

16 December , 2016

Email : pdadevelopmentassessment@dilgp.qld.gov.au

EDQ Development Assessment

Dept of Infrastructure , Local Government and Planning

PO BOX 15009 ,City East, QLD, 4002

Dear Sir/Madam,

RE: MIRVAC DEV 2016/768 – DEVELOPMENT APPLICATION (Closes 19 December 2016)

Applicant: MIRVAC QLD PTY LTD c/- URBIS PTY LTD

EDQ No: DEV 2016/768 (QLD GOVT)

for 96 – 102 Brightwell St ,138 – 168 Teviot Rd and 456-520 Greenbank Rd QLD Greenbank, 4124

(Lots 205 & 434 on RP845844 and Lot 9 on S312355)

I would like to object to the whole CONTEXT PLAN, AREA 1 and development proposed by MIRVAC in **DEV 2016/768** . The reasons for my objection are outlined below .

- (1) In, **DEV 2016/768** MIRVAC are requesting permission to commence development in **AREA 1 in the South West corner (located closest to Greenbank Rd and Teviot Rd)** . This application reveals MIRVAC's intent to develop more of the property in the future - **Area 2** (proposed as " ECOLOTS" in the south-east part of property) and **Area 3** (Balance of Site between Areas 1 & 2) . This current application by MIRVAC does not include **AREAS 2 & 3** (presently referred to the Federal Government for EPBC approval for future development by MIRVAC) . I do not agree that **AREA 1** should be approved for development, because the whole of the MIRVAC site (482 ha) has much greater environmental value in this location and local landscape , it cannot be replaced. AREA 1 should be considered by the Federal Government in conjunction with EPBC assessment for Areas 2 & 3. An approval for **DEV 2016/768** is not be in the best interest of the community or the environment. **The protection of the whole site as an ecological asset would be of greater benefit, and the need for this protection is great at this location and in this area.** This application should not be approved
- (2) The application proposes to remove the dam (constructed around 1965) in the south-west corner. This dam provides water sources for fauna using this property . This dam has never been dry, but is proposed to be filled in as part of the development.
- (3) Rare and Threatened fauna known to be associated with the whole of the property include (but are not limited to) :
 - (a) EPBC protected species - spotted tail quolls (Endangered) , koalas (Vulnerable) , grey headed flying foxes (Vulnerable) , greater gliders (Vulnerable)
 - (b) Queensland NCA listed species - glossy black cockatoos(Vulnerable) , powerful owls(Vulnerable) , wallum froglet (Vulnerable) , tusked frog(Vulnerable)
 - (c) Logan City Council threatened species – wallum froglet, tusked frog , yellow bellied gliders, powerful owls , glossy black cockatoos
 - (d) Large mobs of eastern grey kangaroos (over 100+ individuals) and red neck wallabies on site utilise water sources and grass areas for feeding. Macropods are known to move from grass areas to woodland/forested areas. There have been no surveys of macropods undertaken in the Environmental Assessment. AREA 1 and the whole property has very significant value to Macropod species known to exist onsite (100+)

The whole of the MIRVAC site currently provides habitat, food and water sources , shelter and nesting for a variety of species NOW and supports biodiversity in the local landscape and region. The environmental values of this 482 hectare property (the largest land holding in the area and local landscape) provides **a critical stepping stone** in the landscape, fauna movement corridors that **cannot be replaced in this location – offsets will never compensate** for the loss of this environmental asset.

“ the subject site remains one of the last large rural properties in the immediate landscape predominantly comprised of rural residential development” (Saunders Havill Group MIRVAC TECHNICAL ECOLOGICAL ASSESSMENT REPORT p 3)

In this location, the best outcome for the community and the environment would be to **not approve** this application and retain all of the MIRVAC property as core habitat to protect remnant and regrowth habitat, fauna species, and biodiversity corridors .

4. NO PUBLIC TRANSPORT

There is no public transport – there should be no development. The region is a rural-residential area and without good public transport services in place **before any development commences**, this will increase traffic on local roads that are not designed to cater for this growth in population and traffic in this area. The traffic modelling provided in the application does not take into consideration the **cumulative traffic impacts** from multiple developments that have been approved already and that will commence e.g. Teviot Downs (Greenbank) , proposed North Maclean Industrial Area (4500+ vehicles per day proposed for that one location alone) , Flagstone development (further south) . Thus, the traffic modelling and traffic number estimates provided represent a significant **UNDERESTIMATE of future traffic numbers** through this area of Greenbank Rd and Teviot Rd . Increased traffic on all local roads will result in greater roadkill of native fauna e.g. kangaroos, red neck wallabies, koalas.This development should not be approved.

- (a) **Appendix H Movement Network Impacts** refers to the **Salisbury to Beaudesert Rail Corridor Study – Planning (p 6) .** Local residents have been informed about the ‘possibility’ of passenger rail for the last 30 years , however there are no final plans and no funding for this in 2016 . A recent news report in the local Jimboomba Times dated Wednesday 23 November 2016(page 4) reported Logan City Councilor Trevina Schwarz stating “ we’ve been waiting since the 80s to see some movement on the proposed rail line”, “ we still don’t have any confidence or confirmation on when and if the project will be delivered”. “ **The rail link project , set to commence after the completion of the Cross River Rail in 2026, is expected to cost up to \$2 billion**”. Previous funding for infrastructure priorities by the Queensland Government have prioritized the development of the western corridor between Ipswich to Toowoomba under the South-east Queensland Regional Plan. This MIRVAC application will not be able to provide mass public transport **at the commencement of development**. **This development should not be approved.**
- (b) *“Station locations proposed as part of the Salisbury to Beaudesert Review of Environmental Factors (REF) Study alter to that of the Greater Flagstone Urban Development Planning Scheme. In accordance with the Scheme, a station is proposed within 500m of the site in the vicinity of Leanne Court, however this location is not finalised, nor is the project committed for further funding.”*

There is no certainty for the community. The western end of Leanne Court is not suitable for a train station – spotted tail quoll sightings have occurred to the east and west of this location .

- (c) There is uncertainty even about proposed TRANSLINK bus services in relation to the proposed application.

The MIRVAC **Development Application Report (p25)** states “*The abovementioned road network provides further opportunities for a public transport (bus) route **to be delivered at a later date** by Translink “.*

- (d) **Mount Lindesay Strategic Transport Network Investigation – Strategic Planning (p7)** The public transport component of this project recommends the establishment of regional bus networks on major roads within and external to the PDA. Teviot Road is proposed to form part of the regional bus

network between Flagstone and Browns Plains. This study is strategic in nature and there is **no current programmed implementation of bus services** in addition to the very limited existing TransLink network centred on the Mt Lindesay Highway.

(e) **Interim Public Transport Service The PDA Development Scheme** requires development to contribute to an interim public transport service for up to 5 years or until the fare box income exceeds 30% of running costs, whichever is sooner. The implementation of this interim service **will be further investigated in consultation with relevant stakeholders including Translink and EDQ.**

It is evident that public transport will not be available in the immediate future – this development should not be approved .

5. CONTEXT PLAN CONCERNS

(a) VEGETATION & HABITAT CONCERNS

The existing vegetation has existing habitat, biodiversity and wildlife value – it should not be removed . **This development should not be approved.** No offset can replace this stepping stone or these environmental assets, especially at this location in the Greater Flagstone Area .

- “ approximately 2/3s of the site remains vegetated”(Technical Ecological Assessment Report p36)
- On site vegetation surveys confirmed “the majority of the site contains remnant [endangered, and of concern] and regrowth vegetation [endangered and of concern]”
- regrowth vegetation – has habitat value as well s e.g. koala and other species
- not of concern vegetation is important for providing connectivity and habitat to remnant vegetation areas
- All vegetation currently on this site provides habitat for fauna

(b) LACK OF CERTAINTY

The development application requests to “ lock in” elements of the CONTEXT PLAN , however, there are other parts of this application where MIRVAC requests “ flexibility” to make future changes e.g. **Area 2 is subject to future investigations.** However, the community is expected to comment on this Context Plan as it is presented now – the CONTEXT PLAN is intended to “become the principal planning document” for this site. This is not acceptable to the community.

(c) PROPOSED ‘ECOLOTS’ (AREA 2 – in SE part of MIRVAC site)

The 70 – 75 Ecolots in AREA 2 should be removed from the Context Plan and added to the Conservation Zone.

- Vegetation – Endangered and Of concern Regional Ecosystem
- Medium Value Bushland Koala Habitat Values – the south east corner has connectivity to community koala sightings to the SE of the MIRVAC property e.g. Appaloosa Court, Greenhill Rd, Crowson Lane
- Qld State Planning Policy – MSES Biodiversity – Wildlife Habitat over the whole of Area 2
- Logan City Council Planning Scheme Overlays show this southern section containing part of their Biodiversity Corridor
- Replacing ECOLOTS with a Conservation Zone will give greater protection to Norris Creek Catchment by protecting the habitat and land around the southern tributary of Norris Creek . It will connect the northern Conservation Zone with this southern area to make a larger Conservation Zone Area along the whole of the east side of the MIRVAC property.
- On the south boundary at 267 – 283 Crowson Lane (Greenbank) there is a **Queensland Government Koala Refuge property** (9 acres) -- koala tree planting has been undertaken on this property. Queensland Government money has been used to fund the planting of these koala

trees. Furthermore, the property at 267-283 Crowson Lane has had wild koalas on this property (e.g. 30 years ago and in 2015)

- ECOLOTS (Area 2) are indicated as subject to **FUTURE INVESTIGATIONS** (SEE p 10 -11 EDQ Development Application) – this means that the community is unable to have certainty now about this .
- The Area 2 ECOLOTS were proposed to include covenants – **who will enforce this?** Past experiences of building envelopes and covenants have not been enforced by Logan City Council (e.g. Bluff Rd corridors on QM Properties approved by Beaudesert Shire Council, building envelope regulations being relaxed , trees being removed where significant trees have been left by developers e.g. Carron Place at Jimboomba Woods, local residents selling property and covenants no longer applying to the property e.g, tree clearing)
- 70 -75 ECOLOTS – **traffic access is proposed via Serengetti Drive and Heathcote Ct (Munruben)** into the South-East section of the MIRVAC property is proposed through quiet local streets . These streets receive very minimal local resident traffic now. Increasing traffic (**potentially an additional 140 – 150 vehicles per day**) through quiet local streets (presently have cul de sacs) poses increased roadkill and injury risks to fauna e.g. koalas , eastern grey kangaroos and red neck wallabies which use this habitat on the south-east and east side of the MIRVAC property and places greater risks on the fauna of Wearings Reserve.
- Increased traffic (**140 – 150 + vehicles per day**) will occur on Serengetti Drive, Heathcote Ct , Greenhill Rd, Kensington Drive, Koorungal Rd, Crowson Lane with increased traffic, noise and safety concerns for local residents of the rural residential area of MUNRUBEN .

(d) Northern interface area (Northern section of Area 3 – Brightwell St and Campbell Rd)

The Northern Interface Area should be removed from the CONTEXT PLAN. This northern section should be retained as a linear park to extend from Teviot Rd to the Conservation Zone.

- Approximately 13 Residential Interface Lots (North) are proposed to connect to Brightwell Street and Campbell Road to the north. (possible increase traffic by 26+ vehicles per day)
- There is a December 2012 spotted quoll tail sighting from Teviot Rd about **100 metres south of the intersection with Leanne Rd** (in this application APPENDIX H reveals that Leanne Rd is proposed as a new road intersection and access point into the MIRVAC property). The quoll sighting was recorded in a Statutory Declaration by T. Herrera . The sighting observed the quoll moving from the west to east side of Teviot Rd at around 1.40 am. In the immediate area around the MIRVAC site, there are other quoll sightings from the area to the north , north-east and south-east of the MIRVAC property.
- Qld State Bioregional Corridors recognise this importance of this site and location – within close proximity to Greenbank Military Training Area and the Flinders-Karawatha Corridor
- Qld State Planning Policy – MSES Biodiversity – Wildlife Habitat over the whole of Area 3
- Logan City Council Planning Scheme Overlays show this northern section as part of their Biodiversity Corridor
- Vegetation - Of concern regional ecosystems in this area
- EPBC species sightings – quolls, koalas, great gliders
- To retain connectivity and corridors for koalas through this northern section to adjacent northern rural –residential properties. To retain connectivity and corridors to north for other native species
- Road access from the MIRVAC site to Brightwell St and Campbell Rd should not be permitted – **threatened species are known to occur** in this area and increased traffic movement through these rural – residential streets that currently have very little traffic (no through traffic) will increase road kill and injury risks to native fauna e.g. koalas, quolls, greater gliders, wallum froglet, tusked frog
- This location is near the northern tributary of Norris Creek.

(e) NORRIS CREEK & WATERWAYS

Environmental surveys have confirmed the habitat and ecological importance of Norris Creek, especially the central tributary that flows from west to east across the MIRVAC site. NO development in the northern section and south-east section of the property should be permitted – this will protect the water quality and habitat along the northern, and south-eastern tributaries , which flow into Norris Creek and runs through Wearings Reserve in Munruben. This supports the protection of the South-east part of the property as Conservation Zone as well. Norris Creek is mapped as Essential habitat for Wallum Froglet (Vulnerable NCA Qld).

(f) FLOODING

Existing residents in Munruben with properties affected by flooding along Norris Creek (e.g. Greenhill Rd) may receive greater flood impacts if vegetation is cleared. Clearing vegetation and increasing hard surfaces on the MIRVAC property will increase runoff . Norris Creek flows through sandy soils which erode very easily and increase sediment risks downstream as well.

(g) EROSION RISK

Clearing vegetation and increasing hard surfaces on the MIRVAC property will increase runoff which will cause greater erosion risks in the local sandy soils.

(h) BIORETENTION BASINS & SEWER PUMP STATIONS

Because Norris Creek is mapped as Essential habitat for the Wallum froglet (require low nutrient environments to reproduce) , any increased nutrients flowing downstream along Norris Creek or into local water bodies increase the threats to this species .

(i) ROADS

Roads should not conflict with vegetation areas being protected as part of habitat to be retained or the Conservation Areas. This creates safety conflicts for wildlife. Road speeds should be reduced for fauna and public safety. Looping roads in other areas in Logan (e.g. Boronia Heights) have experienced greater hooning and speeding issues.

(j) INFRASTRUCTURE

Site infrastructure should not be permitted through Conservation Zone or any areas proposed for retaining vegetation on the MIRVAC property (e.g. Ecolots) . Environmental assets should be protected , not use for infrastructure corridors e.g. sewerage, electricity, water, concrete paths.

Yours sincerely ,

NAME: _____

ADDRESS: _____

PHONE: _____

EMAIL: _____

