



## SAVE BAHRS SCRUB ALLIANCE

PO BOX 3340, LOGANHOLME, 4129

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September 21, 2012

### SBSA SUBMISSION ON THE DRAFT BAHRS SCRUB LOCAL AREA PLAN September 2012:

The Save Bahrs Scrub Alliance welcomes the opportunity to present views on the Draft Bahrs Scrub Development Plan and thanks Logan City Council for inviting community input and for attendance to the concerns raised herein.

Initially, SBSA maintains that the Draft Development Area Plan is based on a flawed foundation since the area could and should have been found unsuitable for development by Logan City Council and that the present process underway demonstrates an emphasis on achieving development yield from the Bahrs Scrub Precinct rather than an unbiased appraisal of suitability. SBSA also asks LCC to acknowledge that protecting identified areas requires taking into account impacts beyond those areas; and asks LCC to acknowledge the importance of considering the global context of biodiversity decline and anthropogenic climate change factors in all planning decisions. SBSA asserts that such global awareness is yet to become evident in the planning process and decisions relating to the Bahrs Scrub Precinct.

#### **EMAs:**

Council states EMAs will undergo no further development **except under existing lawful development approvals**. SBSA maintains that this reference to the existing approvals raises the need for Council both to disclose details of those approvals and act to prevent development of the properties in question commencing so as to ensure the integrity of the EMAs.

This stipulation also applies to extractive industry activity occurring on property adjoining a proposed EMA.

EMA2 appears to have been encroached upon compared with an earlier draft; is the adjustment due to activation of an earlier Approved and Undecided Development Application?



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### **WiMAs & WMAs:**

Excessive destruction of habitat adjacent to the Precinct reduce the effectiveness of wildlife movement/waterway corridors within the Precinct – even if animals could travel safely within the Precinct, where are they to go? Linkages with areas outside the Precinct are uncertain with development ongoing in important koala habitat connection areas such as Mt Warren Hill where the recent, unnecessarily excessive clearing for road expansion and an existing townhouse development application render legitimate wildlife movement farcical.

Fragmentation of wildlife and waterway corridors is also apparent as they all traverse and/or run adjacent to existing and proposed roads, the former marked for significant upgrading.

Adjacent open space is not necessarily also conducive to wildlife needs: golf course, recreational parks etc are fraught with danger for animals and simply unattractive to many species that are light and sound sensitive. Adjacent private property on acreage is also not guaranteed to ensure wildlife movement and other survival needs. Noise, litter, toxic chemical usage, and predatory domestic animals exist on these properties.

Windaroo Valley State High School will become an important neighbor for wildlife movement and waterways management, which has mixed implications. What roles, advantages and assistance have been identified for the school?

No mention is made of whether domestic pets will be prohibited on properties within corridors. Future developments are required to measure environmental values on the property but will there be a requirement to assess features of adjacent or surrounding properties to address issues of larger context? Will there be a requirement to further enhance environmental values of properties within the WiMA?

Wildlife Corridor routes suggested by Chenoweth & Associates, Stocklands, SBSA and BREC do not seem to have been taken into consideration.

### **SMAs :**

There appears to be an attempt to equate larger lot size with increased habitat conservation potential. While the opportunity for conservation undoubtedly exists with larger lot sizes, however, size in itself



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does not guarantee automatic conservation outcomes. Attention needs to be paid to auditing and assessment of existing vegetation and measures to preserve and significantly enhance those values on this land. Further, the allowance for smaller lots on less physically constrained land fails to acknowledge the need for support habitat in order to address well documented edge effects of human habitation. Council has the opportunity to preclude further threats to biodiversity values within the Precinct by removing this allowance altogether.

Existing land use rights as well as existing approvals need to be made clear for the public.

All SMAs require regulations prohibiting predatory domestic pets. Ideally, residents should be encouraged and assisted to pursue the benefits of regeneration of properties, including retaining and re-planting endemic flora, preserving and extending waterway vegetation, and weed, litter and toxins removal and avoidance. Effort should be made to more accurately identify existing flora and fauna values of land, in order to better inform future development applications suggested as permissible under the present Draft Plan. Ideally, SMAs should be absorbed into adjacent EMAs through voluntary acquisition in order to extend protection necessary to preserve the unique values of Bahrs Scrub.

In regard to SMA2, there is a need to know the size of 'smaller lot sizes' that may be permissible on lower value areas and where the lower value areas are. It is preferable that this provision be removed altogether in recognition of neighbor effects on biodiversity management, in particular koala habitat.

SMA5 and SMA6 represent ideal opportunities for Council to serve conservation rather than development yield interests. Development zonings should be removed altogether from these areas so as to secure (through voluntary acquisition and landholder conservation agreements) a more unified EMA and Waterway area rather than the fragmentation potential evident in the current proposed zoning.

### **Environmental Offsets:**

SBSA deplores the inclusion of environmental offsets as mechanisms for securing increased development yield at the expense and detriment of conservation priorities. Development yield must be secured without having to resort to environmental offsets.



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SBSA further notes that environmental offsets are seen as enhancing values of the broader area (of notably undefined parameters in the Draft Plan), and points out the unjust inconsistency of this perspective. As SBSA has alluded throughout our submissions, if such acknowledgement were made of the broader context of environmental loss and threat, the Bahrs Scrub Precinct would be recognised as unsuitable for any further development and in fact eligible for formal conservation through a Springbrook National Park model of voluntary land acquisition for National Park status.

All offset vegetation must be 'like for like' in order to attain any legitimacy, the above factors notwithstanding. Since much of Bahrs Scrub values is unique and location specific, it is difficult to accept that replanting and regeneration of the full and authentic range of endemic species potentially lost to development can be achieved.

Fauna offsetting and relocation, particularly of koala, is also deplored by SBSA. Even the paucity of research on fauna relocation projects shows what has been anecdotally well-noted, that fauna perish in the capture and relocation process either immediately or in the short to medium term, due to injury, overall stress and competition factors. It is not clear whether fauna offsetting is also intended as a (false) solution to increasing development yield from the BSP. SBSA calls on Council to remove this uncertainty for the community.

SBSA requests that land for vegetation offsetting including dedication of land to Council, be required to be secured from within the Precinct rather than outside of it. This requirement, coupled with a not-for-further-development zoning of presently suggested SMAs and other areas within the BSP, could serve SBSA's additional suggestion that voluntary land acquisition be pursued to extend formally protected areas within the Precinct. Land dedicated to Council if also within the Precinct could be utilized to extend protected areas.

If offset land is dedicated to Council outside the Precinct, Council must commit to ensuring the land is used for conservation and/or carbon sequestration purposes only, and must thus further require land to be established and maintained in an endemic vegetated state with minimized fragmentation.



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### Housing:

SBSA takes exception to Council's statement, 'Bahrs Scrub is identified in the regional plan as a Local Development Area that needs to accommodate a share of Logan's future growth.' This statement is misleading and inaccurate, with serious consequences. In fact, Bahrs Scrub was only identified in the SEQ Regional Plan as an area for *investigation* for its suitability as a Local Development Area, with conclusions to be drawn from such investigation by the local authority (LCC). LCC, as SBSA has repeatedly pointed out, has always had the option – and responsibility – to find the area **unsuitable** for development, as the ongoing constraints acknowledged by formal studies and Council's attempt at planning compromises (many unsatisfactory) make evident. It is in fact Council that has identified this area as 'a Local Development Area that needs to accommodate a share of Logan's future growth', and SBSA continues to maintain that this finding was flawed and blinkered, with undue priority given to development interests rather than far greater biodiversity, climate change and social imperatives.

The diversity and social support infrastructure features of the overall housing plan for the Precinct demonstrate sound recognition of modern planning design principles, but could only be considered sound practice if located in a less sensitive area than the Bahrs Scrub Precinct. Given that the BSP is a biodiversity hotspot further and dramatically constrained by geological, hydrological, bushfire, and amenity aspects, and the post-investigation federal listing of the koala as Vulnerable, the housing plan represents a level of neglect for the realities of this location that can only be viewed as either unconscionable or poorly informed.

Establishing 4,400 dwellings and 10, 100 inhabitants in a biodiversity hotspot must surely be considered incompatible and contradictory to mere common sense let alone to trained professionals educated in the principles of conservation. Council, as a state and federal co-relationship body, and employing properly qualified personnel, has ample and unfettered access to the recommendations of a raft of policies and research related to biodiversity condition and climate change mitigation/adaptation measures; the effects on biodiversity, waterways and carbon sequestration alone of injecting such massive human population pressure on this Precinct are so clearly adverse as to require Council to first reject Bahrs Scrub as a Local Development Area and failing that, to significantly reduce population and development yield to numbers better based on the immediate and greater regional carrying capacity.

Given the present dwelling and resident numbers proposed, Council must make clear at zoning stage the best practice features that should be imposed on developers and purchasers which include ongoing requirements such as:

- endemic species regeneration and planting



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- restrictions on exotic garden plantings
- no predatory animals
- hydrocarbon limitation infrastructure
- self-sufficiency in water and power supply
- waste and sewage disposal independence
- noise and light limitation
- heavily constrained vegetation removal
- heavily minimized hard surfaces
- minimal to zero landform disturbance in construction
- maximal carbon sequestration opportunity
- maximal biodiversity support opportunity

### **Centres:**

Environmental impacts of shopping centres including biodiversity and climate change impacts which encompass habitat destruction and human neighbor effects, waste, and water and energy consumption are well documented so SBSA again points out the incompatibility of such infrastructure within a biodiversity hotspot. Further, if the broader area context is to be consistently taken into account, a similar shopping centre has already been constructed in nearby Holmview with enormous impact on native vegetation and potential koala habitat. Similar construction at Bahrs Scrub would exacerbate biodiversity loss of even 'Common' species as well as that of previously and newly listed threatened species (such as the koala) and the carbon sequestration properties of the area.

While it is acknowledged that the design elements inherent to the Centres proposal represent an attempt to address the modern recommendations of good design principles by including bikeways, public transport hubs, and other infrastructure that meets community needs, the point is again made that this development loses its environmental and social credibility when proposed for this specific location.

The location of the shopping centre backs onto a WMA and thus massively increases human neighbor effects on biodiversity values of this corridor which is supposed to facilitate biodiversity needs.

Similar concerns arise over the location of the Neighborhood Centre as its establishment would require the upgrading and widening of Bahrs Scrub Rd. Not only must the existing, well-known Bahrs Scrub Rd biodiversity values not be compromised, but that of the proposed WMA opposite the Centre must also be properly protected.



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A major shopping centre will also serve to increase traffic within the Precinct (with the attendant human effects on biodiversity such as roadkill incidence, litter, noise and light pollution) with visitation from outside the Precinct.

The location of both centres does not show existing minor watercourses which will be destroyed by construction, thus impacting on the overall movement of water through the area and on the Albert River. Impacts on flooding for the general area are also neglected, taking into account the additional factor of increased hard surfaces.

Council must explicitly document the impacts to be anticipated from the establishment and operation of the centres proposed, and further explicate in detail the regulatory approach that may address each impact so as to negate or significantly minimize adverse effects on existing and potential Bahrs Scrub biodiversity. Failing to do so will be a failure to meet the responsibilities of Logan City Council's entrusted authority in regard to present and future generations.

### **Roads:**

The drastic impacts of roads, including roadkill and fragmentation issues, are also well researched, and additional and upgraded roads in the Bahrs Scrub Precinct represent unconscionable or poorly informed decision making which pays no heed to the area's biodiversity hotspot status.

New BSP roads proposed will add to fragmentation issues.

It is noted that the proposed Public Transport routes include Bahrs Scrub Rd which will necessitate upgrading despite Council's previous assurances that Bahrs Scrub Rd is not planned to be extended to four lanes. Bahrs Scrub Road in particular presents significant obstacles to upgrading impacts related to its known environmental constraints. Further, the existing WIndaroo Valley State High School requires attention to road safety, being already impacted by the busy intersection on Beenleigh Beaudesert Rd. SBSA continues to call for the downgrading of Bahrs Scrub Rd on environmental grounds.

Council must demonstrate that road construction within the Precinct generally will be minimized and any road construction will only be considered in line with current world trends in road ecology as popularized by Richard Forman in *Road Ecology: Science & Solutions*. The present draft falls far short of



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ecological best practice in road design with the expansion and upgrading of road networks, bringing a larger volume of traffic, heavier vehicle capacity and higher speed movement into the area; increasing fragmentation of wildlife movement areas and existing habitats; increased hydrocarbon and dust impacts; increased run-off and flood effects; and direct destruction of common as well as High Nature Conservation Value ecosystems in road construction, specifically Bahrs Scrub Rd.

### **Walking & Cycling:**

While Council's recognition of the range of associated benefits of planning for the inclusion of walking and cycling infrastructure is to be commended in general terms, again SBSA points out that this design inclusion is inappropriate in the context of the biodiversity hotspot values of the Bahrs Scrub Precinct.

Human neighbor impacts of wildlife disturbance, including mischievous and criminal treatment of animals, litter, vegetation disturbance, dust, noise and light, flora destruction, weed and disease spread and release of toxins are noted contributory factors to biodiversity decline. Thus the locating of walking and cycling path routes along waterways, parks and reserves constitutes increased risk to the biodiversity values of the Precinct and belies the ostensible planning ideal of balancing environment and development needs.

### **Fauna/Koalas:**

The recent but long overdue listing of Queensland koalas as a threatened species has enormous implications for the future viability of the Bahrs Scrub Precinct as a Developable Area. Although not adequately studied, the koala habitat areas of the Precinct are nonetheless known to the community as well as other stakeholders, including the Council.

The proposed planning changes for Bahrs Scrub are likely to trigger ministerial intervention under the EPBC Act since the Precinct holds significant koala populations. Owners of properties designated under draft development zoning may be given false hope of future financial benefit which cannot be realised given koala protection constraints. Present and future developers too could be adversely affected by koala protection requirements which are considerable. In the present difficult economic era predicted to





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persist and worsen, Council should not be encouraging significant financial outlay amongst development interests which could ultimately prove futile, or extremely complex at best.

The federal threatened species listing of the koala obliges LCC to revisit the decision to pursue the re-zoning of the Bahrs Scrub Precinct as a Developable Area and further obliges Council to work with State and Federal Government agencies to create an alternative management plan for the area which prioritises environmental values, in particular, unstinting koala protection. This altered approach to the Precinct would better serve the ethical and social needs of the Logan and wider community, be enhanced rather than constrained by the inherent features of the area, and potentially bring financial and reputation benefits to the area through its potential to provide tourism and education services.

The Precinct is also known to be home to a very large range of species, many of which are also listed as threatened. In the LCC context, Bahrs Scrub represents a natural treasure trove which can and should be preserved and utilised for eco-economic potential alone, let alone on larger survival or ethical grounds. However, the present, outdated perspective persists of exploiting the area for development related wealth, which only translates as economic advantage for a very few, despite development presenting more obstacles than opportunities.

SBSA notes that proper koala and other fauna surveys have still not been carried out for the Precinct or adjacent areas despite Bahrs Scrub being one of the most important HNCV regions for this State, and certainly for Logan City Council.

### **Flora:**

The BSP contains a variety of rare and endangered flora as well as newly discovered species, a fact that should be seen by Council and the community as a unique privilege rather than an impediment to urbanisation. Some of these species are documented in the booklet published by SBSA with Glenn Leiper under an LCC EnviroGrant.

Bahrs Scrub is known as being the last significant remnant of dry lowland rainforest, a type of which has been considered for listing as a NSW threatened regional ecosystem. A similar listing for Queensland examples of this RE is being campaigned for. LCC has a valuable part to play in achieving this listing which would be a proactive measure. The present focus of LCC on urbanisation comprises certain loss of parts of this RE, while offering benefit to very few and with long term repercussions. Council recognition



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of the value of Bahrs Scrub dry lowland rainforest would pave the way for its proper preservation, engender far less expenditure of public monies, and serve the best interests of the community instead.

### **Stormwater:**

Whichever of the proposed methods is adopted, the outcome/s for the natural environment and climate change mitigation must be prioritized. Land use that enhances overall habitat and ecosystem function is preferable and should be the aim above development yield and cost factors. Water quality considerations must be upheld as well to ensure optimal environmental and climate mitigation outcomes, keeping in mind that contributors to stormwater pollution, such as hydrocarbons, toxins, pharmaceutical ingredients and litter, result from human habitation of an area and in proportionate correlation with human numbers.

The averred disadvantages of the proposed stormwater systems demonstrate that the BSP is too heavily constrained to allow the required development yield.

### **Water Supply:**

As initially warned by SBSA, Council has now acknowledged that much of the BSP and a significant proportion of the draft developable area represent a challenge in supplying water easily and cheaply, or at all.

Supply of water to the High Level Zone has been identified as costly with actual cost and engineering feasibility information not available, a situation which SBSA considers unacceptable for the interests of conservation, the community, present landholders and developers.

It appears that Council is attempting to avoid admitting that physical constraints of the BSP render development yield unachievable by leaving inevitable findings to later development applications. This approach leaves property owners hopeful of investment returns that are most likely not to be realised; ratepayers potentially required to bear unnecessary future costs not only for infrastructure, but for investigative studies that will prove unfeasibility; conservation acquisitions and zonings being delayed yet again and indefinitely; and unnecessary and probably futile developer costs in what many economists are warning will be a protracted era of economic downturn.



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The boundaries for the High Level and Non-Serviceable zones are declared to be 'indicative only', with further engineering studies to be carried out. SBSA again considers this an unacceptable uncertainty and future expense burden for the Logan community, which remains unnecessary if the Precinct were instead recognised for its high conservation potential rather than its limited development yield potential.

SBSA does not support the establishment of an additional reservoir within the Precinct.

### **Wastewater:**

The claim that the whole area can be serviced with wastewater infrastructure is difficult to understand given that water *supply* is heavily constrained by steepness issues. Also, the claim that infrastructure can be established with 'minimal' upgrades appears to neglect the impacts to natural landscapes that must result from ground disturbance and vegetation removal.

### **Electricity:**

The proposed relocation of the powerline route along proposed road networks neglects the objections on environmental grounds to that road network, and raises additional concerns about environmental impacts of powerline establishment and maintenance. Further, the two sub-stations required comprise further loss of developable or natural area; the area adjacent to the Neighborhood Centre is also adjacent to a WMA, which gives rise to further concerns about impacts on species.

All powerlines should be placed underground.

SBSA expresses concern over future decisions of Energex on powerline routes and required infrastructure, given the extraordinary powers of the authority, unconstrained by environmental laws, and the track record of the authority in causing excessive environmental damage.

### **Social:**



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SBSA maintains that the social impacts on the immediate and larger area of the suggested population increase of the Bahrs Scrub Developable Area (BSDA) as well as numerous adjacent developments will be cumulatively detrimental to the existing community.

These impacts have been pointed out in detail in previous SBSA submissions on the BSDA: increased crime; increased litter; increased human and vehicle traffic; pressure on services, infrastructure and resources including roads, schools, shops, public transport; subsequent ratepayer costs; increased cost of living including housing affordability. In addition to the physical impacts on human wellbeing such pressures bring, attention is now being paid to mental health effects from urbanisation and lack of connection with natural landscape features. These impacts are not merely the burden of vulnerable individuals, nor the imaginings of biased environmentalists, but have been comprehensively quantified, and expressed in costs to the community as a whole in terms of public expenditure.

Larger issues of population carrying capacity for coastal shires and for Australia as a whole are inherent in development or conservation alternatives for the Bahrs Scrub Precinct. Rather than bowing to outdated, unsustainable growth perspectives that have proved ruinous to the long term wellbeing of humanity as well as other species, Council is advised to view Bahrs Scrub as an opportunity to address the diverse, real and officially acknowledged threats to human survival represented by environmental destruction through the application of the new and tested principles of sustainability.

Another issue of fairness extends to development interests. Global, national and state predictions of continued economic downturn or turbulence represent considerable business uncertainty for property owners and development companies. Bahrs Scrub is evidently a very costly and difficult area for development given its multiple constraints, including its status as a biodiversity hotspot. In hard times, developers are further threatened with false hope and uncertainty by Council's perseverance in attempting to achieve maximum development yield. This hollow promise may have already resulted in unwise and possibly ill-afforded investment in the area.

Council would be far more socially responsible in declaring the area better suited to future-proofed, ecology economics related industry instead and investigating on behalf of stakeholders the commerce opportunities available through conservation outcomes. These include biodiversity and carbon offsets for numerous other projects here and abroad, as well as educational and eco-tourism industry opportunities. Council also reaps an intricate network of indirect benefits from conservation outcomes



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for the BSP, including Albert River health, reduced carbon price impacts, and reduced maintenance and infrastructure costs.

### **Cultural:**

No mention has been made of the value of recognizing the Indigenous or European connections and historical associations with the Precinct, despite such interaction being considerable.

### **Other industry relevance:**

SBSA has previously called Council attention to the presence of native macadamia species in the Precinct, conservation of which is of crucial value to the Australian macadamia industry. Recent news of China's intention to overtake Australia as a major supplier of macadamias increases the commercial potential for conservation and regeneration of the Bahrs Scrub Precinct, as wild specimens of this commercially produced tree will be required in order to maintain viability of agricultural stock.

### **General:**

SBSA calls for

- the release of the Windaroo Creek Catchment Study to allow the community a better informed understanding of the impacts of the proposed Draft Bahrs Scrub Local Area Plan.
- information on and assessment of impacts of recent development approvals and existing but not acted upon approvals and applications relevant to the Bahrs Scrub Precinct, including extractive industry activity
- assessment by Council of anticipated impacts on the Draft Bahrs Scrub Local Area Plan of the recent listing of Queensland koalas as Vulnerable

SBSA supports submissions made by Glenn Leiper and Ted Fensom (BREC) on the Draft Bahrs Scrub Local Area Plan.



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