cohesion. This loss of amenity will probably lead to a drop in value of many properties. As is obvious from the public documents, the **only** consideration for the design of this urban area is **profit**, far and above the constraints of the block. Of course, the downside will need to include a lot more federal investment in local recovery actions. The feds pay for developer profit.

7.2 Public Consultation – In spite of the statements in the PD, there has been no consultation on the nature of this project. It came as a complete surprise to learn that DAs had been lodged and that they planned the complete destruction of the central ridgeline that had been assumed to be something that could not be cut down. Council has codes that prevent this! The residents of adjacent suburbs are furious that this prospect could be allowed under the SSP. Clearly, we did not know that there were NO STANDARDS at all. Note that all these developments are “code assessable” and therefore the public have no say. The proponent certainly did ZERO public consultation.

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.

8.1 Ecologically Sustainable Development – see later.

EPBC Act Reform (Samuel Report)

The current reforms to the EPBC Act (Samuel Review and Reform Act) have created changes in wording and process, as well as having **clarified** many things to do with the current Act. Certainly, the outcomes for the Act were re-stated with an expectation of more “recovery” and “nature positive” in all things undertaken by the Department, including MNES assessments. Offsets were **always** an object of last resort, and will continue to be. There needs to be much more avoidance and mitigation of impacts if the current objects of the Act are to be realised.

The Nature Positive Plan, 2022, certainly defined a change in emphasis of the Department, and perhaps a return to the fundamentals that were already in the old act. All assessments need to reflect the objects of the EPBC Act in any case.

“A resilient and healthy environment is necessary for a vibrant economy and society and essential to quality of life.” Nature Positive Plan, 2022.

Ecologically Sustainable Development (ESD)

All development (every single activity) must make a contribution to the environment, otherwise we go backwards.

Section 3A (ESD) of the EPBC Act has been listed as a topic to address. As this is a generic aspiration, it is therefore prone to much gilding of the lily. But no amount of gilding can hide the motives behind this proposal.

This proposal does not contribute in any way to a healthy environment. Tipping Koalas over the edge of an extinction threshold is aggressively anti-ESD. It is a short-term view based on profits and likely to make Springfield a very unappealing mass of grey rooves. It will deprive future generations of a close association with an iconic Australian species. It will deprive current generations of a sense of place. This block has high biodiversity values and this will all be lost through the totally destructive design approach taken. MNES will lose critical habitat and this is a totally unnecessary outcome, as a “best practice” approach with consideration for the landscape and biodiversity would yield a more sustainable development.

Nature of this Development

The developer proposes to totally destroy the landscape of Lot 9999.

They propose a total reshaping of the landscape, of massive proportions, which will result in the total clearing of 134Ha of Koala vegetation. Three deep gullies will be filled and high ridgelines will

be cut. Steep land along Possum Creek, that simply can't be developed, is essentially all that will be left, except for one area that is basically "uneconomic" to develop.

Engineering reports submitted to Council for this development show that 15 metres will be cut off the whole central ridgeline and three deep gullies will be filled, with up to 15 metres of fill in some places. This will create housing blocks in areas that would normally be classed as "open space" and part of the drainage network. This is a low-yield block that basically should not be developed.

Past Clearing of Koala Habitat

There have been a number of blocks cleared for development in Springfield that have been referred to the Federal Government under EPBC Act. All had **high impact on Koalas**. Nevertheless, all were approved. All were offset for 100% of the impact. **There was absolutely NO AVOIDANCE and NO MITIGATION anywhere.** Many avenues for avoidance could have been taken but were not, for purely economic reasons. Many avenues for mitigation should have been taken, but were not. So Koalas are now absent from these areas. 341Ha of Koala habitat was cleared and not one Koala was recovered.

2013/7057 – Spring Mountain	255Ha cleared	No Avoidance	No Mitigation	100% OFFSET
2014/7306 – Village 1	40Ha cleared	No Avoidance	No Mitigation	100% OFFSET
2016/7676 – First Nine	46Ha cleared	No Avoidance	No Mitigation	100% OFFSET
2017/7875 – Woogaroo Hts	55Ha cleared	No Avoidance	No Mitigation	100% OFFSET

All applications, however, especially mentioned this **large nearby area** (i.e. Lot 9999) as being intact bushland and a place where Koalas would live, and thus it would be OK to cut down all the Koala trees on the relevant block and do no mitigation.

A block to the north of this application in Bellbird Park also pointed to this **large area of Koala habitat** across the creek, with the inference that this made it OK to cut down Koala trees there. EPBC 2013/7074 Brentwood.

So, Lot 9999 has been used as a **defacto reserve** for the past decade – a decade that saw the population of Koalas plummet. Thus, any clearing in Lot 9999 will negate past approvals of ZERO AVOIDANCE and ZERO MITIGATION as an acceptable premise. As these other blocks have all now been cleared, this block, Lot 9999, ought to remain fully vegetated.

Two current applications, in Springfield, to the Federal Government also note this **large area** of intact vegetation nearby (2020/8651 and 2020/8629). These areas basically adjoin Lot 9999 and therefore are part of this large area of Koala habitat. They should be conserved as well. These referrals would substantially be impacted by the outcomes of this referral. It is essential that this block remains intact.



View of Woogaroo Forest - Lot 9999 - from the North (looking South across Woogaroo Creek)

Woogaroo Forest

Lot 9999 forms a **central core** for forest remnants scattered across Bellbird Park, Goodna, Brookwater, Redbank Plains and even Collingwood Park. Woogaroo Creek forms a central spine and perhaps supports a refuge for Koalas during drier times. This forested area has been locally labelled as the "Woogaroo Forest". It supports a district colony of Koalas that move around to cope with seasonal fluctuations. To clear 134Ha in the middle of this wider forest is to destroy the viability of the Woogaroo Forest and the district colony of Koalas.

This clearing proposal is such a waste. It seeks the loss of an **irreplaceable** environmental asset. This area has been a forest throughout the Ice Ages (2.6 mya) and the Age of Megafauna – a refugia during tough times. There are old Broad-leaved Ironbarks (*Eucalyptus fibrosa*) certainly over 500 years old. There is a special Regional Ecosystem here – based on all these old Ironbarks (12.9/19.19). This particular portion was never intensively logged and has now had 40 years to regenerate. There are rare and threatened species here – MNES, MSES and MLES.

BAAM Report (Dec 2025)

BAAM was asked to back up the Developer's assertion that losing 134Ha of critical habitat would not be detrimental to the Koalas of eastern Ipswich. It certainly wasn't independent, as claimed. BAAM said the habitat loss (around 20% of the resources in the Home Range Study Area) – "will result in a reduced Koala population". BAAM did not quantify the increase in the level of risk of extinction so one can only assume that a VERY HIGH RISK (i.e. endangered) will be elevated to EXTREMELY HIGH RISK (i.e. critically endangered) for the local population.

Note that the notion of "primary" and "secondary" habitats is rather arbitrary in this instance. Most recent sightings were in fact in "secondary" habitats. So, this split is scientifically irrelevant and just a distraction. The reference to Figure 3 on page 14 ought to be **Figure 4**.

BAAM also said that "we consider a viable population will persist in the eastern Ipswich local government area". But only when the extra resources of the Greater Functional Connectivity Area were included (2,182Ha). By inference then, the population within the smaller Home Range Study Area would therefore **not** be viable. The concept of "viable" was also not defined. Such a population would become "critically endangered" and therefore likely to go extinct in the future.

Other experts, working in the local area on Koala recovery, have been recorded as being very concerned about the long-term prospects for Koalas here in the eastern suburbs – such as RSPCA, and University of Queensland, and Ipswich Koala Protection Society - ABC News item May 2025 by Liz Gwynn.

As the Department is primarily tasked with **Koala recovery**, the loss of any local population is not a "nature positive" outcome. The Koala is an "endangered" species, and the Department **knows** it is an endangered species, and must act accordingly. Abundant precaution is absolutely vital here.

Note that the Information Request/Comment (Nov 2024) was **not** copied into the Preliminary Documentation.

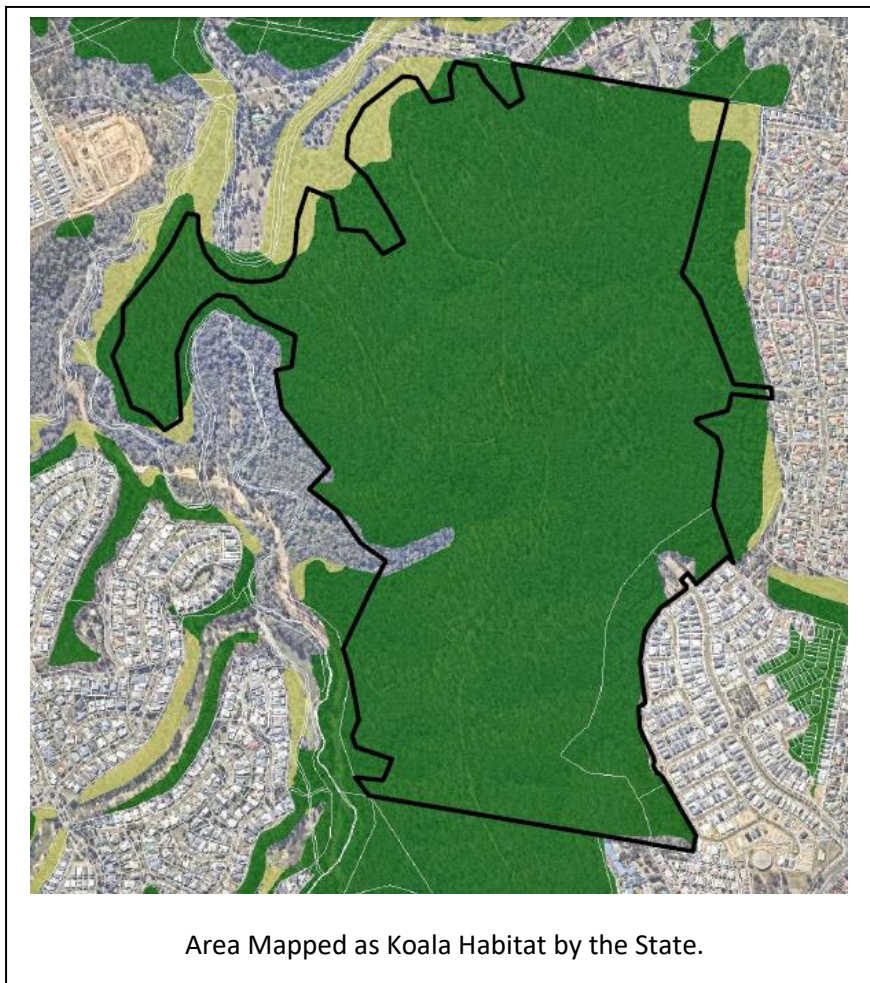
Developer Report (Preliminary Documentation)

The Report for this application notes that it was mapped by the State as Koala Habitat; that Koalas use the site; and that this was part of a district colony of Koalas. The clearing would have a **large impact on Koalas**, and by inference the district Koala colony. Grey-headed Flying Foxes likewise 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.

The notion of "sustainability" and a professional approach to urban development has gone missing. It is, after all, just plain old urban development that we are talking about here and this should be "sustainable" and to a suitable standard wherever it occurs. And the concept of sustainable development should be "front and centre". There is nothing special about the type of urban

development proposed here, needing extraordinary exemptions from State requirements. It is just a fantasy that Springfield would not need to be a “sustainable” community, just like every other community.

Developer’s environmental consultants go to great lengths to repeat that they never saw any Koalas on the block. In previous reports (MNES 2019), they covered “thousands” of kilometres, yet did not see one Koala – perhaps because it was mainly during winter. Rank amateurs go into the forest from time to time and usually see one, even in winter. It is a well-known feature of Koala monitoring that even trained observers will miss 3 out of 4 Koalas in a known Koala area (Bussey and Ellis, 2016). New techniques need to be used – such as dogs, and thermal drones at night. A “baited camera trap” was suggested as a method for Koalas. I wonder what they used for bait for koalas? Scats were found then, however, and this was proof positive that Koalas regularly used the area.



DA Processes with Council

DA 4272/2020/ADP – Village 2

DA 5547/2020/ADP – Village 3.

DA 6243/2023/LAP – Precinct Plan for Village 2 & 3.

Much detail can be found on intentions for development on this block. Many public documents can be seen that show the extent of the level of impact on the whole environment and MNES, much more than seems to be presented in Preliminary Documentation. There has only ever been one intention through this long tedious saga – cram in as many blocks as possible, whatever it takes.

A succession of environmental reports also gives a bleak picture of how far from best practice this proposal is. 23/9/2019 (MNES), 22/4/2020, 11/7/2020, 7/9/2023, 21/9/2023, 7/3/2024 and 26/7/2024. Still, the design did not change.

This was always a low yield block. But one day the owners wanted a high yield outcome from a low yield block. So, Koalas and wildlife never entered the equation. A high yield block would be a high-cost block. With such a high-cost block, a dense footprint is needed to make a profit. A purely financial decision.

- Nothing about creating a “sustainable” community.
- Nothing about meeting the aims of the Springfield Structure Plan (SSP).
- Nothing about meeting the similar aims of the Ipswich Planning Scheme (IPS).
- Nothing about “best practice” or a “professional” approach.
- Nothing about impacts on MNES.

The scale and intensity of development have not been altered from the very beginning. Nothing for the environment.

Block History

Cherish bought the block in 1992. Nothing happened until 2020 when two DAs were submitted to Council. Prior to this, Cherish had been involved in a DA that was not properly made, a number of court cases, losing the final appeal, and been forced to hand back a rates discount for supposedly keeping bees there. Stockland bought Village 1 in 2017 and developed it. They negotiated to have rights to buy Lot 9999 as well.

In 2023, it was deemed that Cherish needed to obtain a Precinct Plan approval before any Lot Reconfiguration could be approved. That was forthcoming in 2024, and DA Village 2 was approved in 2024, and DA Village 3 was approved in 2025.

In all that time, Cherish have had ample opportunity to design an urban space based on the landscape and biodiversity values of the block.

Springview Village 2 & 3 Design

The proposed designs for Village 2 and Village 3 show NO attempt to AVOID impacts on MNES at all. The steep, rugged landscape offers many opportunities to AVOID impacts. But 134Ha will be totally cleared and the landscape totally destroyed.

There has been NO attempt to MITIGATE impacts on MNES either. Once again, the steep, rugged terrain offers many opportunities to MITIGATE certain impacts. Instead, **Cherish have gone out of their way to increase the impact on MNES.**

‘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.

Much of this block would be “undevelopable” under normal town planning standards (and those standards that applied in 1997 when the DCP was originally approved). Ipswich City Council has a constraints layer on steepness and a code for retention of natural drainage features. Ipswich also has a code for limited Earthmoving and excessive use of retaining walls. Apparently, Ipswich chooses not to apply these codes. Otherwise, the proposed extent of clearing and earthmoving would **not be acceptable.**

Instead, this design depends on mass earthmoving of epic proportions – likely using mining equipment. Three deep gullies are going to be filled with up to 15m of fill. All the central ridgeline will be cut down by up to 15m. Every square millimetre will be modified. No block will reflect a natural land surface.

Other parts of Springfield, such as Springfield Lakes and Brookwater, have successfully retained gullies and vegetation and ridgelines. So, it can readily be done. This is basically the intention of the Springfield Structure Plan, as can be seen in the Aims in Section 1.3. This has proven adequate for MNES, as Swift Parrots and Regent Honeyeaters have been seen here before.

References – Arcadis, Village 2, Area Development Plan 25/5/2020 – DA 4272/2020/ADP
Arcadis, Village 3, Area Development Plan 9/7/2020 – DA 5547/2020/ADP

Wildest Block of Springfield

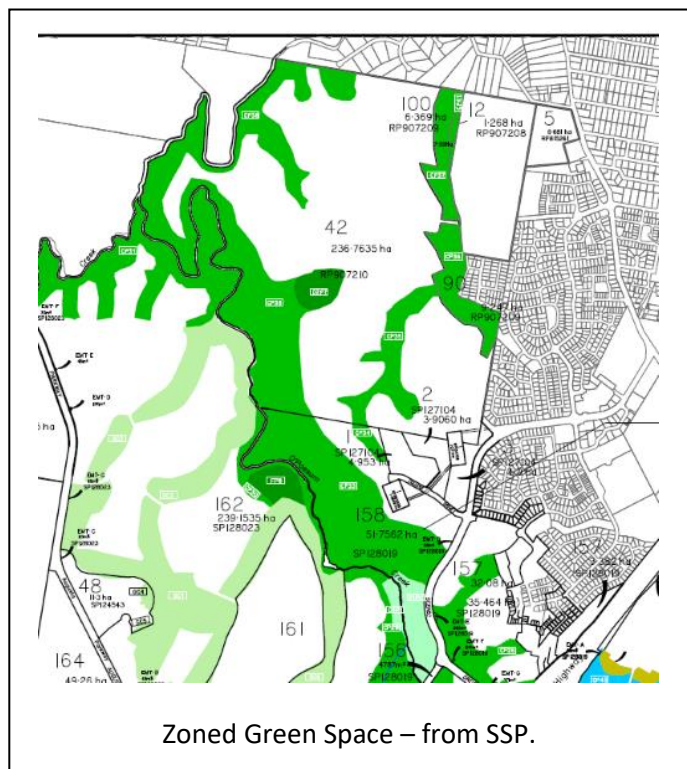
This block is the steepest and most rugged of all the blocks in Springfield. It has been left to the last to develop because it is so wild and therefore of low yield. It was, no doubt, purchased with low yield in mind.

This area is the further-most-from the Centre. Yet, the layout shows that this area will be, by far, the **densest area** in Springfield. This is clearly a “fail” against any Town Planning Standards. So, there has been ample opportunity for the Developer to apply a suitable and sustainable layout befitting the location of the block and the high environmental values. But no! Maximum gain at the expense of the environment!

A key aim of the Springfield Structure Plan is to create communities in “sympathy with the natural landform taking into account the protection, and where possible, enhancement of the natural environment” (Section 1.3 (h)). So, **this particular proposal does not even meet the aims of the Master Plan**. The “master plan” is being deliberately ignored.

Note that Urban Footprint is always subject to site constraints and performance codes. Thus, not all Urban Footprint areas end up as residential. The Urban Footprint is a broad brush. Green Space would certainly be set as a minimum and added to as more detailed analysis identified further constraints. Steepness is certainly a universal constraint.

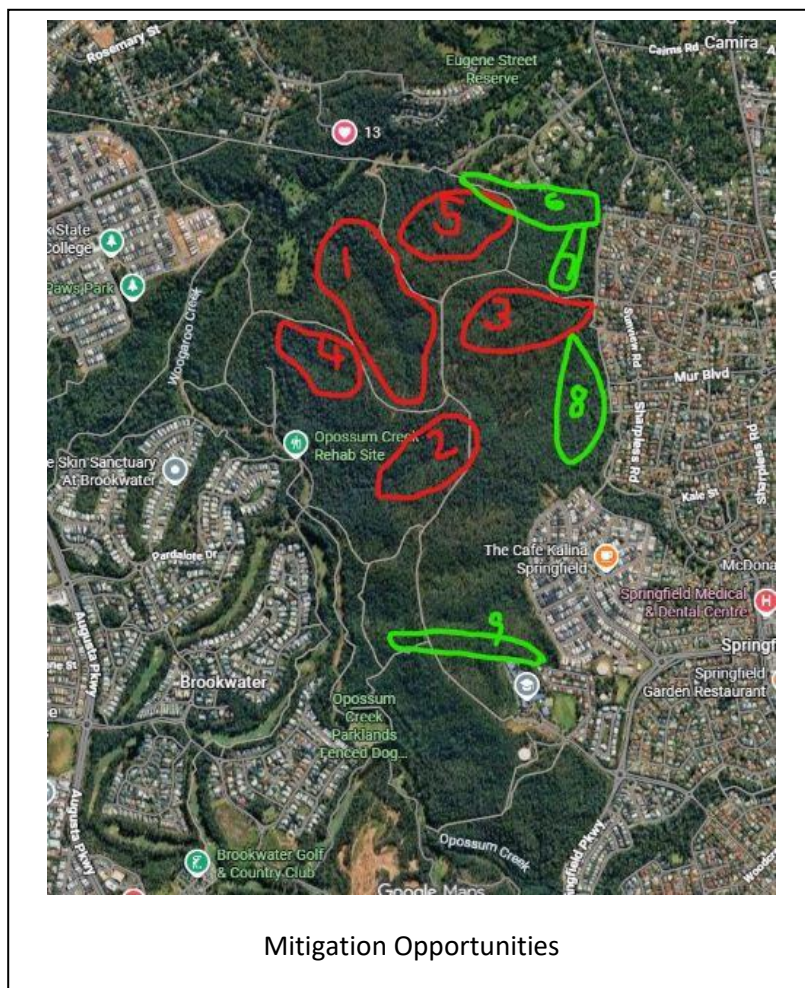
This referral ought to be **rejected**.



Opportunities for Impact Mitigation

Many opportunities could have been taken to make this design more Koala-friendly. The following is just a short list.

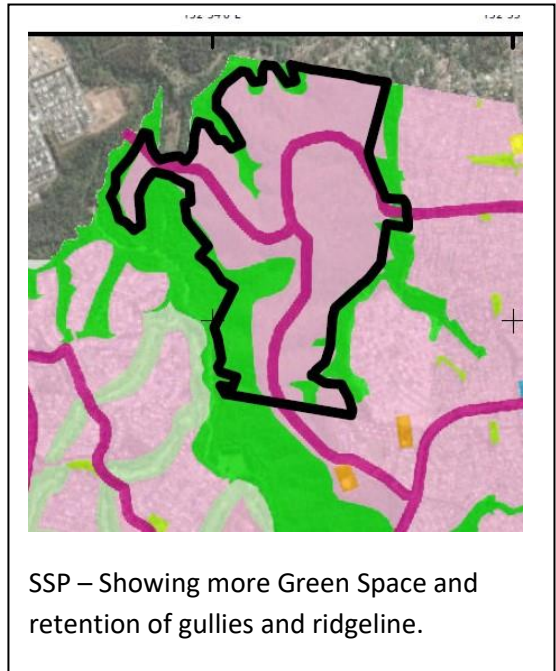
1. Retain deep gully (north). Most of it is zoned as “open space” and should be retained.
2. Retain deep gully (west). Zoned “open space”.
3. Retain deep gully (east).
4. Retain short gully full of Rainforest (LRSA).
5. Retain gully areas to the north.
6. Leave a buffer to the northern neighbours.
7. Leave a buffer along O’Dwyer’s Gully.
8. Leave a buffer along O’Dwyer’s Gully.
9. Leave a buffer to the southern neighbours.
10. Retain ridgelines.



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.

Mitigation and Urban Best Practice

Koala-friendly or Wildlife-friendly Urban Design has been accepted as a professional approach to creating sustainable communities into the future. It has been recognised as “best practice” or “standard practice” for many years now. McAlpine, et al (2007), “Planning Guidelines”, suggested a suite of practices for urban design in Koala areas. Garrard, et al (2017), “Biodiversity Sensitive Urban Design”, presented a framework for gaining biodiversity benefits. The Australian Government has issued a National Urban Policy. The Queensland Government has released the QDesign Manual and State Code 24 to define the standards for Urban Design. They also have State Code 25 specifically for Koalas, along with Guidelines. So, there is ample precedent for meeting a standard in Urban Design.

Following “best practice” would go a long way toward substantial mitigation of impacts from urban development. It would essentially be a basic requirement of all urban developments that impact on MNES. The aims of both the SSP and the IPS generally point to a best practice approach. So, it is very disappointing that this proposal does not meet even the basic beginnings of best practice. The Minister should not approve clearing of MNES habitat for a project that does not meet any urban development standards, nor contribute to nature positive.

Possum Creek Corridor

A corridor along Possum Creek has been touted by Cherish’s environmental consultants as a viable corridor for Koalas. It is stated that this is all they need -all 134Ha can be cleared without any impact on Koalas because they have this creek-line corridor. This is sheer fantasy. And in any case, this

corridor has been sadly compromised. A recent Trunk Sewer installation has sliced a 50m wide gash up the whole corridor. Half of the clearing was of Koala habitat trees such as Blue Gum and Grey Ironbark (and without EPBC referral?). There are no plans to rectify any of the damage. This corridor has been compromised for Koalas. This referral ought to be **rejected**.

National Initiatives to Conserve Koalas

It should be noted that the Federal Government is actively involved in the conservation of Koalas. There is a National Koala Recovery Plan along with a special team. This Plan involves coordination with the States.

The National Koala Monitoring Program is actively monitoring Koalas all around eastern Australia. Data from the Woogaroo Forest and other Ipswich locations are being collated on a national basis to assist in the recovery of Koalas.

The Great Eastern Ranges initiative includes outcomes to conserve Koalas by creating climate-change corridors. The Koalas of Woogaroo Forest may well benefit from these corridors.

This development proposal, with total clearing of 134Ha and NO MITIGATION, makes it harder to achieve any form of “recovery”. Koala numbers will need to increase before recovery can begin. High developer profits here look likely to cause a substantial increase in federal outlays to get back to nature neutral, let alone nature positive. This is a net economic loss.

Of course, the Queensland State Government has a number of initiatives to conserve Koalas. Sadly, they don't care about the likely extinction of Koalas in the Eastern Suburbs of Ipswich. This shows up a fundamental problem of intent. It seems that the Federal Government is the only body serious about recovering Koalas.



View of Woogaroo Forest - Lot 9999 – showing mature and extensive canopy

Thoughts of Local Experts

Dr Daryl Jones recently suggested that no Koala habitat in SEQ should be cleared at all, as the Koala is in such a parlous state.

Dr Frank Carrick, in 2013, over 10 years ago, suggested in his peer review associated with EPBC 2013/7057 that clearing there would have a significant impact on the local Koala colony.

Ipswich Koala Protection Society (IKPS) believes that Koalas are in real danger here of going extinct in the district. Taking out the largest piece of viable habitat will tip the district Koala colony over an extinction threshold. I believe QUT have done some modelling on this block that shows the very real extinction risk of this clearing.

Dr Hugh Possingham is against the level of destruction in this project.

Koala is “endangered”

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

Thankfully, the Department is now focussed on more Avoidance and Mitigation and much less “offset”.

Mature Canopy as a Vital Habitat Feature

A very important aspect of this forest is that it features a **mature canopy** of mixed eucalyptus trees. It therefore has resources and niches for many species and ecosystems. This aspect was not covered by the applicant. This mature canopy provides for MNES species such as Koala, Grey-headed Flying Fox, Greater Glider, Swift Parrot, Regent Honeyeater and Greater Glider. This mature canopy comes from trees that are of mature height. The block has been logged in the past and used for timber resources by a company called Burnie Board. It was selectively logged, with natural regrowth and coppicing occurring, and with one small area of plantation Gympie Messmate. All the ironbarks seem to have been left.

This forest is considered to be remnant and therefore of high ecological value. Old trees were left as a seed source. Older trees were supposedly left in the gullies. Regrowth trees have matured in the last 40 years since logging stopped. Retained trees have developed more habitat features and would be considered as old growth. There are certainly lots of hollows, as identified by the proponent. and surely many more not identified in such a large area. These resources are more than adequate for Greater Glider.



Mature Canopy with Abundant Resources

Age of Trees

A feature of the central ridgeline of Lot 9999, is the abundance of Broad-leaved Ironbark (*Eucalyptus fibrosa*). These trees are rather large as well. Using Ngugi, et al 2015: "Growth Rates of Eucalyptus Species", Journal of Forestry Research, Vol 26 No 4, growth rates for *E. fibrosa* can be estimated over their life spans, from Forestry data collected over 70 years. Ages of individual trees can be estimated from these growth rates. A tree that was recently illegally felled measured 80cms DBH. This equates to around **630 years old**. There are a number of trees that size. There are more trees around 70cms DBH that are 430 years old. Trees around 50cms DBH are around 240 years old.

Thus, this central ridgeline is certainly “Old Growth” and was a mature forest when Oxley rowed up the Brisbane River to the Woogaroo Creek junction in 1824, a mere 200 years ago. Certainly old enough for abundant hollows.

OFFSET Package

Offsets seem to be based on the logic of - *losses on one development can be balanced out by gains in another area*. This logic should not be applied to “endangered” species – as such species cannot cope with any losses, by definition. Endangered species are of VERY HIGH RISK of EXTINCTION. This means that every individual is essential to the population. Every genome is important. The Federal Custodian of Koalas (and other MNES) needs to be focussed on saving every individual.

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”.

I note that “offsets” have generally been discredited – with experts questioning their value – see Tran & Maron (2024) “Biodiversity offset conditions contributing to net loss of Koala habitat”. And the whole implementation of offsets has been fraught with non-achievement – see DCCEEW (2024) “Ground-truthing of EPBC Act Offsets”. So, the Department needs to focus on Avoidance and Mitigation as a primary impact reduction strategy. Only small residual impacts should be compensated.

The choice of offset location is purely an economic one. No offset close to the impact site would be considered as it is too expensive. Only those a long way from Brisbane are cheap enough. You can’t make a profit that way. Nothing to do with science or sustainability. Nothing to do with appropriate compensation for impacts on MNES. Just a single bottom line.

This Offset Package does not meet the **Principles** elaborated in the Offsets Policy.

1. Improvement: How can three bare cow paddocks scattered nearly 100kms away possibly maintain the viability of Koalas in the eastern suburbs of Ipswich? Koalas are still in decline. Past offsets have certainly not halted this decline. This offset package has very little chance of arresting this decline.
2. Statutory Protection: After this clearing, the Koala population in eastern suburbs of Ipswich may well be Critically Endangered. Offsets would need to be reflective of this likely

outcome. The size of offerings is nowhere near enough to maintain a stable population, let alone recover a population.

3. Proportionate to residual impacts: A residual impact of 100% is very hard to offset. 134Ha of remnant forest with a mature canopy requires a much bigger effort than this offer. The further away it is, the bigger it needs to get.
4. Risks of Failure: There are no demonstration blocks or scientific blocks to quantify establishment rates and growth rates and seasonal impacts. The actual risks of failure are therefore largely unknown. The outcomes are largely unknown. The 20-year targets are likewise unknown and are just a guess. Three separate offset areas would require three separate scientific blocks. An El-Nino event lasting a few years may easily prevent the start of any meaningful establishment of vegetation, which will cause a failure to meet 20-year milestones (that are essentially a guess anyway). There does not seem to be a Plan B – such as direct contribution of multi-millions to actual recovery costs.
5. Scientifically Robust: There does not seem to be any planned effort on surveys for MNES in the areas selected as an offset. How can any increase in the local population of Koala be measured? The whole basis of the offset is to have a net gain in Koalas to make up for the losses in Woogaroo Forest. Simply having Koalas using the new forest does not mean that the district population has recovered sufficiently. Surveying for Grey-headed Flying-fox would necessarily require many camps to be assessed. The whole Offset framework seems to be a failed theory anyway, without scientific basis.
6. Precautionary Principle: Offsets need to show an abundance of precaution. The small multiplication factor used shows very little precaution.

Other aspects of the Policy:

1. Close to Impact Site as Possible: These offsets are almost 100kms away. And two are not even in the same Local Government Area.
2. “Like for Like”: The offsets are not the same Regional Ecosystem. Only one is close. Geologies are different. The landscapes are different. Surely the landscape features, that support the Woogaroo Forest, need to be offset as well. Three deep gullies need to be offset.
3. Mt Walker West/Mt Mort property: Neighbouring properties are extensively eroded showing that the area is highly dispersive. The proponent would need to instal appropriate erosion control structures in the first instance to prevent erosion.
4. Habitat Features: The Woogaroo Forest exhibits lots of hollows, as it is comprised of big old Broad-leaved Ironbarks. Such a resource is a special outcome of complex Regional Ecosystems. These features need to be offset as well, as a part of creating additional forests for MNES. Koalas live in complex Regional Ecosystems. MNES depends on complex Regional Ecosystems. Bare paddocks have no capacity for hollow creation. Bare paddocks have no fallen timber. Bare paddocks have very little capacity to become mature ecosystems inside 100 years.
5. Koala DNA: Recent DNA studies have identified that Ipswich Koalas are different from Brisbane Valley Koalas (OWAD Report to Scenic Rim Regional Council 2025, and Lee et al 2009: “Genetic Variation ...”). So, offsetting Ipswich Koalas ought to be done in areas with similar DNA.

That a remnant forest of 134Ha, with a mature canopy and at least 40 years since selective logging ceased, can be offset by three big bare cow paddocks that will need to be planted and subject to seasonal variability to supposedly reach functional equivalence in a mere 20 years seems bizarre in the extreme. The Woogaroo Forest cannot be offset through this package.

As well as an offset, the proponent ought to contribute to the **actual costs** of MNES recovery in SEQ. Multi-millions of dollars are needed just for Koalas - Carers, Hospitals, a multitude of Road Crossings, Corridor enhancement, vaccines, scientific studies, etc. This is all because development is clearing too much habitat, and therefore ought to pay the full costs of recovery.

Other Relevant MNES Species

Greater Glider (endangered)

Greater Gliders used to be common and found around here. Incessant clearing in Springfield and nearby areas could easily push Greater Gliders into this area. A recent find west of Esk in Deongwar State Forest shows that GG can exist in logged, sub-optimal forests. They are found fairly close by in Spring Mountain and Greenbank Army land. It is **“highly likely”** that they are here too. There are unconfirmed reports of recent sightings.

As they are a silent species, much more survey effort is needed to actually claim they are NOT here. This scale of effort has not been done. Old Growth trees are here in abundance and full of hollows. Much effort was used to try to prove that Greater Gliders could not possibly get to the Cherish block from the nearest sightings. Yellow-bellied Gliders are there so perhaps there are many ways to move around including along Woogaroo Creek. Many tall Flooded Gums are found along this creek.

It was stated that the oldest trees were apparently left in the gullies. If this is true, then why are all the gullies being filled up? Cleared first and then filled. The oldest trees have the most hollows and may be habitat for the Greater Glider.

If they were here, and highly likely to still be here, and are nearby, then they ought to be considered in the Impact assessment. As no mitigation has been flagged then a separate offset is needed – one with thousands of large hollows.

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.

Any mature canopy of mixed species near this camp, such as Lot9999, would provide an extended nectar resource essential for GHFF. The loss of 134Ha would impact this camp, and GHFF, severely.

Swift Parrot and Regent Honeyeater (Critically Endangered)

Swift Parrots have been observed in the district from time to time. They are a nectar specialist that flies here to SEQ every winter from Tasmania. The loss of a mature canopy here must impact the ability of Swift Parrots to overwinter in this district, and therefore reduces the value of South East Queensland.

Regent Honeyeaters have also been seen at Springfield Lakes, travelling with Little Friarbirds, also a nectar specialist. Fewer flowering trees in the area would impact them and reduce their options.

***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.

Rufous Fantail (migratory)

Rufous Fantail is a species of creek-lines and wet gullies. It is found up and down Woogaroo Creek and Possum Creek. There seems to be a rough pattern of migration through SEQ at certain times. Filling up all the gullies, instead of leaving them as natural waterways, will have an impact on the district/regional population. It will limit their ability to move through the landscape, as they regularly do.

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.

White-throated Needletail (or Swift) – “vulnerable”

Flocks of this species move across the Woogaroo Creek valley on a reasonably common timetable. Generally, every Spring and Summer, flocks use the insect resources of the Woogaroo Forest for up to a day at a time. They fly low to the canopy over every portion of the forest. Taking out 120 Ha of forest canopy will decrease their available food resources. Thus, there is a possibility that they may not come this way in the future.

Lowland Rainforest of Subtropical Australia (Threatened Ecological Community) (endangered)

This threatened community occurs along Possum Creek and Woogaroo Creek, and up wet side gullies. It is a small remnant of the once extensive “Woogaroo Scrub” found all along Woogaroo Creek to the junction with the Brisbane River. Some large individual remnant rainforest trees can still be found along Woogaroo Creek. It has been known as “Gallery Rainforest” and mapped originally as 12.3.1 but now mapped as 12.3.16. This area was surveyed as part of a WWF Project in 1989 by Lloyd Bird and added to Forster, Bostock, Bird and Bean (1992): Vineforest Plant Atlas for SEQ. A remnant has been identified along Possum Creek and on the edge of this property. The remnant has received federal grants, about 30 years ago, to treat weeds and encourage natural regeneration.

Excavation of a so-called “regional” park out of the hillside, directly above the identified rainforest, and placing a wall of fill in a wet gully will affect this rainforest community. It also has the potential to overwhelm the forest in very wet years through massive land slippage, like what occurred recently near Bunnings. Erosion and Sediment Control measures to prevent any impact would need to be very comprehensive indeed. Such details are not forthcoming in the documentation provided. No indication is given that any such structures are contemplated. Only an ineffective buffer. Extra special arrangement ought to be installed during clearing and construction.

To preserve this unique vegetation community, **reject this application.**

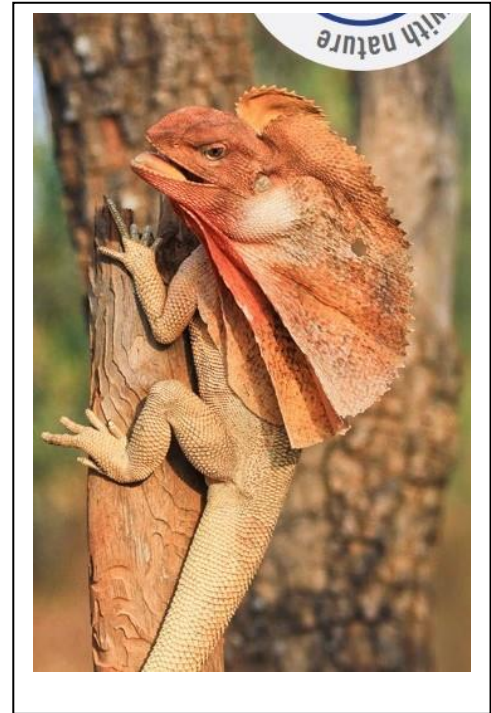
Other Species of Note

Rainbow Bee-eater (migratory) – was MNES

The Rainbow Bee-eater is a common element of this area. It is somewhat migratory but a few individuals seem to stay over Winter, more so in recent years. It is insectivorous and requires intact forest canopies to provide their food. The Woogaroo Forest provides that mature canopy, and the loss of 134 Ha would limit their ability to remain in this area.

Frilled Lizard (*Chlamydosaurus kingii*)

A special sighting in MNES Report 2019 was the Frilled Lizard (*Chlamydosaurus kingii*). They even included a photo! It is indeed a special sighting. These lizards are commonly found further north in the tropics. An iconic species with very large frill and cranky disposition, this lizard has made it onto the Strategy for Nature 2024-2030, a federal strategy and action plan. This population of the Frilled Lizard would be the southern-most in Australia, and under great threat through urbanisation. Other populations in Brisbane have been lost. The nearest group would be up near Gympie. They have been seen at Greenbank in the past by a select few specialists. This is certainly a great indicator of habitat complexity, and dispels the line of the proponent that this is just a logged-out coupe of low biodiversity. Such an exciting find! Yet nothing was said about it in any report.



Special Conditions for Clearing

This area should NOT be cleared!

However, should clearing be approved, there ought to be **special conditions** attached to clearing. 134Ha is such a vast amount of wood. It should **NOT be chipped**, as this represents a loss to the environment.

Hollows need to be recovered and reused, as they are essential for many MNES and MSES. There ought to be thousands of hollows. Logs with root balls can be used for erosion repair projects along rivers and ought to be delivered to special depots. Logs also need to be put in the nominated Offset areas as the offset package shows bare paddocks with no fallen logs after decades of intensive grazing. These offsets are unlikely to reach any sort of complexity without enrichment from fallen timber. There are many vegetation rehab projects in the Ipswich Council area – including Council land and other offset areas. These too need fallen timber.

Community Opposition

This proposal has galvanised surrounding suburbs into fierce opposition to the extent of development and clearing and landscape reshaping. All residents want Koalas to continue to be part of their suburb. All residents gain a greater sense of home through retention of a forested ridgeline and adequate resources for Koala. All the residents of Ipswich want Koalas to continue to be part of the city. There are no benefits at all for the environment and society from this development. The whole concept of “sustainable” development will be violated by this particular proposal.

“We are passing to future generations a legacy of decades of unsustainable plunder, compounded by the impacts of a rapidly changing climate.” Dr Ken Henry, National Press Club, 16/7/2025.

Reject This Referral

When are we going to start being “sustainable”? When are we going to live with our wildlife? Why do we make it an “either/or” as far as Koalas (and much of our endemic wildlife) are concerned? Why do we allow short-term profit motives for a few to dictate long-term sustainability outcomes for the rest of us (along with long-term cost increases)?

There is no attempt to follow “best practice” guidelines.

Let’s keep it fully vegetated. This referral ought to be **rejected**.

Yours sincerely,

██████████

(Attachment)

Attachment



Looking north from Kalina showing links with forests in Bellbird Park and Goodna.



Wider view looking north with Springfield College (Primary) in foreground.