

WHITE PAPER

Woogaroo Forest: The Case for Permanent Protection and Why Clearing It Isn't the Answer to the Housing Crisis

A submission on the ecological, legal and economic case for refusing approval to clear Woogaroo Forest, incorporating an assessment of the housing-supply justification advanced in support of clearing

450 ha of significantly intact biodiverse bushland	1,000+ identified species on site
4 proposed developments under assessment	150+ ha of intact habitat at risk across all four proposals
29 years since the governing planning rules were last set (1997)	<10% of the 3,000 ha Springfield Structure Plan area set aside for wildlife, against a national 30% target

667 m² of forest cleared per dwelling in the largest proposal, Springview Village — while land at Springfield Central needs 0 m ² cleared per dwelling	10,000 apartments approved in concept at Springfield Central in 2016; only 503 have reached development application since
76.2% average share of land still held vacant after 9.5 years across nine major master-planned communities nationally, including Springfield (Prosper Australia)	2 of 4 EPBC referrals threatening Woogaroo Forest are lodged by the same developer group, Springfield City Group

Prepared for consideration by Federal and Queensland State Government decision-makers

Compiled from published material of the Save Woogaroo Forest Group Inc., public development-approval records, and independent research on land supply

Source: savewoogarooforest.com.au

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Executive Summary

Woogaroo Forest is a 450-hectare remnant of native bushland on the edge of Springfield, Ipswich, one of the last substantial areas of intact habitat remaining in a rapidly developing corridor of South East Queensland. It supports more than 1,000 identified species, including the Endangered koala, the Vulnerable powerful owl and grey-headed flying-fox, and the platypus, alongside Critically Endangered plant communities such as Lowland Rainforest of Subtropical Australia and one of only four remaining Woogaroo Vine Scrub remnants in Ipswich.

Four residential developments, referred under the EPBC Act between 2018 and 2020, now threaten more than 150 hectares of this forest. A federal decision is expected imminently, and once made, cannot be undone. The land is governed by a planning framework gazetted in 1997, before the koala held any national legal protection — which exempts the site from vegetation-clearing and koala-habitat protections that apply everywhere else in Queensland.

This submission makes two connected arguments. First, that Woogaroo Forest's ecological, cultural and scientific value is exceptional, well-documented, and supported by an unprecedented coalition of over 300 international experts and more than 21,500 members of the public calling for its permanent protection. Second, that the housing-supply justification commonly advanced for clearing this habitat does not withstand scrutiny once tested against the public record, because the same developer group behind two of the four proposals already holds approval for thousands of apartments on already-cleared, station-adjacent land nearby, most of which remains unbuilt a decade after being announced.

A direct comparison makes the trade-off concrete. Clearing habitat for the largest proposal, Springview Village, would remove approximately 667 square metres of forest for every dwelling delivered. By contrast, Springfield City Group's own already-approved, already-cleared apartment precinct at Springfield Central, immediately next to the railway station, requires zero further hectares of habitat cleared per dwelling, because the land has been vacant and available for years.

Key requests to decision-makers

- Refuse or decline to approve clearing of Woogaroo Forest under the four pending EPBC referrals.
- Review the koala-habitat and vegetation-clearing exemptions attached to the 1997 Springfield planning framework.
- Do not accept a generalised housing-shortage argument as justification for clearing Critically Endangered habitat without testing it against the proponent's own unbuilt, approved landholdings.
- Require disclosure of dwelling yield for the Peninsula and Scenic Precincts, and of current build-out status of the City Centre North precinct at Springfield Central.
- Commit to formal, lasting protection for Woogaroo Forest as part of Australia's national conservation targets.

PART ONE — THE FOREST AND THE THREAT

1. Woogaroo Forest: What Is at Stake

Woogaroo Forest is not a stand of trees awaiting development, it is a functioning ecosystem. Centuries-old ironbarks stand throughout the site, their dense, gnarled wood never having been worth a logger's saw, making them living relics of the landscape that once covered this entire region before the Springfield suburbs grew up around them.

Threaded through the forest's gullies are pockets of Lowland Rainforest of Subtropical Australia, listed as a Critically Endangered ecological community, home to threatened plants such as the Scaly Myrtle. Rising across the site is the Woogaroo Vine Scrub, one of only four remaining vine scrub remnants of its kind anywhere in Ipswich, a habitat types now reduced to a fraction of its former extent across the region.

This mature canopy and habitat connectivity supports the Endangered koala, the Vulnerable grey-headed flying-fox, gliders, the platypus and a wealth of other native wildlife in real time. The forest's flowering eucalypts and intact canopy also make it potential fallback habitat for highly mobile, nomadic species such as the Critically Endangered Swift Parrot and Regent Honeyeater, which range across thousands of kilometres of the eastern seaboard and depend on patches of intact habitat like Woogaroo remaining available wherever their unpredictable search for nectar takes them.

1.1 Species of National Environmental Significance

- Koala (*Phascolarctos cinereus*), Endangered
- Powerful Owl (*Ninox strenua*), Vulnerable
- Grey-headed Flying-fox (*Pteropus poliocephalus*), Vulnerable
- Platypus (*Ornithorhynchus anatinus*), Near Threatened
- Swift Parrot (*Lathamus discolor*), Critically Endangered
- Regent Honeyeater (*Anthochaera phrygia*), Critically Endangered
- Brush-tailed Phascogale (*Phascogale tapoatafa*), Vulnerable
- Tusked Frog (*Adelotus brevis*), Vulnerable
- White-throated Needletail (*Hirundapus caudacutus*), Vulnerable
- Scaly Myrtle (*Gossia hillii*), Critically Endangered
- Shaggy-leaved Plectranthus (*Plectranthus habrophyllus*), Endangered
- Slender Milkvine (*Leichhardtia coronata*), Vulnerable

"Woogaroo Forest is a much-loved and irreplaceable haven for threatened plants and animals, right on the doorstep of Brisbane. For Australia to turn around its dire conservation record, governments must conserve Woogaroo and similarly vital remnant habitats across Australia."

Professor Euan Ritchie, Wildlife Ecology & Conservation

2. The Threat: Four Proposed Developments

Four separate development proposals threaten Woogaroo Forest, each currently under assessment under national environment law. Together, they put at least 150 hectares of intact habitat at risk.

Development	Area	Proposal	Developer	EPBC Referral
Springview Village 2 & 3 (largest proposal)	120+ ha	1,800+ dwellings, town centre, sports field	Cherish Enterprises (prospective agreement with Stockland)	2019/8575
Peninsula Precinct	18.9 ha	Residential development	Springfield City Group	2020/8629
Scenic Precinct	24.2 ha	Residential development	Springfield City Group	2020/8651
Bellevue Woods	6.4 ha	74 lots	To be confirmed	2018/8350

Locations: Springview Village 2 & 3 at 7001 Mur Boulevard; Peninsula Precinct at 7002 Brookwater Drive; Scenic Precinct at 24 Springfield College Drive; and Bellevue Woods at 12–26 Eugene Street, Bellbird Park.

2.1 The habitat cost of each proposal: hectares cleared vs dwellings delivered

Housing need is frequently invoked to justify these proposals. To test that justification concretely, the table below sets out, for each proposal where figures are publicly available, the area to be cleared against the number of dwellings or lots proposed, expressed as habitat cleared per dwelling.

Proposal	Area to be cleared	Dwellings / lots proposed	Habitat cleared per dwelling
Springview Village 2 & 3	120+ ha	1,800+ houses	≈ 667 m ² per dwelling
Bellevue Woods	6.4 ha	74 lots	≈ 865 m ² per lot
Peninsula Precinct	18.9 ha	<i>Not publicly disclosed</i>	<i>Not calculable — disclosure gap</i>
Scenic Precinct	24.2 ha	<i>Not publicly disclosed</i>	<i>Not calculable — disclosure gap</i>
Disclosed total (Springview + Bellevue Woods only)	126.4 ha	1,874+	≈ 675 m² per dwelling

Dwelling or lot numbers for the Peninsula Precinct and Scenic Precinct are not disclosed on the public record reviewed for this paper. Their absence is itself a transparency gap: decision-makers cannot weigh the housing benefit of these two proposals against their habitat cost without this information, and this paper recommends it be required as a condition of assessment (see Section 13).

Even using only, the two proposals where dwelling numbers are public, clearing Woogaroo Forest habitat costs approximately 675 square metres of forest for every dwelling delivered, roughly the footprint of two typical suburban house blocks, per dwelling, in ongoing ecological loss. Section 7 sets out why this figure matters: the

same developer behind two of the four proposals already holds approval for thousands of dwellings that require zero additional hectares cleared.

"The social challenge of housing today should not destroy mature bushland, wisely kept by our ancestors. We must avoid arboricidal mania, long a problem in Australia."

Professor Margaret Grose, Ecologist & Landscape Architect

3. A Decision Three Decades in the Making

Woogaroo Forest's fate is being decided in 2026 or beyond, but the planning framework that allows these developments to proceed is almost 30 years old.

3.1 Timeline

1. Pre-1820s: The Jagera, Yuggera and Ugarapul peoples hold cultural connections to this Country for tens of thousands of years; the forest and its wildlife corridors stand intact.
2. From the 1820s: European settlement clears much of the surrounding Ipswich region, but the bushland now known as Woogaroo Forest survives as one of the larger connected remnants in the corridor.
3. 29 November 1994: An agreement is reported to have been entered into between the State of Queensland and Springfield Land Corporation Pty Ltd, one of the "Springfield Agreements." Its full text has not yet been located in the public record.
4. 1995: Parliament passes the Local Government (Planning and Environment) Amendment Act 1995, naming the Springfield Agreements directly in legislation.
5. 3–5 June 1997: The Local Government (Springfield Zoning) Act 1997 is introduced and passed within a single sitting week, giving Springfield a bespoke planning framework of its own. [11] The Springfield Structure Plan that followed was created when Paul Pisasale, later jailed for corruption, was Mayor of Ipswich. [12]
6. Later in 1997: The Springfield Development Control Plan is formally gazetted, and development rights begin to crystallise.
7. 26 March 1998: A Springfield Infrastructure Agreement is signed between Ipswich City Council and the Springfield development entities.
8. 1999: Federal Environment Minister Robert Hill introduces the EPBC Act, Australia's main national environmental law. On the ground in Springfield, however, the 1990s framework continues to operate, carried forward through transitional provisions.
9. 2012: The koala is listed as Vulnerable under the EPBC Act.
10. 2019–2020: The four residential developments now threatening Woogaroo Forest are referred under the EPBC Act.
11. 2022: The koala's national listing is upgraded to Endangered.
12. 2026: A federal decision is expected, once made, it cannot be undone.

3.2 The question this raises for government

The deeper question is whether a planning and infrastructure framework built in the 1990s should still be permitted to shape environmental outcomes in 2026, long after the science, the legal protections and community expectations that govern land elsewhere in Queensland have moved on.

Ipswich City Council confirms that the Springfield Structure Plan continues to operate as a separate framework under transitional arrangements, outside the current Ipswich City Plan 2025, and that development inside it is treated as exempt from certain vegetation and koala-habitat controls applied elsewhere, even on land mapped as koala habitat. The Plan covers 3,000 hectares, much of which was once wholly owned by Springfield City Group; the company has since developed and sold most of this land, retaining only partial ownership today.

Records not yet available to the public

- The 29 November 1994 Springfield Agreement.
- The original gazetted Springfield Development Control Plan, including its environmental studies and habitat assessments.
- The 26 March 1998 Springfield Infrastructure Agreement, with schedules and variations.
- Cabinet papers, explanatory notes and ministerial briefings behind the 1997 Zoning Act.

4. The EPBC Process and the Current Decision Point

4.1 What is a "controlled action"?

Under the EPBC Act, an action that is likely to have a significant impact on a matter of national environmental significance can be declared a "controlled action." This does not automatically block a project, but means it cannot proceed without formal assessment and approval from the Federal Environment Minister. The process runs through four stages: referral, a controlled-action decision, formal assessment, and a final decision of approval, approval with conditions, or refusal.

4.2 Why the Springfield Structure Plan matters here

The Springfield Structure Plan, gazetted in 1997, predates the koala's national legal protection entirely, yet exempts its entire 3,000-hectare area, including Woogaroo Forest, from the koala and habitat protection laws that apply elsewhere in Queensland. Against Australia's national target of 30% of land protected for habitat, less than 10% of the Springfield Structure Plan area has been set aside for wildlife. [8]

4.3 Public participation to date

For three of the four developments, Springview Village, Peninsula Precinct and Scenic Precinct, public submissions were collected by Saunders Havill Group, the environmental consultancy engaged by the developers. Approximately 1,500 public submissions are understood to have been made in relation to Springview Village, the largest of the four, earlier in 2026.

"Biodiversity offsets cannot replace a mature ecosystem like Woogaroo Forest. Approving clearing on that basis is not 'no net loss', but the irreversible loss of ecological integrity."

Professor Rowena Maguire, Director, QUT Centre for Justice

5. Expert and Community Opposition to Clearing

In 2026, a global coalition of more than 300 experts from at least 9 countries signed the 'Voices for Woogaroo' Expert Open Letter, formally asking the Federal Environment Minister to protect Woogaroo Forest in its entirety for future generations. [10]

5.1 Signatories include:

- The Hon. Robert Hill AC, former Federal Environment Minister who introduced the EPBC Act itself. [7]
- Professor Emerita Carmen Lawrence AO, former Premier of Western Australia.
- Professor Hugh Possingham FAA FRS, Chief Councillor of the Biodiversity Council and former Queensland Chief Scientist. [9]
- Professor Carlos Afonso Nobre, Earth System scientist, co-chair of the Science Panel for the Amazon.
- Professor Michael E. Mann, Presidential Distinguished Professor of Earth and Environmental Science, University of Pennsylvania.

They are joined by more than 300 scientists, legal academics, medical professionals, Indigenous leaders and community representatives from Australia and around the world. The Expert Open Letter, together with a Community Petition of more than 21,500 signatures, was formally presented to Environment Minister Murray Watt on 23 June 2026.

"Australia is being asked to do what every nation is, from the Amazon to the Congo: protect what mature native forest remains. Woogaroo is one of those decisions, and the world is watching how it is made."

Professor Carlos Afonso Nobre, creator, Amazonia 4.0 project

"People need somewhere to live, but decision-makers must stand firm to protect critically important wildlife corridors such as Woogaroo Forest. Ultimately, local residents will be the winners when the ecosystem services that Woogaroo Forest provides are preserved."

Dr Christine Hosking, PhD Conservation Biology

PART TWO — TESTING THE HOUSING-SUPPLY JUSTIFICATION

6. The Argument Being Used to Justify Clearing

Housing affordability and supply are genuine and serious national problems. The Australian Government's National Housing Accord target of 1.2 million new homes by 2029 sits against independent industry analysis suggesting the country will fall substantially short of that target. In this context, proponents of new residential development routinely invoke the housing shortage as a reason approval should proceed quickly and land should be released for building.

This paper does not dispute that more homes are needed, or that well-located, well-serviced land should be developed for housing. Its contention is narrower and specific to Woogaroo Forest: the housing-shortage justification loses force when the entity seeking to clear Critically Endangered habitat already controls thousands of approved apartment sites, on already-cleared land, next to a railway station, that it has chosen not to build.

6.1 What decision-makers are being asked to weigh

Two of the four EPBC referrals threatening Woogaroo Forest, the Peninsula Precinct (18.9 hectares, EPBC referral 2020/8629) and the Scenic Precinct (24.2 hectares, EPBC referral 2020/8651), are proposed by Springfield City Group, the same corporate group behind the broader Greater Springfield master-planned community. Together these two precincts account for over 43 hectares of the roughly 150 hectares at risk across all four proposals, and, per Section 2.1, their housing yield has not been publicly disclosed.

7. What the Public Record Shows About Unbuilt Capacity at Springfield Central

7.1 A 10,000-apartment masterplan, largely unbuilt a decade on

In 2016, Springfield City Group unveiled the City Centre North masterplan: a 60-hectare, transit-oriented expansion of the Springfield CBD immediately adjacent to the existing Springfield Central railway station. The masterplan, prepared by Urbis in partnership with Woods Bagot, included a mixed-use precinct with a retail hub, restaurants, a hotel, and capacity for around 10,000 dwellings. [4]

Nearly a decade later, council records show only one stage of that capacity, four residential towers of up to 12 storeys, comprising 503 units, has reached formal development application, on Eden Station Drive, Springfield Central. The application documentation explicitly records that the site "has been previously cleared for the development of the Springfield Town Centre North Precinct and remains vacant to facilitate the proposal." [5]

In other words: no forest needs to be cleared for these 503 units, or for the thousands of further apartments the original masterplan allowed for on the same site. The land is already cleared. It has been sitting vacant, next to a train station, for years.

Note on evidence: this paper relies on the development application as lodged and on the 2016 masterplan announcement as reported at the time. A definitive, current tally of how much of the original 10,000-apartment capacity remains unbuilt would require Springfield City Group or Ipswich City Council to disclose up-to-date figures, recommended in Section 13.

7.2 A pattern of metered land release

In 2024, Springfield City Group placed a further 12.7-hectare site, City West, within Greater Springfield on the market, with its chairman describing the sale as a way to "inject a new wave of activity" into the development, language that itself suggests the pace of activity is something the developer actively manages, rather than something dictated purely by external demand. [6]

"A lot of the heavy lifting has already been completed over the past 32 years with \$18 billion of social and physical infrastructure projects completed to date."

Maha Sinnathamby, Chairman, Springfield City Group, on the 2024 sale of the City West development site within Greater Springfield

8. The National Evidence Base on Land Banking

The pattern observed at Springfield Central mirrors findings from independent, data-driven research into how master-planned communities are actually developed across Australia, research that specifically examined Springfield as one of its case studies.

8.1 Prosper Australia's "Staged Releases" research

In 2022, the independent think tank Prosper Australia published *Staged Releases: Peering Behind the Land Supply Curtain*, analysing more than 25,000 lot sales across nine major master-planned communities in Queensland, New South Wales and Victoria, including Aura, Springfield and Yarrabilba in Queensland. [3]

- After an average of 9.5 years of production time, the developers studied still held 76.2% of their approved land banks vacant, across all permitted housing types.
- Sales rates responded strongly to price growth but were deliberately reduced when the market cooled, falling by 48.7% between the 2015–17 boom period and the 2018–19 downturn, avoiding the price falls that additional supply would otherwise have produced.
- Land prices across the estates studied grew at 5.5% per year in real terms, more than double the 2.4% growth in wages over the same period.
- The report estimated the national cost of this staged-release pattern to home buyers at \$5.9–6 billion and calculated that price growth added an average of \$194,010 per lot across the Queensland, NSW and Victorian estates studied, which specifically included Springfield.
- Only 23.8% of sites released by state governments to developers across the nine estates had actually been sold to home buyers over the 9.5-year study period.
- Springfield itself is one of Prosper's nine case studies, and its own figures are more pronounced than the nine-estate average: after 19.1 years of development, 77.24% of its approved land bank remained vacant, real land price inflation ran at 8.07% per year. Over the length of the project to January 2020, each home purchaser had to pay an average \$301,805 higher than the most affordable lot sold. Springfield is also the only one of the nine estates with its own dedicated enabling legislation, the Local Government (Springfield Zoning) Act 1997. As the report suggests, home buyers have contributed \$2.880 billion in higher charges than the minimum price offered. As the most profitable of the Master Planned Communities across the DPR and DPV metrics, alongside a significant land bank set to benefit from future land price inflation, it is reasonable to ask why this prodigious new city has not put a dent in local housing prices? [3]

"It appears that housing supply is the fair-weather friend of affordability. It is there in the good times, but as soon as the market sneezes, the rug is pulled out from the market. Forget red or green tape as the impost on prices — developers instead prefer to hold the approved supply behind a gold tape that they only release when the market is buoyant."

Karl Fitzgerald, Advocacy Director, Prosper Australia

8.2 Why this happen, the economics in brief

Because developers sell into a market they can influence but do not fully control, they have a direct financial incentive to release land at a rate that supports prices, not at the maximum rate construction and demand would otherwise allow. Land, in this framing, behaves less like ordinary retail stock and more like a monopoly-controlled asset, held and released to manage value, not simply to meet need as quickly as possible.

9. Who Is Asking to Clear Woogaroo Forest, and What Else They Hold

Precinct threatening Woogaroo Forest	Area	Developer	Same developer also holds unbuilt approved high-rise capacity at Springfield Central?
Springview Village 2 & 3 (120+ ha)	120+ ha	Cherish Enterprises (prospective agreement with Stockland)	No, different developer group
Peninsula Precinct	18.9 ha	Springfield City Group	Yes, Springfield City Group
Scenic Precinct	24.2 ha	Springfield City Group	Yes, Springfield City Group
Bellevue Woods	6.4 ha	C B Developments Australia PTY LTD	Unknown

Springfield City Group is directly responsible for two of the four proposals threatening Woogaroo Forest, accounting for over 43 hectares of the forest's 150 hectares at risk. The same corporate group simultaneously controls thousands of square metres of already-cleared, already-approved, station-adjacent land at Springfield Central that remains substantially undeveloped years after being unveiled.

9.1 The trade-off, side by side

The table below places the habitat cost of the Woogaroo Forest proposals directly alongside the equivalent figure for Springfield City Group's own unbuilt, transit-oriented capacity at Springfield Central.

	Habitat cleared	Dwellings delivered	Habitat cleared per dwelling
Woogaroo Forest proposals (disclosed dwellings)	126.4 ha	1,874+	≈ 675 m ² per dwelling
Springfield Central, City Centre North, Stage 1A	0 ha (already cleared)	503	0 m ² per dwelling
Springfield Central, full City Centre North masterplan potential	0 ha (already cleared, same 60 ha site)	≈ 10,000 (2016 masterplan capacity)	0 m ² per dwelling

This is the central asymmetry this paper asks Federal and State decision-makers to weigh: a developer cannot credibly rely on a general housing-supply shortage to justify clearing Critically Endangered habitat at a cost of hundreds of square metres of forest per dwelling, while simultaneously holding a decade-old, transit-oriented approval for thousands of apartments at zero further habitat cost, on land it has already cleared.

10. A Fair Hearing of the Housing Supply Debate

In fairness to industry, not everyone attributes Australia's housing affordability problems primarily to land banking. The HIA-Cotality Residential Land Report points to a record median lot price of \$391,420 in the September 2025 quarter, more than five times the price in 2000, [1] and attributes this chiefly to government-side constraints: slow rezoning, lengthy approval timeframes, and insufficient release of "shovel-ready" land, rather than to deliberate withholding by developers.

Separately, the National Housing Supply and Affordability Council's State of the Housing System 2025 report forecasts that only 938,000 of the targeted 1.2 million homes will be completed over the Accord period, a shortfall of 262,000 homes by 2029, attributing much of that shortfall to rising construction costs, higher interest rates, and approval delays affecting project feasibility, alongside record net overseas migration adding to demand. [2]

These are legitimate contributors to the housing crisis, and this paper does not suggest they are irrelevant. But they do not answer the specific question raised by Woogaroo Forest: why a developer holding a large, already-cleared, already-approved, transit-oriented site should need to clear additional Critically Endangered habitat elsewhere in the same master-planned city, before that existing capacity has been substantially built out. Government approval timeframes and construction costs do not explain why land that has been cleared and approved for a decade remains vacant.

11. Why This Matters for the EPBC Decision

Under the EPBC Act, the Federal Environment Minister's assessment of the Peninsula Precinct and Scenic Precinct referrals should not proceed on the unexamined assumption that clearing this habitat is necessary to meet housing need. The proponent's own broader landholding is directly relevant context: if thousands of approved apartments can instead be delivered on already-cleared, station-adjacent land held by the same developer at zero additional habitat cost, the marginal housing benefit of clearing Woogaroo Forest is materially lower than a generic housing-shortage argument would suggest, while the ecological cost remains the same, irreversible loss of Critically Endangered habitat.

This does not require proving that Springfield City Group's business decisions are unlawful or resolving the wider national debate about land banking. It requires only that decision-makers test the specific claim being made to justify this specific clearing, against the specific facts of what this specific developer already holds, approved and unbuilt, nearby.

PART THREE: POLICY IMPLICATIONS AND RECOMMENDATIONS

12. Policy Implications for Government

12.1 Outdated exemptions overriding current protections

A planning framework gazetted in 1997, before the koala held any national legal protection, continues to exempt a 3,000-hectare area from vegetation-clearing and koala-habitat laws that apply everywhere else in Queensland.

12.2 A conservation shortfall against Australia's own targets

Against a national target of 30% of land protected for habitat, less than 10% of the Springfield Structure Plan area has been set aside for wildlife.

12.3 The limits of biodiversity offsetting

Mature, structurally complex ecosystems containing centuries-old trees, Critically Endangered ecological communities and decades of habitat connectivity cannot be recreated elsewhere on a comparable timeframe. Treating offsets as equivalent to retention risks normalising a net loss of ecological integrity under the language of "no net loss."

12.4 A housing-supply justification that does not survive scrutiny

Where a developer seeking to clear habitat also holds substantial unbuilt, already-approved, transit-oriented capacity nearby, a generalised regional housing-shortage argument cannot substitute for proponent-specific evidence that clearing is actually necessary to meet housing need.

12.5 Transparency gaps

Key historical planning instruments underpinning the current exemptions remain difficult for the public to access. Dwelling yields for two of the four Woogaroo-threatening proposals, and current build-out data for Springfield City Group's other approved precincts, are similarly not publicly disclosed. Both gaps limit the ability of decision-makers and the public to test the claims being made in support of clearing.

13. Recommendations

13.1 To the Federal Government

13. Refuse approval or decline to approve without full retention of intact habitat, for the four EPBC-referred developments affecting Woogaroo Forest (referrals 2019/8575, 2020/8629, 2020/8651 and 2018/8350).
14. Require Springfield City Group to disclose dwelling yield for the Peninsula and Scenic Precincts, and the current build-out status of all other approved, undeveloped residential capacity it holds within Greater Springfield, including City Centre North, as part of assessing these referrals.
15. Treat unbuilt, already-approved capacity held by the same proponent as a relevant consideration in assessing whether clearing further Critically Endangered habitat is reasonably necessary.
16. Decline to treat biodiversity offsets as equivalent to the retention of mature, irreplaceable habitat in this assessment.
17. Consider the cumulative impact of all four proposals together, given their shared location and combined footprint of over 150 hectares.

13.2 To the Queensland State Government and Ipswich City Council

18. Review the koala-habitat and vegetation-clearing exemptions attached to the Springfield Structure Plan.
19. Increase the proportion of the Springfield Structure Plan area formally set aside for wildlife, towards the national target of 30%.
20. Publish current data on the build-out status of major approved but substantially vacant precincts within Greater Springfield, including City Centre North, to inform both this decision and broader housing policy.
21. Release, or facilitate public access to, the historical planning and infrastructure agreements underpinning the current exemptions.
22. Consider "use-it-or-lose-it" conditions on large-scale future rezonings and structure plan approvals, requiring demonstrated build-out progress within defined timeframes.
23. Examine whether a vacant-land levy or similar mechanism would help ensure already-approved, well-located land is brought to market at a pace that reflects genuine housing need rather than price management.

13.3 Jointly

24. Commit to formal, lasting protection of Woogaroo Forest, recognising its role as fallback habitat for nationally significant nomadic species and as one of the last substantial intact habitat remnants in this part of South East Queensland.
25. Commission or request an independent audit of unbuilt approved residential capacity across major Queensland master-planned communities, given Queensland estates (Aura, Springfield, Yarrabilba) were directly implicated in national land-banking research.
26. Ensure that future EPBC and State planning assessments of habitat-clearing proposals routinely test housing-need justifications against the proponent's own existing approved and unbuilt landholdings, and against disclosed dwelling-yield-per-hectare figures.

14. Conclusion

Woogaroo Forest represents a rare and increasingly uncommon circumstance: a large, intact, biodiverse remnant of native bushland, supporting more than 1,000 species, situated within a rapidly urbanising part of South East Queensland. Its future is not being determined by a lack of scientific knowledge, community engagement, expert consensus, or available land for housing — all four overwhelmingly favour its protection. It is being determined by whether a planning framework designed three decades ago will be allowed to continue dictating outcomes in 2026, and whether a generalised housing-shortage argument will be accepted without being tested against the facts of what the proponents themselves already hold.

The Hon. Robert Hill, who as Federal Environment Minister introduced the EPBC Act in 1999, has now signed the Expert Open Letter asking for that same Act to be used to protect Woogaroo Forest. The man who wrote the law is asking for it to be applied. Federal and State decision-makers now have the opportunity, and, this paper submits, the responsibility, to ensure that neither a legacy planning exemption from 1997, nor an unexamined housing-supply claim, override the protections that Australians, and the international scientific community, now expect for irreplaceable habitat such as this.

Put simply: before any further hectare of Woogaroo Forest is cleared in the name of housing, the proponents should be asked to build what they have already been approved to build, on the land they have already cleared, next to the railway station they already have.

Notes and References

[1] Housing Industry Association & Cotality, HIA-Cotality Residential Land Report, released February 2026, reporting a national median residential lot price of \$391,420 for the September quarter 2025, up 10.3% year-on-year. See HIA newsroom, hia.com.au/our-industry/newsroom.

[2] National Housing Supply and Affordability Council, State of the Housing System 2025 (Commonwealth of Australia, 2025), nhsac.gov.au. The report forecasts 938,000 completions against the 1.2-million-home National Housing Accord target over the Accord period (2024–29), a shortfall of 262,000 homes; net new supply after demolitions is forecast at 825,000, a gap of 79,000 against projected underlying demand.

[3] Karl Fitzgerald, Staged Releases: Peering Behind the Land Supply Curtain (Prosper Australia, July 2022), prosper.org.au/wp-content/uploads/2022/07/Staged-Releases-Prosper-Australia-web22.pdf. Springfield-specific figures (19.1 years in development, 77.24% of land bank vacant, 8.07% p.a. real land price inflation, \$293,458 average price gain per lot) appear at pp. 31–35 of the report.

[4] Urbis, “Springfield City Centre North,” project case study, urbis.com.au/projects/springfield-city-centre-north (masterplan prepared by Urbis in partnership with Woods Bagot for Springfield Land Corporation, 2015–16); see also Place Design Group, “Springfield City Centre North,” placedesigngroup.com/projects/springfield-city-centre-north, confirming masterplan capacity of 10,000 dwellings.

[5] Development application documentation for “Four Residential Towers & Parkland (Stage 1A),” Eden Station Drive, Springfield Central, Ipswich, as summarised in Your Neighbourhood, yourneighbourhood.com.au/eden-station-drive-springfield-central-ipswich.

[6] Springfield City Group, “Springfield City Group Provides Opportunity to Unlock Critical CBD Block,” media statement, springfieldcity.com.au/news, 2024; see also The Urban Developer, “Billionaire City-Maker Puts Large Springfield Landholding on the Block,” theurbandeveloper.com/articles/springfield-sinnathamby-land-sale.

[7] The Honourable Robert Hill AC, biographical note, University of Queensland Alumni and Community, alumni.uq.edu.au/story/5144/honourable-robert-hill-ac, confirming his tenure as Federal Environment Minister (1996–2002) and his role instituting the Environment Protection and Biodiversity Conservation Act 1999.

[8] Commonwealth of Australia. Achieving 30 by 30 on land: National Roadmap for protecting and conserving 30% of Australia's land by 2030. 2024.

[9] Professor Hugh Possingham's credentials (FAA, FRS, Chief Councillor of the Biodiversity Council, former Queensland Chief Scientist) are independently documented via the Biodiversity Council, biodiversitycouncil.org.au, and UQ School of Biological Sciences staff profiles.

[10] Save Woogaroo Forest Group Inc., 'Voices for Woogaroo' Expert Open Letter and accompanying signatory list, savewoogarooforest.com.au, delivered to the Federal Minister for the Environment on 23 June 2026.

[11] Local Government (Springfield Zoning) Act 1997 (Qld), Queensland legislation register, legislation.qld.gov.au.

[12] Paul Pisasale's conviction and sentencing for extortion (24 July 2019), with subsequent guilty pleas to corruption, fraud, perjury and other charges relating to his conduct as Mayor of Ipswich (2004–2017), is a matter of public court record; see contemporaneous reporting, e.g. ABC News, July 2019.

Save Woogaroo Forest Group Inc., savewoogarooforest.com.au - campaign website and source for petition, submission and signatory figures cited throughout this paper.

Readers are encouraged to consult the full 'Voices for Woogaroo' Expert Open Letter, the EPBC Act public portal, and the Springfield Structure Plan itself for primary source detail.