
28th February, 2019

Hon Michael de Brenni

Minister Housing and Public Works, Minister for Digital Technology & Minister for Sport

c/- Department of State Development, Manufacturing, Infrastructure and Planning – Planning Group

**Supplementary Information – Objection to proposal:
Proposed Ministerial Designation of land for infrastructure for
CLAY TARGET RANGE AT BELMONT SHOOTING CENTRE**

A MORE DETAILED EXPLORATION OF THE ISSUES RAISED IN OUR OBJECTION

MAIN ISSUES -:

1. Proposal is not essential infrastructure and needs to be demonstrated as economically viable and can avoid environmental impacts.
2. Existing shotgun facilities on site and the temporary facility built for the Commonwealth Games could meet current and foreseeable demand for public use and international competitions.
3. The site lacks a coordinated Biodiversity Enhancement & Protection Plan.
4. Protected Vegetation – avoid or minimise clearing of Koala Habitat and listed communities of conservation significance.
5. Current proposal has not considered minimisation of environmental impacts by extending the curtain and not clearing vegetation to the south of the curtain.
6. Offsets (for loss of Koala Habitat forest and protected Regional Ecosystem) to be properly formulated.
7. Lack of effective consultation with stakeholders.

WHY THESE ISSUES ARE IMPORTANT – an explanation:

1. Biodiversity Enhancement & Protection Plan:
 - A) There is no current coordinated plan in place for biodiversity for the entire site and its ecological sustainability and connectivity.
 - B) There are multiple layers of natural values, policies, mapping layers and protections on the large natural area (Belmont Koala Bushlands).
 - C) Currently ad hoc or uncoordinated actions, including dumping of fill and vegetation clearing, are taking place that do not take into consideration of the natural values of the site, its habitat, connectivity and wildlife.
 - D) Lack of additional planning and other protection for the remaining ~340ha of forest including its connection to council acquisitions in McKenzie, Prout Rd and Belmont Hills. No priorities for green infrastructure required to secure ecological connectivity e.g. Council & Regional priorities for Wildlife Movement Solutions.
2. Vegetation Offsets:
 - A) Offsets are a last resort. If the proposal will have impacts on prescribed environmental matters, the proponent has avoidance or mitigation obligations.

- B) According to the Queensland Environmental Policy an Impact area of 5 ha requires minimum of 15 ha of habitat replacement. Not just a number of trees planted.
- C) Offsets for this site should be predicated on the loss of 5.4 ha of protected forest, including all layers of vegetation - trees, shrubs, grasses/groundcovers.
- D) The life of a cleared area (biodiversity) is also lost including its wildlife.
- E) The Department proposes to remove 5.4 ha of habitat containing 903 trees and replace this with 2,709 trees only which doesn't actually replace the habitat.

3. Protected Vegetation loss:

- A) The site is within Koala Bushlands; In the SEQ Regional Plan is mapped as a Bioregional Biodiversity Corridor and as having Regional Biodiversity value; is mostly zoned Conservation; is an "Of Concern" regional ecosystem and mapped as a Essential Koala habitat area. These values constitute high ecological values and it is a vital part of Brisbane's & the SEQ Region's Natural Asset areas.
- B) Not just Koala habitat is proposed to be cleared. Potentially all wildlife and plants (biodiversity) would be removed, including potentially threatened species like Glossy Black Cockatoo, Grey-headed Flying Fox and other species identified on the site. The Atlas of Living Australia lists the following number of species

BKF DCDB + 50m Buffer		ATLAS OF LIVING AUSTRALIA				
All Precision		High Precision		All Precision		
All Since 1990	#spp.	All Since 1990	#spp.	All Time	#spp.	Incl
Insects	3	Insects	4	Insect	6	
Amphibians	2	Amphibians	1	Amphibians	16	Wallum Froglet
Birds	101	Birds	80	Birds	107	Glossy Black Cockatoo
Mammals	5	Mammals	4	Mammals	16	Grey Headed Flying Fox & Gliders
Reptiles	2	Reptiles	2	Reptiles	8	
Plants	120	Plants	31	Plants	142	Zieria furfuracea

- C) Species of National Significance. BCC has indicated that there are records of Greater Gliders being found in the adjacent BCC Prout Rd Park, as such the EPBC lists the adjacent forest as possible habitat. The Koala is also federally listed under the EPBC. There is no evidence that a referral under the EPBC was submitted.
- D) The Government's own supporting document acknowledges that vegetation removal will result in the complete loss of fauna habitat in the cleared area.

4. Consultation:

- A) Despite the sites known environmental values, the Department of Environment and Science was not fully included as a State Government stakeholder. The proposal clearly "affects an economic or environmental interest of the state".
- B) There is no evidence of Consultation with the Department of Environment and Science or the relevant sections of the Brisbane City Council.
- C) Despite being listed as a Stakeholder, there is no evidence of Consultation with Adjoining land owners, Surrounding residents or elected representatives during the design phase.

ADDITIONAL ISSUES OF CONCERN – What else is wrong with the proposal:

1. Need for new expanded Shotgun facility. There are at a number of existing shotgun ranges on site used for recreational and competition shooting events. The temporary facility built for the 2018 Commonwealth Games was constructed, including a north-south alignment, to meet international world class standards. But is there an economic case for this high level objective, when use of existing assets could be undertaken without additional clearing? What is the cost / benefit of the proposal to make the temporary facility permanent and to extend the facility?
2. What are the impacts from noise of shotguns operating from the proposed facility from 8 am to 9 pm, 5 days and possibly 7 days per week? The supporting document refers to “activities will be limited to socially acceptable times”. What are the “socially acceptable times”?
3. The shotgun curtain installed for the Commonwealth Games significantly reduced the distribution of shot. The curtain contained 100% of the shot during trap and down the line shooting events and 95% of shot during skeet events which appear to be a minor use. Why has the clearing footprint have to extend to overshoot areas for just 5% of deposited shot outside the protective shot curtain during skeet events? Do all wildlife and plants, including habitat trees, over 5.4 ha have to be removed? Why can't the proposed clearing be avoided?
4. It has been argued that maintaining the shotgun curtain for permanent deployment may incur substantial cost. Why should the environment bear the cost rather than maintaining the curtain permanently? Shooting with lead pellets should only be used during elite practice and elite events and the shotgun curtain could be erected during the use of lead shot for major competition events.
5. Community Consultation: Has this been adequate and best practice, as you would expect from an elected government of Queensland? Why are elected representatives, community members and other stakeholders having to get their information from us?
6. How is a sport facility for elite athletes considered to be of “community benefit” and “community health and well-being”?
7. If an impacting sport and recreation pursuit, like gun use, is to exist within a high quality natural area with multiple asset values, how can it continue to operate with no plan for the environmental values and management considerations, there of?
8. If active sport and recreation can co-exist within a natural area and its wildlife, where is the evidence and pro-active and sensitive management actions/plans to establish this claim?
9. Why has the State left itself to be accused of trying to bypass all its own and Council's protections and policies for the natural environment, by using an overriding policy like Ministerial Designation? This is usually used for essential infrastructure. How can another gun facility in a plethora of what appears to be uncoordinated shooting disciplines “Essential Infrastructure”?
10. There has been no assessment that the “Plans and development outcomes integrate and balance the economic, environmental and social needs of current and future generations in order to achieve ecological sustainability”.
11. Urban development has encroached and within a growing city is likely to continue. Balancing a core biodiversity area, an impacting sport and urban liveability is an issue that has to be addressed on this site as a long overdue planning priority

12. The site is located within the *South East Queensland Regional Plan 2017* (SEQ Regional Plan) area and is identified as a RLRPA (Regional Landscape and Rural Production Area). The intent of the RLRPA is to:

- x protect the values of this land from encroachment by urban and rural residential development
- x protect natural assets and regional landscapes, and ensure their sustainable use and management
- x support development and economic growth of rural communities and industries.

The clearing of protected regional ecosystems and habitat for Koalas, a vulnerable species, for the use of the site for elite athletes does not appear consistent with the intent.

13. The site is also identified in the SEQ Regional Plan has having

- a. regional biodiversity values
- b. forming part of bioregional wildlife corridor and
- c. regional scenic amenity values

The proposal makes no attempt to address these important values. The proposal to clear parts of the forest is contrary to the intents of those sections of the SEQ Regional Plan

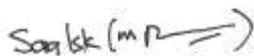
We acknowledge the existing facilities on site for recreational shooting in a number of disciplines and current informal protection of the existing vegetation and biodiversity values. However, there should not be further clearing and development of a Biodiversity Enhancement & Protection Plan to ensure the ongoing sustainable use of the site.

CONCLUSIONS:

- This proposal, in its current form, is opposed by our organisation and members.
- The potential to negotiate should be directly with the Minister.
- We believe the proposal is being given undue priority with an “essential infrastructure” designation. It is a commercial gun club facility, not a major essential road network, for instance.
- Public consultation is not of a high standard or best practice.
- The State Government is promoting the proposal like an urban developer – attempting to downgrade natural values, rush it through, provide a brief window for community submissions and misuse the calculations for implementing Offsets against its own guidelines.

For the above reasons and concerns we strongly oppose this proposed expansion of a shotgun range.

Yours sincerely,



Michael Petter
President B4C