

28<sup>th</sup> 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

### **SUBMISSION – Objection to proposal:**

#### **Proposed Ministerial Designation of land for infrastructure for CLAY TARGET RANGE AT BELMONT SHOOTING CENTRE**

The Bulimba Creek Catchment Coordinating Committee wishes to object to this Ministerial Designation.

The designation in its current form has failed to properly take into account the intents of the Federal EPBC Act, State Government Koala Policy, Offsets Policy and a range of regional interests outlined in the ShapingSEQ 2017 Regional Plan. The consultation on biodiversity issues has been wholly inadequate and the biodiversity assessments conducted have been flawed, cursory and inadequate.

We urge the Minister to reject this designation in its current form. If the Minister believes it is essential infrastructure the proposal should be re-scoped and rewritten to comply to ensure all relevant State and Regional interests are properly addressed and that adequate consultation, with stakeholders, including conservation organisations, is undertaken during its preparation.

This parcel of land is the vital northern section of the Koala Coast Corridor and the State Government should develop a Biodiversity Protection and Enhancement Plan to better define and strengthen its biodiversity protection. The forested portion of the parcel not in use for sporting activities should be declared a Nature Refuge under the Nature Conservation Act.

#### **Key Recommendations:**

1. Reject the applications in its current form and substantially revise the application to ensure minimal or no clearing and full offsets for habitat if clearing still occurs.
2. Develop a Biodiversity Protection & Enhancement Plan for the site, in consultation with DEHP, Brisbane City Council, community and local conservation groups. There is no current environmental plan in place for either biodiversity or environmental management for the entire site and its ecological sustainability and connectivity.
  - A) There are multiple layers of natural values, policies, mapping layers and protections.
  - B) Currently uncoordinated actions, including importing fill, unneeded (incl. barbed wire) internal fencing and vegetation clearing, are taking place that do not take into consideration of the natural values of the site, its habitat, connectivity and wildlife.
  - C) Lack of additional planning and other protection for the remaining ~340ha of forest including its connection to council acquisitions in MacKenzie, Prout Rd and Belmont Hills. No priorities for green infrastructure required to secure ecological connectivity such as wildlife movement solutions.

#### **Summary of Community Issues**

1. Proposal fails to justify the need to identify as “essential infrastructure” rather than deal with this expansion of the footprint as a normal Material Change of Use.
2. Existing shotgun facilities on site and the temporary facility built for the Commonwealth Games will meet current and foreseeable demand for public and international competitions.
3. Protected Vegetation – avoid or minimise clearing of Koala Habitat and listed communities of conservation significance. There appears little consideration at all in the proposal.
4. Offsets (for loss of Koala Habitat forest and protected Regional Ecosystem to be properly formulated to comply with Qld Environmental Offset Policy and Supported Infrastructure Koala Conservation Policy July 2017. Offsets should be a last resort.
5. Inadequate consultation with stakeholders and local community. There is no evidence of required collaboration with Dept of Environment and Science or Brisbane City Council in the planning stages of this proposal.

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6. Avoiding protected vegetation clearing: Shotgun curtain appears to contain 95% of lead shot. Minor skeet events contribute the 5% beyond the curtain. Why are trees to be removed with just a 5% issue with lead shot? This leads to 5.4ha of vegetation clearing.
7. This proposal highlights the vulnerability of the rest of the forested area to further expansion in the future.

## Summary of Planning issues

### Fauna Survey

Fauna surveys undertaken were inadequate “..only one site specific fauna survey has been undertaken (Lambert & Rehbein, 2016). The investigation (Lambert & Rehbein, 2016) included a small area approximately 210 m x 150 m, located at the northern end of the 300 m rifle range..”

Cursory examination of the Atlas of Living Australia revealed hundreds of species could occur in and around the site but the proponent found “..only two species – Cane Toad (*Rhinella marina*) and Common Brushtail Possum (*Trichosurus vulpecula*) observed during the spotlight surveys...”

Both information from club users and records from the Moggill Koala Hospital indicate the forest is inhabited by koalas. The fauna survey and assessment is manifestly inadequate.

### State and Regional Interests

The following state and regional interests have not been addressed by the current proposal

#### State Interests

##### Offsets & Infrastructure Policy

It fails to meet principles 1 to 7 of the “Queensland Environmental Offset Policy” sec 1.3

It fails to meet principles 1, 5 & 6 identified in the “State Government Supported Infrastructure Koala Conservation Policy July 2017”

The State offset calculator indicates that for 5ha of clearing 15ha of habitat has to be replaced to meet like for like criteria

#### Regional Interests

Its fails to address

Goal 3, Element 3, Strategy 6 regarding wildlife “threat reduction solutions.. where infrastructure intersect with the regional biodiversity network”.

Goal 4 Sustain - that “natural assets and regional landscapes are protected and nurtured”

Goal 4, Element 2: Biodiversity “The regional biodiversity network is protected and enhanced..”

Goal 4, Element 2, Strategy 1 “Protect regional biodiversity values and the ecological processes that support them, from inappropriate development”

Goal 4, Element 2, Strategy 2 “Maintain and enhance the value and connectivity of regional biodiversity corridors.”

Goal 4, Element 3: Koala conservation, Strategy 2 “Focus coordinated planning, with management and investment programs, to maintain and enhance the extent and quality of koala habitat..”

Goal 4, Element 7: Health and wellbeing, Strategy 3 “Protect areas that supply high levels of ecosystem services from inappropriate development and other irreversible impacts”.

Goal 4, Element 7, Strategy 4 “Ensure the community has adequate access to sport and recreation opportunities that use the region’s natural assets sustainably and do not compromise the region’s biodiversity values”.

B4C acknowledges the existing rifle range and its activities, but we are concerned with the impacts of new clearing and additional on-going noise from gunshots, 8am to 9pm 7 days a week. Urban development has encroached and, within a growing city, is likely to continue. Balancing a core biodiversity area, an impacting sport and urban liveability should be addressed on this site as a long overdue planning priority. Now is the time.

We trust that this submission will be given your due consideration.

Michael Petter (President)

**Attachment One** State & Regional Interest maps ; **Attachment Two** State & Regional Policy extracts; **Attachment Three** Species list from Atlas of Living Australia **Attachment Four** EPBC Matters Report **Attachment Five** Supplementary Information to Objection