

Submission on Development Application A002844911, 12 Allambi Court, Corinda

To: The Chief Executive Officer
Brisbane City Council
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From: Shealagh Walker, President, on behalf of Centenary and District Environment Action Incorporated
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Signed:

Date: 28 January 2011

I am lodging this submission on behalf of Centenary and District Environment Action Incorporated. CDEA has reviewed the Development Application and requests that application be refused for the reasons set out in this submission.

Endangered Regional Ecosystem and Essential Habitat

As may be seen on the attached map of the Regional Ecosystems, the site is 100% covered by an endangered Regional Ecosystem, 12.5.2.

The map also shows that the site is classified under the Vegetation Management Act 1999 as Essential Habitat for the Koala, listed on the Nature Conservation Act as Vulnerable.

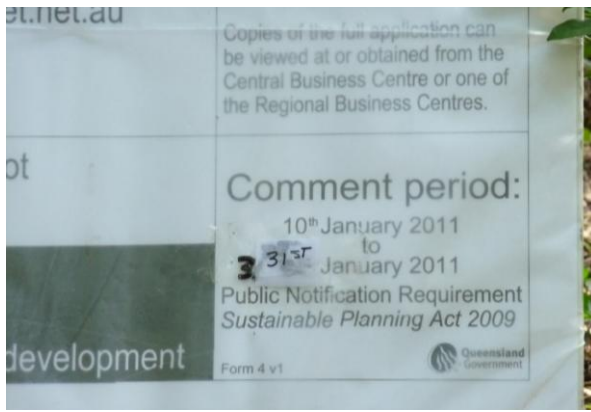
For these reasons alone, the site should not be cleared as the vegetation has statutory protection.

Dubious placement of Public Notification sign

Attached is a photo I took of the Public Notification signs for 12 Allambi Court. One is located well within *The Fort Bushland Reserve* off Eddystone Road. While this may be a gazetted road it is not a formed road. The notice has also been corrected with a patch.



Public Notification sign in bushland at the end of Eddystone Road.



Correction on Public Notification sign at the end of Eddystone Road.



Public Notification sign at the top of Allambi Court cul-de-sac

There is a second notice at the end of the cul-de-sac of Allambi Court. Very few people would see these notices. I don't believe the location of the notice and its correction are acceptable under the SPA.

Inadequate Vegetation Report

The vegetation report submitted by *The Tree Doctor* dated 29 June 2010 is incorrect in many ways.

Species

It notes a number of native trees as having been planted. It is difficult to understand how this conclusion was reached. The site abuts an area of remnant native vegetation where all these species are found growing naturally. What is the evidence that the trees were planted?

Brisbane City Council purchased the land immediately next to 12 Allambi Court in 2006; this tract of forest was formalised as *The Fort Bushland Reserve* in 2009. One of the main reasons that council bought this land was that it contains a valuable vegetation community. In fact, it is one of the few areas in the whole of Brisbane that contains Hoop Pines that have NOT been planted and that grow naturally on the site. Other than a *Grevillea* near the boundary, all the other species noted in the *Tree Doctor's* report as having been planted, actually grow naturally on the site, as they do in *The Fort Bushland Reserve*.

The vegetation survey is incomplete with at least 14 species that exist on the site not listed.

The site contains many significant Dry Rainforest species and is not 'dominated by pioneer species' as stated in the *Tree Doctor's* report.

The report only lists tree species, there are many native herb and grass species which are not noted.

Cat's claw creeper

Cat's claw creeper, *Macfadyena unguis-cati*, affected the adjoining bushland very badly for many years. However, since the land was purchased by BCC, the local Bushcare Group has removed cat's claw creeper from large areas of the adjacent bushland reserve in a relatively short time. Previously affected trees have responded very well and are thriving, there is significant natural regeneration including understorey species. It is impossible to understand the *Tree Doctor's* condemnation of the trees on 12 Allambi Court, on the grounds of cat's claw infestation, when there is a very successful example of its removal on the adjoining land where the forest is thriving and regenerating. Before weed removal was started, much of this forest was in worse condition than that on 12 Allambi Court.

Consolidation not fragmentation

At present the site in question is covered in bushland and functions as a part of *The Fort Bushland Reserve*. If development is allowed on 12 Allambi Court, this will essentially mean that the overall ecological area will be reduced, as will the biodiversity of the total area. It would be a far better solution if the area was consolidated rather than fragmented.

Steepness of land

The slope of the site would mean that extensive earth works would be required to create level platforms for buildings. Driveways would also require extensive cutting and filling. These earthworks would damage roots of adjacent trees and change the hydrology causing the rapid death of the trees in adjacent areas.

Fire breaks and tree hazard

No doubt, any future residents on the proposed 12 Allambi Court would want a buffer of nearby trees in the adjacent bushland to be removed for fear that they may fall on the houses or be a bushfire hazard. It is never the case that buffers for these hazards are made on the residential site, as in fact they should be. This would further reduce the bushland.

Fauna refuge

The area of bushland which includes 12 Allambi Court and *The Fort Bushland* is a fauna refuge and habitat area. It supports Squirrel Gliders and Short-eared Brushtail Possums which are both rare in Brisbane. Red-necked and Swamp Wallabies, Eastern Grey Kangaroos, Common Brushtail and Ringtail Possums, Echidnas, Northern Brown Bandicoots and Eastern Brown snakes inhabit the reserve. Various bats and other reptiles have also been recorded in the area.

Over two visits in July 2009 and January 2011, Dr Chris Wiley and I recorded 40 bird species.

In addition, John Lahey observed a Powerful Owl roosting in the reserve late last year. Powerful Owls are listed as vulnerable.

The site is classified under the *Vegetation Management Act 1999* as Essential Habitat for the Koala, listed on the *Nature Conservation Act* as Vulnerable. Koala scratchings have been observed on a Eucalypt at the southern entrance to Rocks Riverside Park. I do not believe there has been a search for Koala scratchings in *The Fort Bushland* or environs.

We note that there has been no fauna report completed for this application.

It is vitally important to the sustainability of this wildlife that the functional area of their habitat is not reduced.

Biodiversity

In addition to the large number of species of mammals, birds and reptiles noted above, the area is rich in flora. John Lahey, a member of the local bushcare group, has recorded 295 flora species in *The Fort Bushland* to date. This is truly remarkable.

Weed invasion

The location of gardens right up against the bushland is an invitation to further weed invasion. Many hours have been spent on *The Fort Bushland* in removing weeds. It would be a backward step to introduce more exotic plants which will, without a doubt, spread into adjacent bushland.

'Environmental Protection Zones'

Any development on 12 Allambi Court will cause the loss of most or all of the trees and other vegetation through clearing, earth works and disturbed hydrology, this is despite the inclusion of so-called 'Environmental Protection Zones'. In reality these do not work. In the first case the environment is fragmented which is destructive.

The earthworks in the land adjoining the 'Environmental Protection Zones' will cut tree roots and interfere with the water feeding tree roots. This will cause the death of the trees in a short time.

There is no follow-up of compliance with 'Environmental Protection Zone' requirements over the years and often the native vegetation is cleared, replaced by exotic garden plants or allowed to become weed-infested.

Conclusion

The functional ecological area of *The Fort Bushland* and adjoining bushland is a biodiversity gem that needs to be protected and not fragmented and developed. The loss of vegetation means the loss of wildlife habitat. Any development on 12 Allambi Court will cause the loss of most or all of the trees and other vegetation through clearing, earth works and disturbed hydrology.

We submit, for all the reasons noted above, that Development Application should be rejected by BCC.

End of submission