



Centenary and District Environment Action

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Submission on SEQ Koala State planning regulatory provisions

Response from Centenary and District Environment Action Incorporated (CDEA)

27 February 2009

To: Draft SEQ Koala State planning and regulatory provisions
Department of Infrastructure and Planning

By email to:
seqkoalareview@dip.qld.gov.au

From: Shealagh Walker, President, on behalf of Centenary and District Environment
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Centenary and District Environment Action Incorporated (CDEA) is a community environmental group which focuses on protection of the natural environment, public parkland and recreational areas and the mitigation of urban development impacts within the Centenary suburbs and neighbouring areas.

General comments

Sustainable koala population

The number of koalas required to constitute a sustainable population in SEQ has been put at 5000.

Two years ago the EPA stated that the koala population was 4800. These numbers have fallen since then and the koala population is at a crisis level.

For this reason alone there must not be any loss of koala habitat.

There should not be a policy of allowing offsets. The policy should be about protecting all existing koalas and their habitat and of providing more habitat.

In addition, offsets do not cater for koalas while land is being revegetated. This takes many years – what do the koalas eat in the interim and where do they live and breed?

The intention to have no loss of koala habitat is laudable but the proposed Draft SEQ KSPRP will not deliver this.

Lack of efficacy of the Draft SEQ KSPRP

The EPA is not a concurrence agency and the proposed regulatory provisions will not properly protect koala habitat within the urban footprint.

The Draft SEQ KSPRP do not hold sufficient authority over the protection of koala habitat. Regulations need to be obligatory and binding.

Much stronger protection is urgently required. The Draft SEQ KSPRP will not reverse the decline of koalas or even maintain the numbers that exist now.

Other factors that affect koalas

Roads

Roads are a major factor in development in SEQ and have major impacts on koalas and their habitat. These include fragmenting habitat as well as koala populations. The creation of habitat 'islands' must be avoided. These lead to inbreeding and local extinctions.

Regulations need to be put in place to ensure that the planning of road locations does not result in koala populations and habitats being divided and fragmented.

Another consequence of roads is the death and harm caused to koalas by vehicles.

Measures to avoid these need to be obligatory and should include the provision of sufficient and effective fauna crossings.

Bushfires

As has been seen in the current Victorian bushfires, koalas fall easy victim to bushfires. Where habitat areas are small, one bushfire can be devastating and can destroy an entire population of koalas and its habitat.

Koala habitat areas need to be of a substantial size, enough to counter parts of them being destroyed by bushfire. There should be enough habitat remaining for koalas to use after a bushfire. There should also be good connections to other koala habitat areas.

Pets in residential developments

It is well recognised that pets, especially dogs, take a heavy toll on koalas.

Residential developments must be obligated to make binding covenants over residential blocks for owners to control pets and thus protect koalas.

Specific comments on the Draft SEQ KSPRP

Map SEQKH5 (Version 1)

Additional Koala Habitat Protection Areas in the Centenary Suburbs

Map SEQKH5 (Version 1) in the Draft SEQ Koala State planning regulatory provisions, December 2008 shows interim koala habitat protection areas south of Wolston Creek in Wacol but none north of the creek.

There is good koala habitat in the Centenary suburbs and recent koala scratchings have been found in a couple of areas surveyed for these. There have also been koala sightings in the last

five years albeit not common. We recognise that koalas are very hard to see and we depend on sightings by local residents. There used to be many more koalas in this region.

Attached is CDEA's spread sheet of recommended koala habitat areas for the Centenary suburbs and district. This spreadsheet is based on the Koala Information Package Request by GHD which we had been given by a fellow environmentalist a couple of days before the final submission date for that. There was no information on the DIP web site about the GHD survey which is disappointing.

We are sending both the PDF file and the XLS.

With reference to line items ref 1 and 2, we have also attached a map showing the rear of properties in Correa Place and Burnside Crescent (in the paler green) which have a koala protection status.

We did not submit a map showing all areas as we did not have enough notice. However, we have taken up GHD's offer to fill in the hard copy map for us and submit it.

The attached data includes the RPD descriptor listing on the second worksheet, as consecutive Lot on Plan references, for ease of geocoding. Please discuss any further GIS matters with Ed Parker (tel: 3376 1389 email: eparker@bigpond.net.au) He can also supply GPS point data.

Clarity

The Draft SEQKSPRP is difficult to follow and this will be a problem in its implementation and compliance control. It needs to be presented clearly to ensure full understanding by its potential users.

Schedule 3 – Offsets for net benefit to koalas and koala habitat

See comments under 'Sustainable koala population' on page 1 of this document.

1.Purpose

In paragraph two there needs to be further definition of '*unavoidable need for development of certain types*'. This loose phrase gives open slather to approval of any proposed developments.

4.2 Duration of loss

'Any loss of vegetation that is to be re-established within three years of clearing to vegetation and landform that will provide equivalent habitat when regrown is only considered a temporary loss.'

In areas where there are koalas, where will they go for the period it will take 'lost' vegetation to re-establish which could take at least 10 years? This could be combined with the 3 year gap before revegetation commencing and leave a total gap of 13 years. This is unworkable.

6. Determining the acceptability of the offset package

The last paragraph makes no sense and requires clarification.

7. Implementation

Paragraph 7. We are of the firm opinion that it should be mandatory for private developers to provide an effective financial guarantee to secure compliance. Developers are notorious for ignoring environmental requirements of development conditions.

8. Glossary

For the purposes of clarity and understanding please add definitions for:

- **contiguous cluster**
- **high quality habitat**

In addition:

- **duration rating** needs further explanation and some examples
- **vegetation** – definition needs expansion as this word has a very wide meaning and koalas need a very definite type of vegetation in which to thrive