



Save Woogaroo Forest Group Inc.

15th Dec 2025

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

EPBC.Referrals@dcceew.gov.au

Dear Minister,

**REF: EPBC 2020/8651 “Scenic Precinct”,
Springfield College Drive,
Lot 51 SP242316**

The Save Woogaroo Forest Group wishes to make a response to the request by Springfield City Group to clear 24 Ha of vital habitat, essential to the character of Springfield and the well-being of its citizens. This was deemed a controlled action in 2020, to be Assessed by Preliminary Documentation.

Firstly, we believe that this is the wrong process, as it should be at least **Environmental Impact Statement** due to the high number of MNES species associated with this block, and the high level of concern from residents of Ipswich. There is also a high level of concern regarding the integrity of this particular developer. In spite of their statements to the contrary (page vi), there has been no attempt to deliver any form of “best practice urban design” throughout Springfield, and this proposal continues that history.

A **Petition** calling for the preservation of vegetated areas, collectively called the Woogaroo Forest – including Lot 51 and Lot 50 – was tabled in the Senate in March 2025 and included over 15,000 signatories. This is a very high level of community angst at the prospect of complete destruction of the last vegetated areas in Springfield.

Secondly, Preliminary Documentation needs to be –

- a) “Unambiguous, succinct and objective” - the offered reports are **not** objective in the slightest,
- b) “Demonstrate consideration of Recovery Plans” – no avoidance and no mitigation of impacts due to tree clearing are offered for MNES. No recovery is possible here.
- c) Sufficient details to “describe the construction and operation of the residential development and associated works” – nothing on the scale or layout whatever. Absolutely nothing.

This proposal is seriously deficient in meeting these federal requirements. Of course, documents from developers are biased, by definition. The Department needs to gather its own independent expert advice and not rely on the biased opinions of developers.

Biodiversity Conservation Reform

In the current climate of reform to the EPBC Act and the objective of preventing development from continuing to cause declines in biodiversity, especially MNES, the Department needs to apply the old act with “recovery” of endangered Koala in mind.

Dr Ken Henry recently said – *“we have whole industries with business models built on the destruction of the natural world... We have turned nature against us. Our destruction of the natural environment now poses an existential threat to everything we value”*. (National Press Club, 16 July 2025).

Further calls for reform have been getting more strident. *“More clearing of koala habitat has been approved under Australia’s nature laws in 2025 so far than in any other year since the marsupial was listed as a threatened species, according to an analysis by the Australian Conservation Foundation”*. (Guardian, 9 Sept 2025). And Guardian 8 Nov 2025 – *“Will Labor’s environmental laws actually address Australia’s biodiversity crisis?”*.

A survey by the Biodiversity Council in January 2025 showed that there is a great deal of support from the public for improving the outcomes for biodiversity and reforming the current situation of declining outcomes.

This proposal seeks to push the Koalas of Ipswich ever closer to an extinction threshold. And the public are becoming ever more alarmed. There is a very real fear that the endangered koala is close to being made extinct here in the eastern suburbs of Ipswich. So, enforce the Act as it was probably intended to be enforced from the beginning. Recovery of MNES is the main aim.

National Strategies to Conserve and Recover Biodiversity

A key outcome for the Department of Climate Change, Energy, the Environment and Water is the **recovery** of biodiversity of national importance. A range of strategies, action plans and recovery plans have been published to guide the national effort. Plans such as, “Nature Positive” Plan, Threatened Species Action Plan, Strategy for Nature, the Koala Recovery Plan, and Grey-headed Flying Fox Recovery Plan, etc, ultimately define the purpose of the government.

Fundamental to all of them is the EPBC Act. Under Ecologically Sustainable Development (ESD) principles, development must not impact adversely on the ecological processes of life that underpin our society and economy. It must be “nature positive”. So, this development needs to demonstrate that it is “nature positive”; and that “best practice urban design” has been used to ensure the persistence of Koalas and other MNES, in our new suburbs.

The National Urban Policy further defines the government’s aims to create sustainable suburbs and “planning and development should support our path to net zero and provide opportunities for connection with the environment”. “Urban best practice” ought to be a necessary pre-condition for every application for tree clearing in the urban space. The Queensland QDesign Manual also covers similar aspects of best practice.

This proposal does not assist the recovery of any MNES. It certainly does not show any characteristics of “best practice urban design”.

Save Woogaroo Forest

The Woogaroo Forest is a connected collection of remnants of eucalypt forests scattered across Brookwater, Bellbird Park, Goodna, Gailes, Camira, Redbank and Springfield. Woogaroo Creek forms a central spine to this Forest. It supports a colony of Koalas that move around to cope with seasonal fluctuations – the koalas of the eastern suburbs of Ipswich.

Lot 51 is a part of this forest, and contributes substantial resources for koalas. The forest here is a mixed species dry sclerophyll forest that shows evidence of koala usage. It features a mature canopy of great complexity and supports other MNES, as well as a number of state threatened species (MSES). It has over 130 bird species. It probably has a number of cryptic threatened species, that have been found nearby, and would occur in habitats that are complex and enduring, such as this one.

Focus on Avoidance and Mitigation

The old EPBC Act always wanted a focus on avoidance and mitigation of impacts on MNES. Offsets were always an object of last resort, to deal with any small residual impacts. By

definition, offsets are not appropriate for “endangered” species. Offsets imply that the loss of individuals from a population of species at “very high” risk of extinction is acceptable, when the very opposite is the case - **every individual is vital to recovery**.

As Lot 51 is a steep block with low yield, it ought to be relatively easy to avoid and mitigate impacts on MNES. Opportunities to avoid MNES abound. The developer just couldn’t be bothered.

No Avoidance! No Mitigation!

So, in the absence of any real avoidance or mitigation of impacts due to tree clearing, this proposal ought to be denied.

Totally Inappropriate Offset to Conserve Koalas in Ipswich

An Offset has been proposed for Lot 51, over 50 kms away at Aratula. This is of no significant assistance to the koalas of Ipswich. It is even dubious for the koalas of Aratula. It is of no real help for all the other MNES relative to this project. Whilst new habitat will no doubt be created in a rural context, it will be 20 years before breeding populations could start to use the area, and maybe 40 years before populations actually increase.

Note that this offset is 15kms away from the nearest likely GHFF camp. This cannot help in the recovery of GHFF, especially in the Spring critical period.

Grey-headed Flying Fox (Vulnerable) Recovery

The mature canopy of mixed eucalypt species of the Woogaroo Forest generally is “Critical Habitat” for Grey-headed Flying Fox. In particular, Lot 51 forms a significant part of this resource. This forest provides a winter flowering resource essential for GHFF, who migrate northwards in winter to utilise these resources at regional level. The camp at Camira usually contains significant numbers of GHFF. Lot 51 is only about 2 kms from this camp although other camps are within striking distance and no doubt forage here too.

A critical time for GHFF is Spring, when pups are born and then carried by their mothers to feeding resources for about a month. By necessity, these resources need to be relatively close to a camp.

The highest Recovery Objective in the GHFF Recovery Plan is to protect and increase critical habitat, especially forests that flower during Winter and Spring. Conserving the forests of Lot 51 is therefore a national imperative. How easy is this – a steep block of high development costs and very low yield used to recover a number of national species of extreme importance.

This clearing proposal, based on absolutely no detail, should be denied.

Frillneck Lizard (*Chlamydosaurus kingii*)

The Frillneck Lizard has been found in this area, along the ridgeline that runs through Lot 51. It is such a striking species. It features in the federal Strategy for Nature 2024-2030 (page 23). Such an iconic species has thus become a virtual MNES and certainly one to consider at national level. This population is the southern-most occurrence in Australia – this is the limit of its range. Other colonies in the greater Brisbane area have now been made locally extinct. The nearest colony is up near Gympie. So, it is vital that this colony be preserved. That this species survives here shows how very complex the habitats are on Lot 51. In spite of assertions by the developer to the contrary, past logging obviously avoided this ridgeline, as there are numerous large (and therefore old) trees still providing the framework of a very complex ecosystem.

This proposal to clear 24Ha of critical habitat for MNES ought to be denied.

Keith McCosh

President

Save Woogaroo Forest Group Inc.