Minister for the Environment and Water Australian Government

PO Box 6022 CANBERRA ACT 2600

Dear Minister,

REF: EPBC 2019/8575

Springview Village 2 & 3 Lot 9999 SP292760 Springfield, Ipswich, Queensland

I refer to a proposal to clear 130 Hectares of Koala habitat by Stockland/Cherish Enterprises being Lot 9999 SP 292760. This was deemed to be a "controlled action" in April 2020. This referral ought to be rejected.

[redacted]

[redacted]

North Ipswich 4305

Qualifications – Bachelor Applied Science Chemistry

Context

This block along with 3 other proposed developments (Belleview Woods, Scenic Precinct 2020/8651 and Peninsula Precinct 2020/8629) make up the last remaining undeveloped part of what was once a very large dry Eucalypt forest. (See figure 1). This forest is almost entirely located within the "Springfield Development Structure Plan" area. When approving these developments, Ipswich City Council (ICC) could not use the codes in the Qld Government "Nature Conservation Act". This act was amended to exclude it's use when developments lying within "Development Structure Plans" are involved.

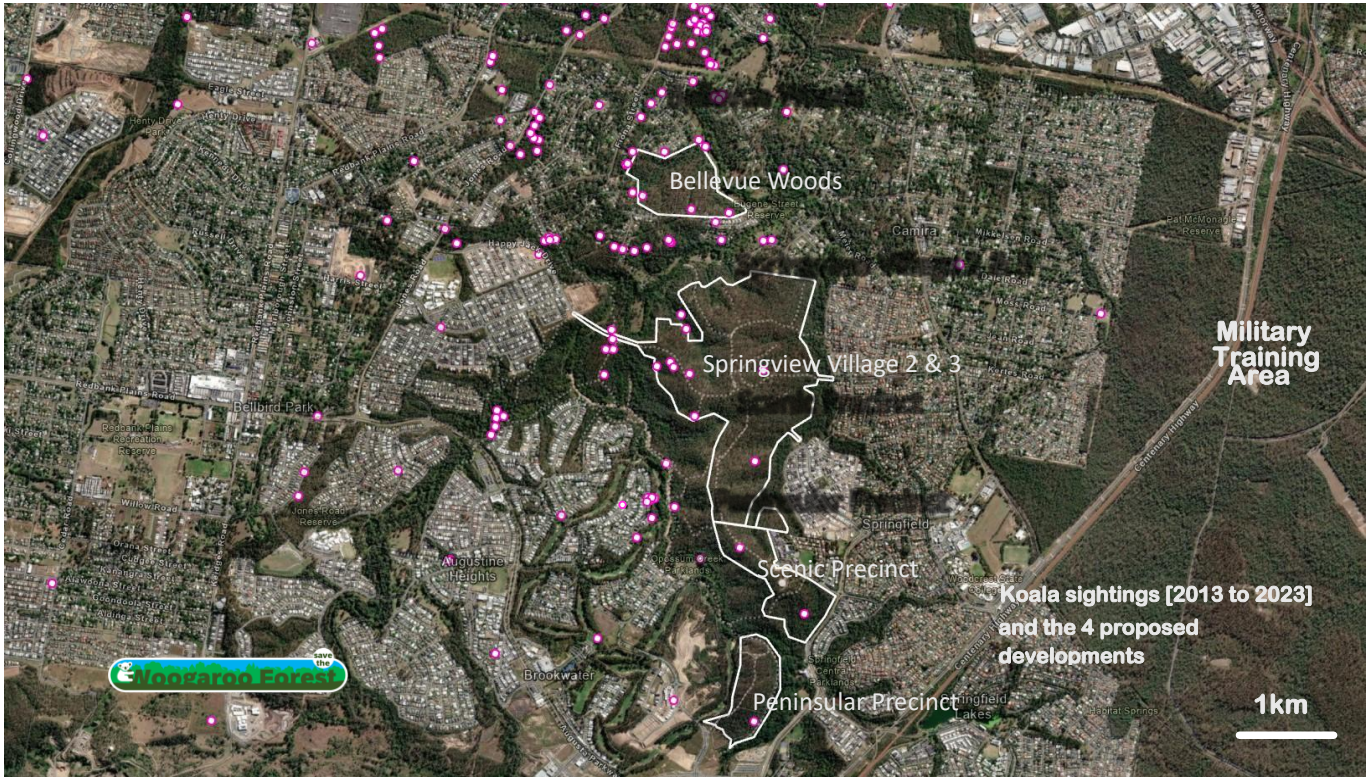
It is the "Springview Development Structure Plan" that is the assessment tool ICC had to use to assess this development. The "Springview Development Structure Plan" was legislated in 1997 during the Borbidge National Party Government. It was written in response to SE Queensland's first large scale master planned development. It contains near zero environmental requirements and what exists is very vague. It is written such that approval conditions are negotiated, rather than set by ICC.

The 450 hectares of forest in which the 4 proposed developments sit is now known as Woogaroo Forest by the local community as well as many other people further away. These 4 proposed developments need to be assessed together. The flora and fauna living in the forest do not know of or respond to the boundaries of the developments. Fauna moves freely across these boundaries. Every hectare of forest removed decreases the ongoing viability of the forest to be a habitat for the vulnerable and endangered native flora and fauna that presently live here.

Logging ceased in the 1980's and even then, it was only selectively logged, leaving many untouched mature trees deemed not suitable or too difficult to log. Consequently, this allowed Woogaroo forest to quickly recover and it is now a working mature forest containing many endangered and vulnerable species. (including Koalas, Grey-Headed Flying Foxes, Swift Parrots, Regent Honeyeaters as well as migratory animals such as Rufous Fantail, Black-faced Monarch, Spectacled Monarch, Rainbow Bee-eater, and White-throated Needletail)

Please note this submission will be focussed on the fate of koalas that would result from this development and the 3 other proposed developments listed above. There will be only minor reference to the effect on flora and other fauna. I will leave a more detailed study of these to other submissions.

Figure 1



What I hope to Demonstrate

I hope to demonstrate that the ecological report in the application to EPBC is seriously flawed with respect to koala numbers living in Woogaroo forest and surrounding suburbs, as well as the impact of the development would have on existing and future koala populations in and around the referral site.

I also hope to demonstrate that the proposed off set is woefully inadequate to compensate for the loss of habitat that would result from the proposed development.

Demonstrating the inaccuracies of Saunders and Havill Groups ecological reports and conclusions.

Reading the 2020 ecological reports prepared by Saunders and Havill Group for Springview 2&3 proposed development (submitted to ICC) I note that for the 3 fields surveys, only 3 sites in total were recorded as having koala scats and there were no actual koala sightings. Saunders and Havill Group thus concluded that there is very little use of any of the forest as koala habitat. This is despite there being many sightings by the public in and around the forest including in this proposed development area as recorded in I naturalist. (See map 1) Also see appendix 1 where members of the "Save Woogaroo Forest Group" have created their own data base of recent sightings by members which includes photographic evidence with geolocation co-ordinates.

In the 2020 Springview 2&3 ecological report it makes reference to I naturalist as an unreliable data base and instead quotes 2 state government data bases. One of which is only used to record koala rescues, and the other few people use.

I also note that the ecological report for these developments records koalas as being vulnerable. **Koalas since February 2022 have been declared endangered** and as such EPBS legislation has much stricter requirements for developments that are koala habitats. Saunders and Havill Group's ecological report that was last updated October 2025 still has koalas listed as vulnerable. Saunders and Havill Group have not taken the fact that koalas are an endangered species into consideration in their report.

Saunder and Havill Group's vegetation assessment for this proposed development (and the 2 other developments for which they have written ecological reports) lists a wide variety of species of koala trees present in the forest. Koala sightings as presented on map 1 and in Appendix 1are more in number in the surrounding areas than deeper in the forest because it is only recently that a few people have been entering the forest. More people looking more often on the fringes of the forest. If koalas are regularly seen in the fringes of the forest and in the surrounding suburbs where threats are higher than in the forest, it is a creditable assumption that there would be koalas in at least similar numbers in the forest with these koalas moving

between the forest and the surrounding suburbs. Koalas generally forage for food in a 1-to-2-kilometre radius (males much larger in the mating season) making the forest vital for the koalas regularly seen in the surround suburbs.

Saunders and Havill Group's various koala surveys have yielded very widely differing numbers. Surveys in 2020 for all 3 of the reproposed developments reported no visual sightings of koalas with only a few scats observed. In the most recent ecological report in 2025 it gives a density of 0.2 koalas/hectare based on the 2 koala sightings by drone.

"In preferred habitat female koalas have a home range of approximately 1 hectare, whereas males have approximately 1 to 1.5 hectares, depending on their age and size. These home ranges can overlap, for example, a male koala's home range may overlap with the ranges of other males and females". *From a SA Dept Environment and Natural Resources fact sheet called Koala Life Up Close and Personal.

To say that the recording of 2 koalas in a drone survey means there are only 2 koalas in the area at the time is false. While drone surveys are much better than SAT, surveys the drone surveys are still only accurate to 65% ->85% depending on how many surveys are performed. ***Endeavour Veterinary Ecology reported in 2022*** only 65 % to 85% accuracy using missed detection of koalas with radio tags. Drone surveys still miss koalas as a result of many factors including multiple canopy layers, koalas on the ground and missed coverage as a result of drone operator not being able to keep line of sight of the drone. (a legal civil aviation requirement for the operation of a drone)

I would also like to comment on a map in the Saunders and Havill Groups ecological report showing the location of koala rescues in around Woogaroo forest as supplied by the RSPCA. No dates of the rescues are provided. Given the location of the rescues are concentrated in the recently developed areas I strongly suspect that these rescues are historical and associated with the land clearing for these recent developments. This further strengthens the argument that land clearing kills koalas and developers cannot be trusted to implement effective fauna management plans when clearing land.

Importance of Ipswich Koala genetics

For reasons explained below Ipswich Koala genetics are critical to the future survival of koalas in SE Queensland. To understand this, it is necessary to explain some background to koala interactions and reliance on the species of eucalypt they eat.

Eucalypt tree leaves contain toxins that only koalas are able to tolerate. In normal times koalas can get all their nutrition and water from the leaves. However, in times of drought the eucalypt trees respond by reducing their water content and increasing their concentration of toxins. This results in dehydration if an alternate water source is not found and starvation because koalas are unable to tolerate the higher concentration of toxins.
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Koalas are hind gut fermenters and inherit their stomach flora from their mother before they even leave the pouch adding to the complex and diverse needs of koalas. Koala stomach flora is specific to the species of trees on which the koalas feed. Koalas relocated from one area to another are likely to starve unless the eucalypt species in the source forest is the same as in the receiving forest. This is one of the reasons why many attempts to relocate has resulted in very low survival rates. There are many mitigating circumstances to be considered when decisions are made to relocate koalas. This is not in their best interest.

Ipswich koalas are well known in koala circles as having a much larger range of eucalypt species in their diet. Some of these species are more drought tolerant than others. Drought tolerant species include *Eucalyptus crebra* (narrow leaved ironbark) and *Corymbia tessellaris (*carbeen*,* moreton bay ash*)* to name just two of the local species found in and around Ipswich koala populations.

Other koala subpopulations in SEQ are unable to digest these more drought tolerant species of eucalypts as they lack the necessary stomach flora to digest and sustain viability. Given climate change and the likely higher frequency and severity of drought conditions, Ipswich koala genes are vital if koalas are to survive in SE Qld, now and into the future.

Further Ipswich koalas are also known for their genetic diversity compared to other subgroups in SE Queensland. Recent research has shown that some of the Ipswich population have a "genetic switch" that allows them to suppress the koala retrovirus (KoRV), which causes immune suppression and makes them susceptible to chlamydia. These resilient animals are crucial for breeding programs and potential repopulation efforts in areas with decimated numbers. This could help explain why the koalas shown in appendix 1 appear disease free.

As Dr Bill Ellis and Joanne Bussey (***University of Queensland***) state in their 2016 report under the section headed

"The Koalas of Ipswich Opportunities and Threats"

"Ipswich LGA includes areas identified as Koala Conservation Areas, Koala Sustainability Areas and Urban Koala Areas. The Koala Plan recognises Koala Conservation Areas and Koala Sustainability Areas as the most critical to the continued existence and sustainability of viable koala populations in the wild."
They further state: "As koala populations in the rest of Queensland are predicted to further decline in the face of climate variability (Seabrook et al. 2013) the Ipswich LGA is seen as a potential climate refuge for koalas: an area where they may persist despite such changes.
For this to occur, the habitat and threats need to be managed ensuring koalas living there today are sustained now and into the future."

Disease Impacts

Chlamydia is a naturally occurring bacteria endemic in SE Queensland koalas. Not unlike the cold sore virus in humans, it is only when a koala is under stress that it manifests itself in clinical symptoms. The same goes with pneumonia type diseases in koalas. Deforesting causing the koalas to flee for their lives into unsuitable habitat is certain to cause stress and result in koala diseases, infertility and most likely a slow and painful death.

A study led by Dr Michaela Blyton of the University of Queensland showed a clear relationship between stress and increased disease risk in koalas in SE Queensland and on the New South Wales North Coast.

Less than ethical behaviours of the proponents of the development

I also wish to point out what I believe to be less than ethical behaviors and actions by some of the proponents of this development. Please find following a summary of the events where I believe this has occurred.

1- In September 2023 a meeting between the Ipswich Koala Protection Society (IKPS) and the proponents of the Springview stage 2&3 development was requested by IKPS with the Stockland development team through the local state member of parliament, Mrs Charis Mullen. Attending the meeting were 4 representatives of IKPS , a representative of Stockland and 2 representatives from the Saunders Havill Group. At this meeting IKPS was told that whilst all development approvals were being worked through, they were basically all in place and nothing can be done to stop the proposed development. IKPS later found out that this was not true. At this time ICC had not even approved the Springfield Development Structure Plan and Stockland had not even provided the requested information back to EPBC following their initial approval application. When questioned by IKPS as to whether a night drone survey was performed, the representative from the Saunders and Havill Group replied that the technology was not reliable. (remember this for further down)

2- Subsequent to this meeting in the official response to over 200 stakeholder's submissions to ICC, the Saunders and Havill Groups insinuated that IKPS was in some way supportive of the development. Nothing could be further from the truth.

3- While making enquiries to fund a drone survey of the forest, Save Woogaroo Forst Group (SWFG) became aware that a series of thermal drone surveys had been performed by an ecological assessment consulting firms on behalf of the property owners/developers between 2017 and 2020. These surveys confirmed a wide distribution of koalas within and immediately surrounding the proposed development areas. However, despite this being documented and reported by the consulting firms, this valuable sighting data appears to have been excluded from the ecological assessments submitted to ICC and original reports to EPBC, with these reports instead stating no Koalas were sighted in the forest during their numerous surveys.

4- In the revised ecological report for the Scenic Precinct development dated October 2025 (about 1/5th the size of the Springview 2&3 development) Saunders and Havill Group reported that there were 4 koala sightings, 2 visually and 2 by drone.(these drone surveys performed in 2023) Saunders and Havill Group claim without explanation that these 4 sightings were the same koala. From this they extrapolated that

there is only 1 or at the most 2 koalas in the subject area. In the same report there were 4 cane toad sightings which on Saunders and Havill Groups logic means there are only 4 cane toads in the subject area.

5- A new sewage trunk main was constructed in 2022 /23 to service the proposed developments. This trunk main follows the Opossum creek line with 5 crossings across Opossum Ck. My understanding is that Springfield City Group commissioned the construction by contractors. The land where the sewer was constructed has since been donated to ICC. This construction has left a trail of destruction 40 to 50 meters wide and 3km long and subsequent severe erosion into Opossum Ck as well as weed infestation into the bare ground (see photos Appendix 2). When contacted by both concerned residents and the local media all entities involved either did not respond or blamed another party.

   On contacting Queensland Urban Utilities (QUU) in August 2024, I was informed that QUU was well aware of the issues and had visited the site on several occasions and had requested that Springfield City Group propose a rehabilitation plan. (the erosion had exposed much of the sewer infrastructure) This plan had been submitted but rejected by QUU who wrote back with required changes. (this is over 1 year after the completion of the sewer main construction)

   Without QUU's intervention there would not have been a revegetation plan for the scared landscape. Erosion into Opossum Ck and the spread of weeds would have continued uncontrolled.
   At the time of the writing of this submission the jury is still out as to the success or not of the revegetation plan, which was only started mid-2025, 3 years after the construction of the trunk sewer.

6- I question the quality of and the motivation for the Saunder and Havill Groups field surveys. A few untrained residents were able to enter the fringes of the forest and gather undeniable evidence of a significant koala population in all 3 proposed development areas. However, the Saunders and Havill Groups original field surveys made no sightings of koalas in any of the 3 development areas and only reported a few scats . From this the Saunders and Havill Group ecological report providing concluded that any koalas in the development zones were few in number and only transitory. Mysteriously in surveys performed in September 2023, 4 sightings were made just in the Peninsula Precinct subject area. (2 were via night drone and 1 via a SAT survey and 1 via spotlighting). Saunders and Havill Group reported these sightings without evidence as being the same koala.

An Alternate View on the Existing Occurrence and Fate of Koalas as a result of this Development

Saunders and Havill Group have presented ecological reports showing huge differences in Koala counts. Zero sightings for the 3 proposed developments for which they have written ecological reports (reported in 2020). In 2025 they report 2 drone sightings and 2 visual sightings in the Scenic Precinct area (about 1/6 of the total area of the 3 develolpments) which they said was the same koala. Further they are assuming that the 2 drone sightings recorded in 2025 in the Peninsula Precinct area are the only koalas in the area. In their koala counts they do not take into consideration the drone count method is at best 65% to 85% accurate or the overlapping of home territories of Koalas. Consequently, their counts are vastly underestimated and their genetic importance to the long term survival of koala in SE Qld is completely ignored.

On the evidence of the photos in Appendix 1 the koala population is significant and appears to be healthy. Interestingly, there are no koala joeys visible in the photos. This suggests that the female koalas are raising their young deeper in the forest as it is a safer place. If so, this supports the importance of keeping the entire forest.

If these proposed developments are approved koalas will become locally extinct in a short period of time with many koalas dying a long and painful death by chlamydia, road kill or starvation.

Comments on Saunders and Havill groups proposed mitigation measures

From reading the Sauders and Havill Groups documents under mitigation measures I understand that the actual mitigation management plans for this proposed development have not been written. What the supplied document provides is what should be in the plan. These suggestions include directional felling in the direction of fauna escape. The use of fauna spotters and fauna catcher.

It would be very naive to think that even if a plan was documented it would be carried out successfully. I find it very hard to believe that a registered spotter selected by the proponents of this development would scour the area in front of the bulldozer, carefully examining the trees for wildlife and stopping the work should an animal be spotted and wait 24 to 72 hours before coming back to remove that tree. Likewise, it very hard to believe that a catcher selected by the proponents of the development would hold up the clearing while they tried to catch an *animal clinging to a tree*.

On the evidence of what happened with the clearing of the forest for the upgraded sewer (performed by Springfield City Group) discussed earlier, I have near zero confidence that an effective management plans for fauna, flora and erosion control will be implemented

Also note there will be no long-term safe harbor for the fauna surviving the land clearing as all the forest is proposed to be cleared and levelled with up to 14 meters taken off the ridges to be used to fill in up to 14 meters in the valleys. (see Appendix 4) There will only be small theoretical corridors which do not connect safe habitats as there will be no safe habitats if all the proposed developers are approved. These claimed corridors have already been compromised by the sewer construction land clearing mentioned above. There will be further compromise of the corridor with the construction of the proposed retention basin and other stormwater drainage infrastructure.

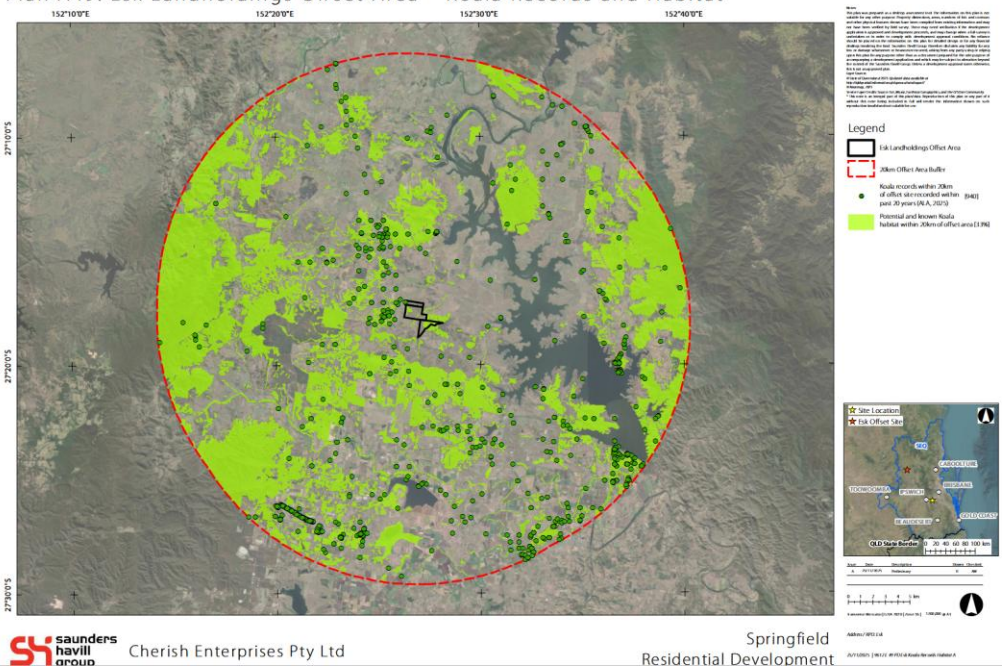
Comments on Saunders and Havill Groups proposed offset proposal

I note with much scepticism the use of ratings for various environmental attributes to give an overall score for suitibility as a koala habitat for the three proposed off set sites. The three Koala Records and Habitat plans as presented in the application (Plans A49, A57, A66 see below) for each of the off set sites show that there are no recorded koala sightings or sightings in the immediate ajoining areas with existing potential connection to the off set sites. The sightings that are recorded outside the off set areas are up to 20 kilometers away and the date of the sightings up to 20 years old.

Below the 3 Habitat Plans I have inserted Map 1with the recent sightings of koalas by local residents in and immediately round the referral area. Please note these sightings are from March 2022 to July 2024 making the oldest less than 4 years old. In this period there were 67 recorded sightings with photos for each sighting. See Appendix 1 for these photos which includes the date and location coordinates for most of the photos.

Despite the above the proponents of the development would have us believe that the habitat quality in the 3 proposed off set sites are equal to or greater than the habitat quality presently in Woogaroo forest. **This is obviously not the case.**

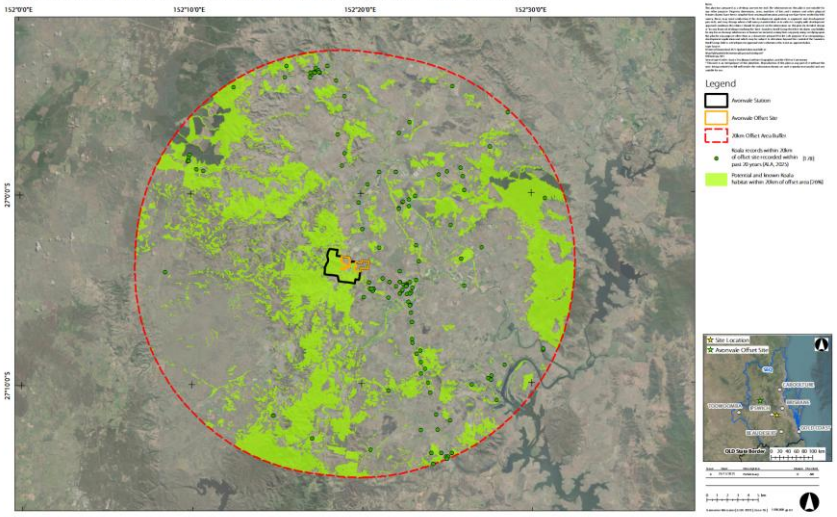
Plan A49. Esk Landholdings Offset Area – Koala Records and Habitat



saunders havill group Cherish Enterprises Pty Ltd

Springfield Residential Development

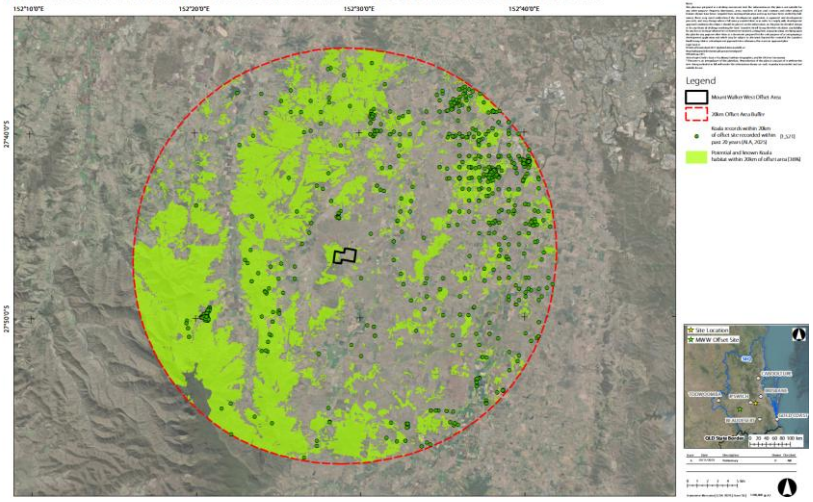
Plan A57. Avonvale Offset Area – Koala Records and Habitat



saunders havill group Cherish Enterprises Pty Ltd

Springfield Residential Development

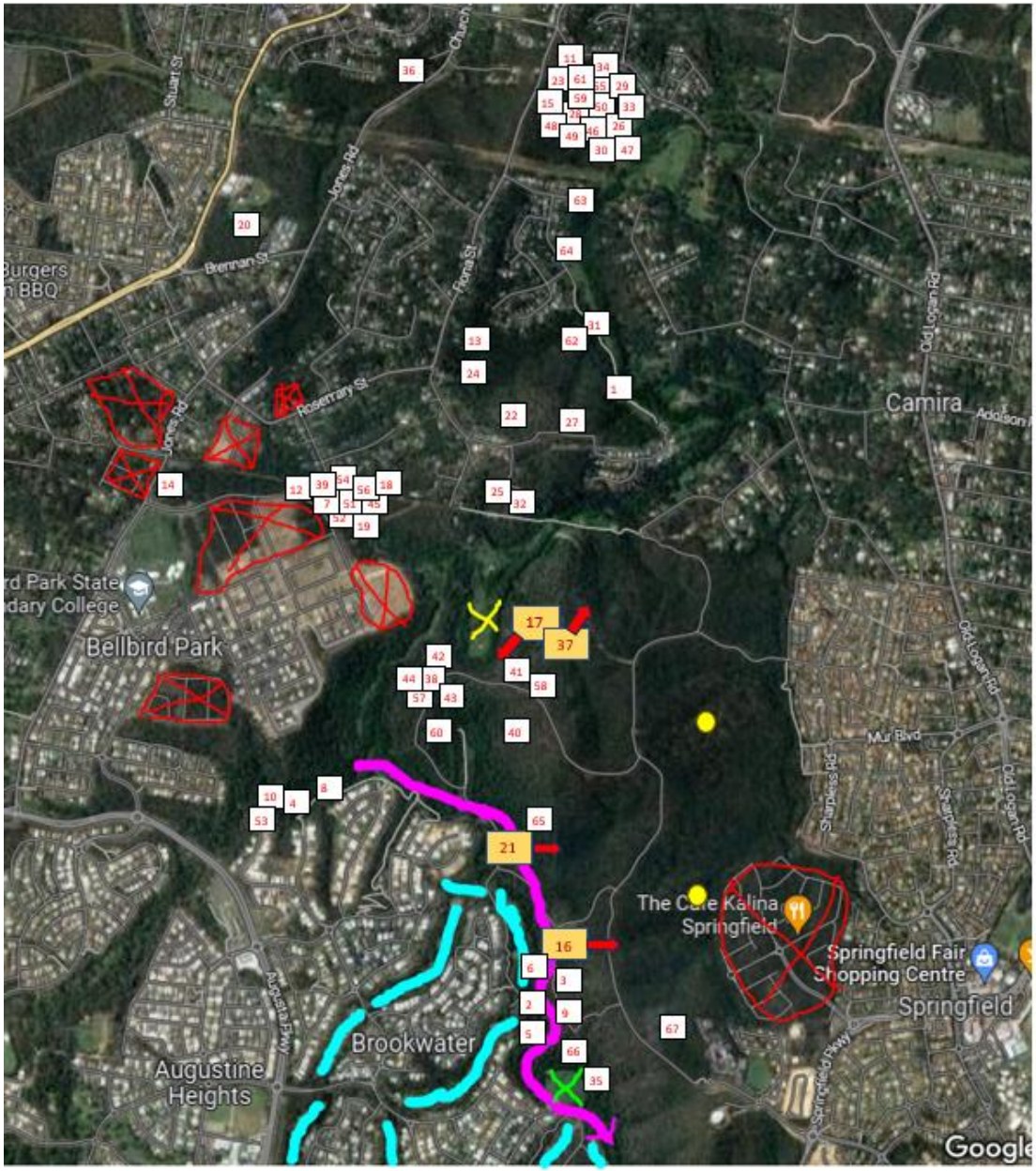
Plan A66. Mount Walker West Offset Area – Koala Records and Habitat



saunders havill group Cherish Enterprises Pty Ltd

Springfield Residential Development

Map 1 – Koala sights by local residents between March 2022 and July 2024



Comparison of tree cover

The photos in Appendix 3 shows a comparison of the 3 proposed offset areas present tree coverage (taken from the environmental report submitted to EPBC) to the existing tree coverage of Woogaroo Forest. The photos clearly demonstrate that the 3 proposed off set sites are not presently capable of supporting a viable koala population. The ecological report mentions revegetation plans but I could not locate any detailed plans. There appears to be no commitment that grazing would be removed from the off set areas.

Given the above, even with a rapid and extensive revegetation program (that would need to be managed and policed into the future) there will not be suitable habitat for koalas for over 10 years and even then, many planets would need to align. Where would the koalas to populate the off set sites come from? Are there still koala populations in the areas indicated on the habitat plans above? Will the land between where any koalas are now and the off set areas have guaranteed connections for the next 15 years?

Public support for saving Woogaroo Forest.

At the time of writing of this submission there were over 20,000 signatures on a petition to the minister to reject the proposed developments. (see link below)

https://www.change.org/p/murray-watt-save-the-koalas-of-woogaroo-forest-ipswich-queensland-australia

I would also like to point out that there are longstanding local organizations whose sole focus is Woogaroo Forest. These include

a. The Woogaroo Ck Bushcare group
b. The Springfield Lakes Nature Care group
c. The Bell Bird Park Preservation Group
d. The Save Woogaroo Forest Group (formed 3 years ago to try to stop the proposed developments)

Conclusion

The whole basis for the Saunders and Havill Groups argument with respect to Koalas is that they understate the size and the importance of the existing koala population in Woogaroo forest, resulting in a conclusion that there is no significant impact on koalas. At the same time they are overstating the benefits of a very dubious offset proposal. The Saunders and Havill Groups ecological assessments treat koalas as vulnerable when as of 2022 they have become endangered. The undeniable evidence in this submission of a significant healthy koala population in and around the forest destroys this

argument. Therefore, all requirements under the EPBC Act for endangered species and their habitat need to be applied in the assessment of the 4 proposed developments.

Likewise for other endangered and vulnerable flora and fauna Saunders and Havill Groups ecological reports have denied or downplayed their presence. Other submissions will also prove the inaccuracy of these reports and therefore require a much stricter assessment.

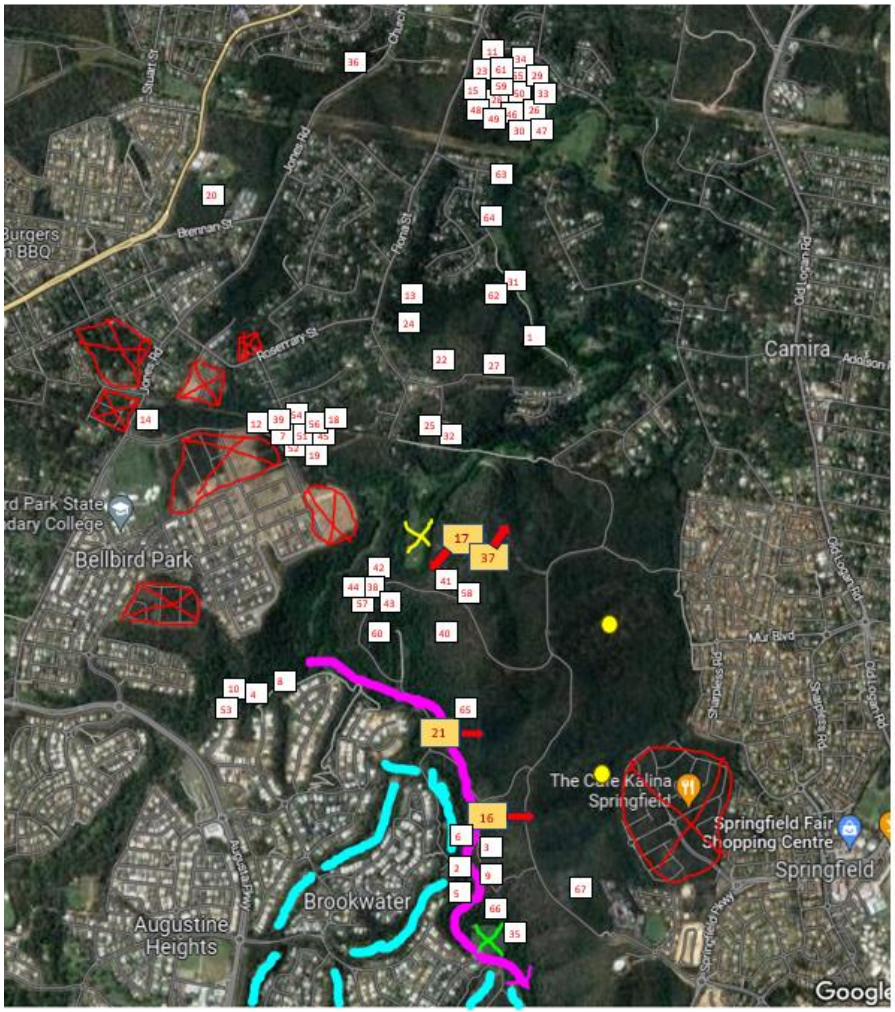
The proposed offset proposal in effect replaces a working mature forest which is a proven habitat for several vulnerable and endangered species with a near fauna habitat desert. For this area to become a viable habitat many planets need to align and given the history of the success of offsets is unlikely to occur.

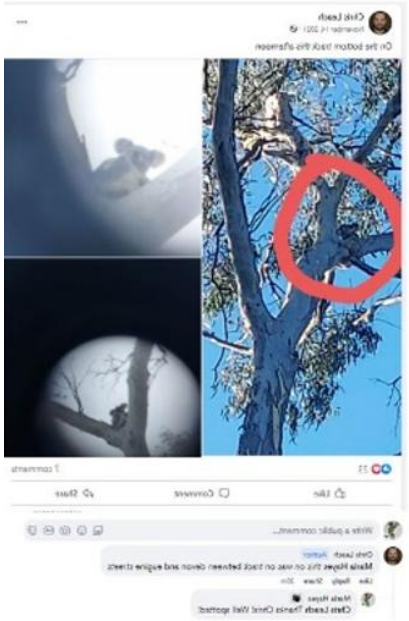
Every hectare of land removed from Woogaroo forest decreases the medium-to-long term viability of the population of the vulnerable and endangered species now living in Woogaroo forest.

I therefore call on the minister to reject this application. (EPBC 2019/8575)

Appendix 1

Map showing recent koala sightings by local residents with following photographic evidence, many of which have geolocation coordinates.





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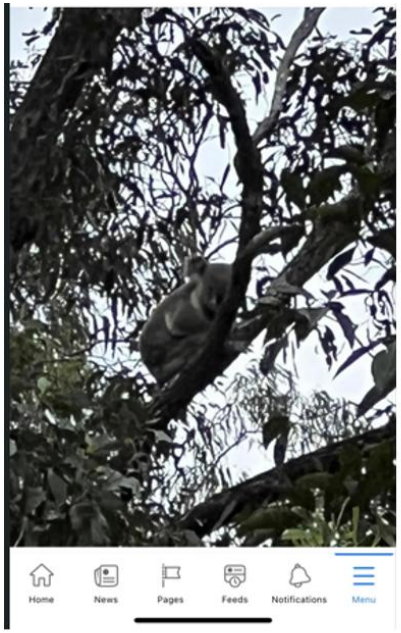

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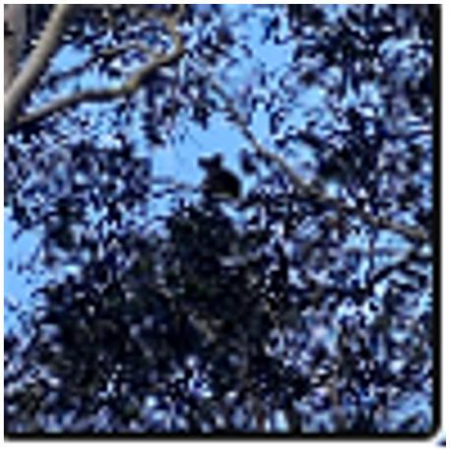

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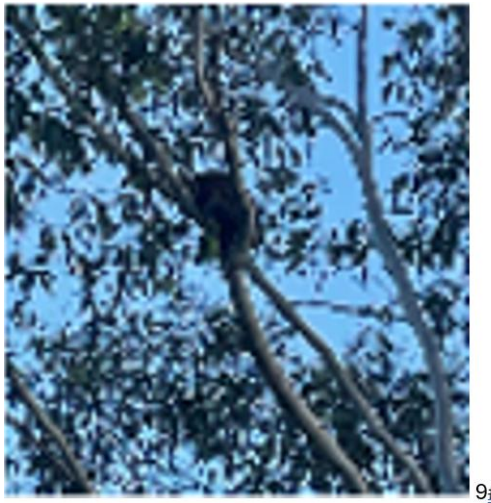
#6 14/10/22

7# 1/12/22



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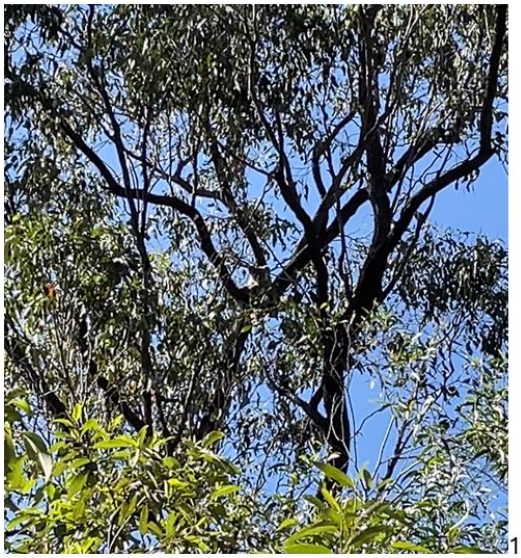

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13# 17/12/22

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15#28/01/24

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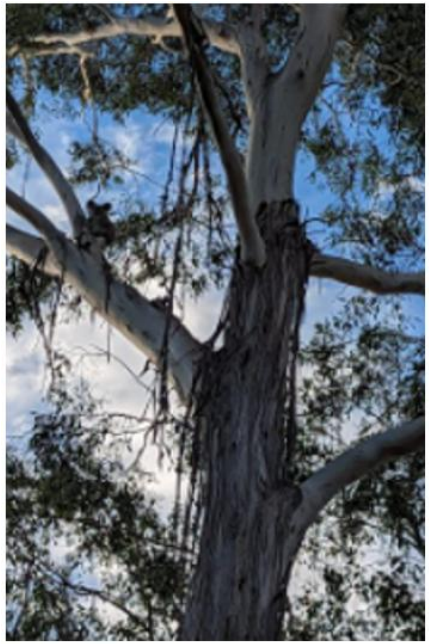

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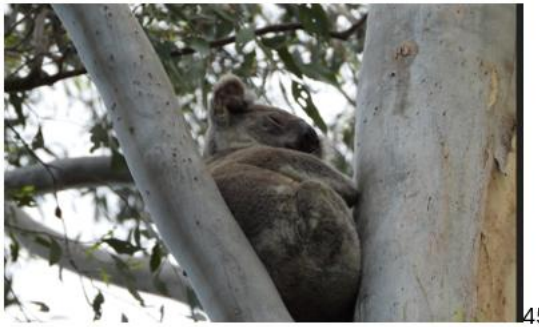

45#4/12/23

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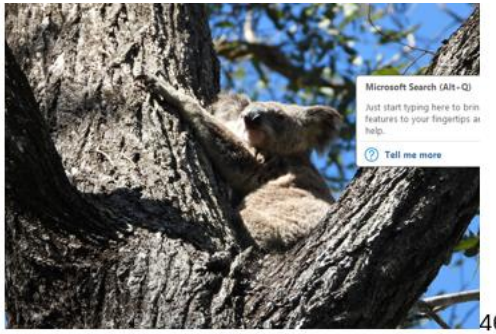
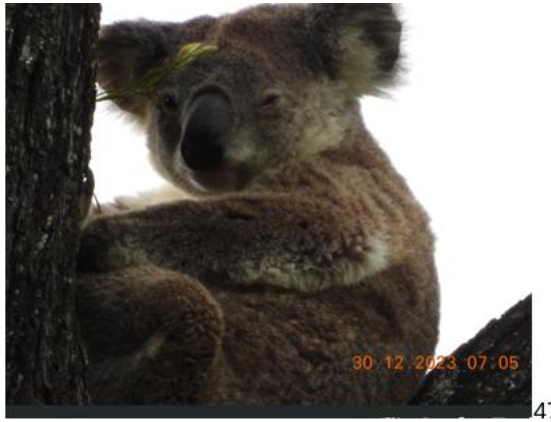


46# 7/12/23

Coordinates
27.62218° S,
152.90239° E



47# 30/12/23

Coordinates
27.62218° S,
152.90239° E

48# 29/01/24

Coordinates
27.62223° S,
152.90140° E

49# 4/02/24

Coordinates
27.62226° S,
152.90144° E

50#24/02/24

Coordinates
27.62156° S,
152.90220° E

51# 25/02/24

Coordinates
27.63548° S,
152.89209° E

52# 29/02/24

Coordinates
27.63590° S,
152.89156° E

53# 29/03/24

Coordinates
27.64727° S,
152.88908° E

54# 29/03/24

Coordinates
27.63565° S,
152.89342° E

55# 10/04/24

Coordinates
27.62181° S,
152.90248° E

56# 16/04/24

Coordinates
27.63557° S,
152.89284° E

57# 29/04/24

Coordinates
27.64258° S,
152.89609° E

58# 4/05/23

Coordinates
27.64441° S,
152.90121° E

59# 15/05/24

Coordinates
27.62188° S,
152.90239° E

60# 27/05/24

Coordinates
27.64446° S,
152.89557° E

61# 7/06/24

Coordinates
27.62158° S,
152.90238° E

62# 16/06/24

63# 5/07/24

64# 6/7/24

Coordinates
27.62700° S,
152.90126° E

65#

66#

Coordinates
27.64967° S,
152.90100° E

67

Coordinates
27.62700° S,
152.90126° E

Appendix 2

Photos of erosion and weed infestation along the line of the upgraded sewer main.

Appendix 3

Existing Woogaroo Forest tree cover (6 photos)


31.07.2025 13:38


07.09.2024 07:09

Existing Esk Off set area tree cover (3 photos taken from EPBC application documentation)

Assessment Unit 1 – Juvenile patchy regrowth RE12.9-10.2

Assessment Unit 2 – Open grazing land RE12.9-10.2

Assessment Unit 3 – Advanced regrowth RE12.9-10.2

Existing Avondale offset area tree cover (4 photos taken from EPBC application documentation)

Assessment Unit 1 – Cleared grazing paddock RE12.11.14

Assessment Unit 2 – Cleared grazing paddock RE12.3.3

Assessment Unit 3 – Disturbed remnant waterway RE12.3.7

Assessment Unit 4 – Cleared grazing paddock containing scattered mature eucalypts RE12.9-10.7

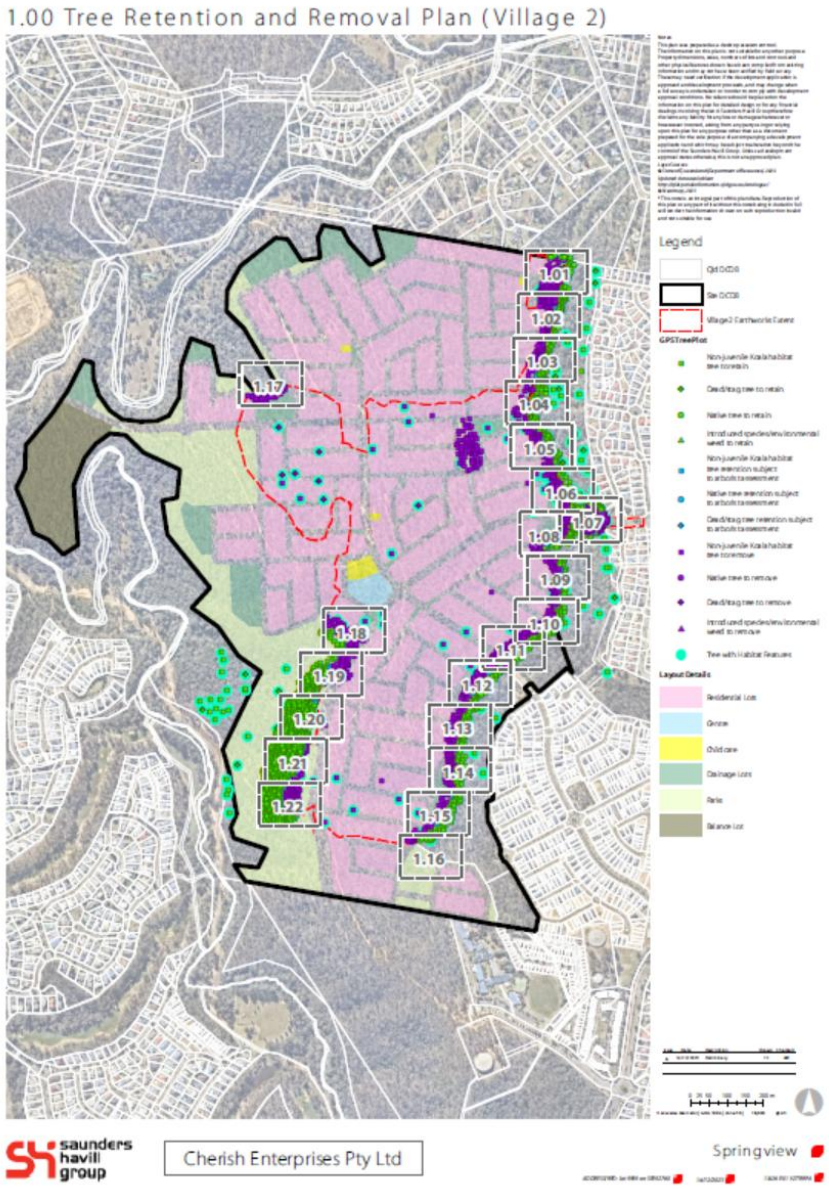
Mt Walker off set area tree cover (3 photos taken from EPBC application documentation)

Assessment Unit 1 – Non-remnant RE12.3.3.

Assessment Unit 2 – Non-remnant RE12.8.17/12.8.16

Assessment Unit 3 – Regrowth RE12.8.17/12.8.16

Appendix 4


1.00 Tree Retention and Removal Plan (Village 2)
1.01
1.02
1.03
1.04
1.05
1.06
1.07
1.08
1.09
1.10
1.11
1.12
1.13
1.14
1.15
1.16
1.17
1.18
1.19
1.20
1.21
1.22
Legend
GPSTreePlot
Layout Details
saunders havill group
Cherish Enterprises Pty Ltd
Springview

Proposed Cut and fill earthworks showing up to 14 meters cut from ridges to fill up to 14 meters into valleys (from documentation submitted to ICC)