

To whom it may concern,

REF: EPBC case number 2020/8651

Quoting Saunders Havill's latest ecological report:

The Scenic Precinct project area occupies a total land area of 24.20 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 24.20 ha containing critical habitat for the Koala, Grey-headed Flying-fox, Regent Honeyeater and Swift Parrot. The proposed action is unlikely to have a significant residual impact on the Greater Glider or White-throated Needle-tail.

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.

Contemporary field surveys and wildlife remotely piloted aircraft thermal surveys detected the presence of Grey-headed Flying-foxes within and surrounding the referral area. In addition, the presence of eucalypt dominated vegetation communities provides suitable foraging habitat for the species particularly during winter flowering events.

*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.*

This proposed action is a controlled action and should be rejected!

There are a number of other reasons I believe that development plans for the Scenic Precinct should be halted in order to protect, preserve, and revitalize the forest for current and future generations, including:

1. In December 2025, the Queensland State government announce plans to develop a new **SEQ Koala Conservation Strategy 2026–2036**, with a vision to halt the decline of koala populations in the wild in SEQ and secure their long-term survival. The stated Targets of the strategy are:

- Stabilise koala population numbers in SEQ.
- A net gain in the total core koala habitat area.
- Commence rehabilitation to restore 10,000 hectares of koala habitat.
- Commence 10 programs in threat priority areas to support at least a 25 per cent reduction in disease, injury and mortality rates in those locations.

The December announcement stated that the strategy will review how current koala habitat regulations can be improved. **In light of this, I believe that the Federal approval process for the Scenic Precinct development should be paused, pending finalization and implementation of the new SEQ Koala Conservation Strategy. This would ensure that the fate of this Critical Koala habitat, and the current + future Koalas living there, can be assessed under the new guidelines.** Rushing the federal EPBC approval process would undermine the State's new Koala Conservation Strategy, and feed negative public perceptions that the developer's executive team and elected officials are pushing through approvals for these development plans before the new Federal and State environmental legislation are enacted.

2. This proposed development is one of series of developments that have been incrementally submitted for planning approval by the same developer over the past decades and is **a classic example of a 'death by a thousand cuts'** of this valuable forest ecosystem.

3. The firms responsible for this planned development, adjacent planned & completed developments within the Woogaroo Forest **have a history of misleading Federal and State regulators by arguing that each individual development should be approved because resident Koalas can simply move into the remaining adjacent forest, in full knowledge that the adjacent forest is earmarked for future development by the same firms** On the other hand, egregiously, as the remaining few development applications within the Woogaroo Forest are submitted, the firms claim that the remaining developments should be approved because the remaining forest has become too isolated and fragmented by their other developments, so is no longer worth protecting! (note that the remaining forest is larger and less fragmented/isolated than Toohey Forest (Mt Gravatt) with its thriving Koala population.

4. The firms responsible for this planned plus adjacent planned & completed developments within the Woogaroo Forest **have a history of misleading the public about their plans to destroy remaining portions of the forest**. For example, in 2024, the developer distributed flyers advertising residential properties for sale adjacent to the remaining forest, with a map labelling the entire remaining forest as a Conservation Park - in the knowledge that they were planning to replace the majority of the 'Conservation Park' with future developments. When concerned local residence showed a screenshot of the of the flyer to executives from the development company, the executive team claimed it was "fake", accusing the local residents of doctoring the image. Despite that false allegation, later that day, they updated the flyer on their website, removing the 'Conservation Park' label. They did not offer an apology or notify the public about the correction.

Similarly, numerous resident who have purchased properties from the developer adjacent to the remaining forest were told by developer's real estate staff that the remaining forest would never be developed, ensuring that their properties would enjoy long-lasting forest views and high resale values commensurate with that privilege. The developer's response to complaints from these residents is that they should have done more homework and not trusted the developer's real estate agents.

5. The developer's executive team and local elected officials [including the current Mayor of Ipswich] publicly claim that the Woogaroo Forest "is not a forest", despite the developer's environmental survey report (2025) states that "Vegetation surveys conducted across the site determined the referral area is dominated by species that achieve the definition of 'woodland' and 'forest' as referenced in the Koala Referral Guidelines." This is an example of the pattern of behaviour from the developer and local elected officials to downplay the ecological significance of the forest, intentionally misleading the public and elected officials responsible for approving developments with the forest.

6. Rather than destroying the remaining forest, the developer should prioritize development of high-density, high-rise apartments on land they have already cleared outside of the remaining Woogaroo Forest. **This would be a clear win-win – increasing the number of affordable family residential units in the region at the same time as protecting and preserving the remaining forest.**

7. Rather than destroying what is left of the Woogaroo Forest, the developer should prioritize development of high-density apartments in non-forested land with lower environmental and social value such as low-productivity farmland or existing urban areas.

8. The developer's and local elected officials have repeatedly **claimed that land on which this development is planned is exempt from environmental approval processes** because it received 'special' planning status in the 1990's. Since then, the conservation threat status of Koalas has officially increased, thus the 'special' designation of this land should be revoked.

9. Rather than reviewing and approving individual EPBC submissions in isolation, the Scenic Precinct submission should be reviewed holistically with the other current and future planned submissions covering the remaining Woogaroo Forest – to empower Federal staff to properly assess the collective impacts of proposed developments in the area.

10. The remaining Woogaroo Forest, including the portion earmarked to be cleared for the Scenic Precinct development, is **a globally-rare urban Wildlife hotspot that represents an exciting opportunity to create an urban forest park, similar to Vancouver's Stanley Park and Brisbane's Toohey Forest, that Ipswich & surrounding residents can enjoy for generations**, while providing a haven for the local Koala population to grow and thrive.

In summary, the Scenic Precinct housing development – one of many within the Woogaroo Forest - should not be approved. An inspiring and exciting alternative is for the land, plus the remaining Woogaroo Forest, to be developed as a world-class urban forest park, allowing its rare flora and fauna to thrive, and allowing SEQ residents to enjoy nature on their doorstep via a network of footpaths and bike trails – preferably connected to Brisbane's bikeway network. This would be an inspiring 2032 Olympic legacy.

Yours sincerely,