

To whom it may concern,

**REF: EPBC Case Number 2020/8629 (Peninsula) AND EPBC Case Number 2020/8651 (Scenic)**

**This submission covers both of the proposed developments and I have emailed both of the developer's emails in this regard. I would like them to be considered for each development separately for each development, and by the EPBC/Environmental Department in making decisions.**

I am writing to express my strong opposition to this proposed development plan for the "Peninsula Precinct" and "Scenic Precinct" in Woogaroo Forest. As a concerned person who has been a resident of Ipswich, I believe that approving further development in this area would have significant negative impacts on our community, our culture and the environment. This area is one of great cultural and ecological importance.

Woogaroo Forest is a vital ecological area that supports a diverse range of flora and fauna, including several species that are listed as threatened in Queensland. The forest provides habitat for koalas, powerful owls, brush-tailed phascogales, platypus and other native wildlife. The destruction of this habitat would not only threaten these species but also disrupt the ecological balance of the region. This could have impacts from adjacent Ipswich suburbs through to the Western and Southern suburbs of Brisbane.

Local community opinions on the proposed development of Woogaroo Forest are strongly opposed to the project. Many residents and environmental advocates are concerned about the impact on local wildlife, particularly endangered species like koalas, platypus, greater gliders and powerful owls. The forest is very biodiverse and is a crucial habitat that supports over 130 native species, the ecological impact of developing this area proposed by the developer would cause ecological, cultural and social negative impacts spanning generations.

**Below I will detail reasons in which why I believe that the development should be rejected.**

*Per information from the latest Saunders Havill ecological report:*

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

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

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

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

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

**Matters of National Environmental Significance (MNES), Native Animals that are vulnerable/endangered and reasons not to develop these remnant forest areas:**

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

*Examples:*

1. Swift Parrot habitat surveys were completed in March 2020 per Section 3.3.1 of their Peninsular Precinct report. This information should not be relied upon, as the information is not current, and the accuracy is therefore called into question. Colloquial sightings noted in 2019 and 2014 are potentially misleading, as there have been reports of other sightings much more recently to this by local birdwatchers in the Ipswich and Toowoomba.

2. Anthochaera phrygia (Regent Honeyeater), it is noted from SCG and Saunders Havill about sightings of this bird in 2019. An important question is, have there been any surveys completed for this extremely significant bird species? Most of the information about the Regent Honeyeater in section 3.3.2 is anecdotal and there are no quantifications or studies to show whether there are populations. Studies need to be undertaken at the site for birdlife, not just relying upon media/news or hearsay. I personally have seen Regent Honeyeaters in Camira and Collingwood Park, not too far from the proposed developments of this forest area. The information provided by SCG once again has not been sought out or presented appropriately by this potential developer. Therefore, more information is needing to be sought – and the application to develop I suggest this application by the potential developer to be rejected.

Also, it must be noted that the fact that this land is patrolled by the owners and everyday people do not have ready access to look for birds in this area, it is not uncommon for there to be a lack of data in areas which there has been censorship of people being able to access areas to birdwatch/view potential endangered species.

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

4. Koala (*Phascolarctos cinereus*) – There is lots of recent evidence that this forest is of great importance to koalas. Without this forest area, koala habitat will be severely impacted in the Ipswich region, and breeding, biodiversity and genetic variability will be massively impacted.

It is my perception that BAR passive acoustic recorders are the best way in which to get information about birds and animals living in these forested areas, I do not believe the potential developer has done enough investigation into the area. It is evident that not a lot of assessment is happening for the 450ha of 4 developments which are currently in process of review by EPBC.

*Due to this information by SCG and Saunders Havill being Low Confidence, and relying on potentially misleading information, I believe that more data and investigation is needed, and that the application to develop should be rejected. **This point alone should see this application for development rejected,***

as the applicant should need to provide the EPBC with adequate information for all species under threat, per threatened species and ecological communities (MNES).

I have attached recordings (BAR passive acoustic recorder captured) (.wav files) and audio waveforms which were collected by an Ecologist in the "Woogaroo Forest" area. This includes the calls of the Bush Thickknee, Grey Headed Flying Fox, Koala and the White-throated Nightjar. After only a very brief look at the recordings, it was noted by the Ecologist there were a broad range of birds represented, including species that have declined in many south-eastern Queensland peri-urban bushland remnants. Examples as stated above, include Bush Thick-knee and White-throated Nightjar.

All these animals had their calls recorded in the forested area in question. The clearing of this area will greatly impact these animal species and many more. Many more recordings have yet to be analysed due to time constraints of this submission process so close to the holiday season (Dec 2025).

Attached is also a recording from an Echidna conservation team that provided recordings from a single camera (1) of their multiple cameras that were based in the forested areas that are currently being assessed (proposed Scenic and Peninsula developments). In the video there can be seen animals such as the bush turkey, kangaroos, wallabies (with babies/joeys) and echidnas. This is only recording from a single camera, there is much more data available showing the biodiversity and the many vulnerable animals present in Woogaroo Forest.

#### **Indigenous Perspectives and Cultural Perspectives:**

It has come to my attention through conversations with vulnerable people from CALD backgrounds, predominantly those from Aboriginal backgrounds, that they are massively concerned about these two developments Scenic/Peninsula. I have been told by Jagera Elders who I have yarnted with, many based in Inala and in-and-around the Woogaroo Forest that "[they believe that the forest holds cultural and ethno-botanical significance to their people/mobs"]

Medicines from plants and fungi are important to traditions, culture and identity. Erasing this culture, identity and ability to access traditional medicines would be considered massively detrimental to Aboriginal people.

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

#### **Loss of a Valuable Environment Forever and Other Potential Environmental Risks on the Community:**

1. In many cases replanting trees lost due to clearing of this forest could take up to 80-100 years for these trees to be planted, mature and to act like a forest such as this. Economically and environmentally the only reasonable action would be to protect this forest area and reject the proposed developments. Notably frogs/amphibians were barely mentioned in this submission, but would definitely be impacted by development.

Animals need hollows and bark of developed trees to have homes, to knock this ecosystem down there is nowhere else for any of these animals to go. Not only mammals and birds, but invertebrates will also be massively affected by these developments too. This is something that the SCG have not taken into consideration in their applications.

Land clearing for development in areas of Queensland devastates invertebrates by destroying their diverse habitats (e.g.: leaf litter, logs, soil), leading to loss of specialists (e.g.: native bees, snails, etc), reducing overall diversity (homogenisation). It also causes altering in soil/water quality (sediment, pollution), therefore greatly impacting crucial roles in ecosystems like decomposition and pollination.

Specific groups affected include invertebrates such as ants, beetles, springtails, worms, spiders, earwigs, cockroaches, bugs, butterflies, snails, etc), with many specialist species facing decline, (despite some generalists thriving in disturbed areas).

Sources:

1)[https://www.tmr.qld.gov.au/\\_media/busind/techstdpubs/environment-management/fauna-sensitive-transport-infrastructure-delivery-manual/fstid-chapter-20---invertebrates.pdf](https://www.tmr.qld.gov.au/_media/busind/techstdpubs/environment-management/fauna-sensitive-transport-infrastructure-delivery-manual/fstid-chapter-20---invertebrates.pdf)

2)<https://soe.dcceew.qld.gov.au/overview/environment/biodiversity>

*In this report provided by SCG and Saunders Havill, I do not believe there is mention that they are looking to take off ~14 metres of topsoil to be able to complete this project and the other developments they have planned.*

*Loss of topsoil (especially 14 metres, which is a very large amount for an area such as this) can have significant negative impacts on adjacent already built areas, primarily by compromising the foundational stability, increasing the risk of flooding and/or landslides, and causing infrastructure damage from sedimentation and altered water flows.*

*This could cause massive impacts to people who are living adjacent to this native forest under threat of clearing/destruction. “It is noted that best practice controls proposed by Springfield City Group go above and beyond mandatory ICC standards”. This comment by SCG is vague and does not actually document what environmental impacts there could be from the development of the site or what techniques/practices or measures will be put in place by the group if they were to be successful in their bid to develop the land. This is concerning, as they have not taken into consideration any effects on the landowners and people in communities adjacent to the forest and how it could affect their properties/businesses etc. Measures have been briefly noted for the animals in Table A45, however, as previously stated the proposed developer has not completed adequate and up to date assessments on the animals/land/area with much of their reports being Low Confidence source material, very much out of date and needing updating.*

***I believe they also should have an independent Government Based survey/analysis of this land area, as reports and survey information seem to be biased or potentially misleading at many times when reading through the source documents.***

*If an everyday person from the community failed to be able to provide evidence/reports for a development or build in their yard/home, they would likely be rejected for their application for their works. It is my perception that the government should do the same for these developments.*

#### **Woogaroo is a Very Significant Vineforest Site:**

*The importance of Woogaroo Forest (the proposed developed land of these two proposals) as a significant vineforest was identified in 1997 in a conservation assessment of vineforest across Queensland (WWF, 1997\*). That report noted that ‘the number of seriously endangered plant species in the South-East Queensland vineforests is alarming’ (page 12).*

*At that time, the report noted that the Queensland Department of Environment had been making good progress in conserving vineforests, particularly through converting them to protected areas (page 13). However, it called for greater funding and support for vineforest restoration work, including at Woogaroo Creek (page 26). We strongly urge that this call be picked up again in 2025, to ensure the protection of this fragile and critical area. **The Woogaroo Vine Scrub is one of only four remaining in SEQ.** It is imperative for the conservation of other listed flora species that the Woogaroo forest remains intact.*

#### **Conservation of Vineforests in South-East Queensland**

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

**Overall, this proposed action is a controlled action and should be rejected!**

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

Thank you for your time and for considering my submission, its contents and attachments.