

# SUBMISSION ON THE FUTURE OF THE BIRKDALE LAND, 362-388 OLD CLEVELAND ROAD EAST

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## Introduction

The Birkdale Land is indeed a once in a lifetime opportunity to protect the priceless ecological and historical values encompassed by this amazing site. Council is encouraging the community to “help shape a world-class asset for the Redlands Coast”. Unfortunately, many of the ideas presented on the “Imagine – Birkdale Community Precinct” part of the Redland City Council website, will effectively damage the very assets which make the site unique. Despite assurances that “the site has identified environmental cultural and historical significance, which will be protected”, some of the uses listed in Question 1 of the community consultation survey will irreparably damage many of the inherent values of the area.<sup>1</sup>

This submission will look at the environmental assets of the site and how they are best protected from possible damage; some of the consultants’ reports; perceived flaws in the consultation process; as well as presenting an alternative vision of the development of the site; and conclude with a summary list of recommendations.

## Environmental Assets

### Vegetation

1. Mature trees that belong to an endangered Regional Ecosystem (Scribbly Gums on basalt soils) which includes many favoured koala trees – an ideal place to spot koalas.
2. An elevated vantage point with views of Tingalpa Creek which also supports a large patch of wildflowers that have developed on the sandy soils that have broken down from the underlying sandstone formations.
3. Classic examples of the transition zone between marine and terrestrial ecosystems where salt intolerant species gradually give way to salt tolerant mangrove systems.
4. An expansive marine couch (*Sporobolus virginicus*) meadow. These areas are of great environmental significance as part of the marine vegetation complex.
5. A well-preserved river terrace that shows how rainfall has changed over geological time spans leaving traces of an earlier higher rainfall flood plain. Interestingly, this supports unmapped Regional Ecosystem species that have evolved on these old riverine deposits including the Gum-topped Box which is quite rare in the Redlands.
6. Distinctive zones of vegetation including Melaleuca Wetland species, Blue Gums and Scribbly gums.
7. Valuable areas of regrowth that will, in time, assume the status of remnant vegetation. These are important because they are natural regrowth, exhibiting the same species mix as in the adjacent Regional Ecosystems.

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<sup>1</sup> *Imagine* A place for connection & community – Survey RCC

The biggest threat to this vegetation is a change in the underground water. The site's groundwater, being in an estuarine area, is a delicate balance between freshwater and marine. There are likely to be underground reservoirs of fresh water given the presence of the sandstone in the geological mapping. There are many examples of how underground sandstone acts as a 'sponge' and supplies a reliable water flow, from local, (Greater Glider Reserve, incidentally on the same geological type as this part of the site) to those further afield such as Carnarvon Gorge.

The interface between freshwater and saltwater in estuarine areas is an incredibly delicate balance that is easily upset. Human interference with natural processes (such as changes in the topography by heavy earth moving machinery, drainage of an area or overuse of freshwater resources) can all lead to catastrophic changes in the vegetation, not only near the disturbance but further away as well – as far as the aquifer reaches. Saltwater incursion can lead to whole stands of trees being lost. Once this process begins it is very difficult, if not impossible to reverse.<sup>2</sup>

Some of the ideas presented on the Council website show large scale swimming pools and white-water rafting. This would involve large scale earth-moving and huge amounts of water. Questions need to be answered about where this water is going to come from. Chemicals required to keep the water healthy enough for human use would likely leach into the surrounding environment and eventually into the groundwater.

It is significant that the City Plan's Community Facilities Zone Code Performance Outcomes have pre-empted this problem. These are inconsistent with altering drainage patterns and earthworks:

#### **6.2.19.3 Community facilities zone code – Specific benchmarks for assessment**

##### **Table 6.2.19.3.1—Benchmarks for development that is accepted subject to requirements and assessable development**

###### **PO19**

*Development minimises impacts on the natural environment by:*

- (1) *minimising alteration of natural drainage patterns;*
- (2) *minimising earthworks;*
- (3) *avoiding any potential for release of contaminants; and maximising the retention of existing vegetation and ecological corridors.*

As well as major earthworks, many of the proposals would require the clearing of vegetation, both in the Conservation Area and the Community Facilities area. It would publicly damage the Council's credibility and reputation if they were not to follow their own guidelines.

## **Fauna**

Koalas are found on the site and have likely always had a consistent presence there. It is remarkable that koalas are scarcely mentioned on the *Imagine* website when they are one

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<sup>2</sup> 2009 Tularam, Gurudeo, Krishna, M., **Long term consequences of groundwater pumping in Australia: A review of impacts around the globe.** <https://research-repository.griffith.edu.au>

of the largest attractions to international tourist and local visitation. Both the Birkdale Site Opportunity Report (Urbis) and the Ecological Assessment Report (Cardno) recommend and depict koala corridors through the middle of the site. Many of the suggested uses will effectively block koala movement over the site (this is also at odds with the Commonwealth Conservation Agreement discussed below).

Two species of wallaby (red-necked and swamp) and the Eastern Grey Kangaroo were caught on camera traps during the Cardno survey. Four endangered or vulnerable fauna species that were either sighted or likely to be found, were mentioned in the Cardno Report. If all the cleared areas are developed, the macropods will lose their grazing land. There seems to be no consideration for these animals and their habitat requirements, in any of the suggested plans for the site.

## History (and Prehistory) of the site

There are many fascinating remnants of the history of the site including before the arrival of humans. One of the most interesting features of the site is the large flat area that rises from the marine couch meadow in the westernmost part of the site. This change in elevation of about five metres or more, according to the contours, forms a typical river terrace. These are formed when there is a decrease in rainfall over geological times where the old flood plain is left stranded and a new, lower plain is developed through normal erosion processes. Preserved river terraces are rare because they are usually the first place built on as they are useful, fertile flat land above present-day flood level. This area should be protected as it is a great example of the pre-history of the site and tells a fascinating story which should be part of the Historical Experience of the land. (See discussion below about the most likely Regional Ecosystem.)

There are also interesting artefact scatters that are indications of Indigenous use of the land. This area would presumably, have been highly sought after given its proximity to the abundant food supplies available in the creek and surrounds. The higher land would have provided a much valued living and meeting space. It would be surprising if middens were not to be found there. Hopefully more artefacts will be found over time to build a clearer picture of life along the creek.

The remains of the more recent history, the European farming of the land the WWII radio receiving station and other relics complete the picture of the history of the site. Some of these are protected under Queensland Heritage but there are many more deserving of protection such as the anchor points of the antennae supports. The large cleared square where the antennae were is also worthy of protection from any permanent construction.

## Consultants' Reports

### Ecological Assessment Report (Cardno)

This is a thorough report with the only slight difference of opinion being that they have recommended that the tree species found in the high ground in the west of the site would

fit in the Regional Ecosystem 12.5.7 whereas the suite of species found here, we feel are more accurately placed in the Endangered Regional Ecosystem 12.3.3d:

*12.3.3d: Eucalyptus moluccana woodland. Other frequently occurring species include Eucalyptus tereticornis, E. crebra, E. siderophloia, Corymbia citriodora subsp. variegata, Angophora leiocarpa and C. intermedia. Occurs on margins of Quaternary alluvial plains often adjacent sedimentary geologies. **May also occur on stranded Pleistocene river terraces.** Floodplain (other than floodplain wetlands).<sup>3</sup>*

The Cardno Report also recognises the value of land within the Community Facilities Zone:

*Ecological values are reflected within the suggested Conservation Area Boundary, however it should be noted, vegetation within the Community facilities zone is dominated by open grassland. Ecological values in this area should be addressed when further uses are considered for the area. Ecological assessment of this area would ideally be conducted to inform design of future uses and environmentally sensitive planning. This may include consideration of the importance of individual trees and the role open grassland plays in supporting local populations of macropods.<sup>4</sup>*

This report quotes from the agreement between the Commonwealth and the Council as part of the conditions of sale whereby the Commonwealth entered into a Conservation Agreement with Council. This makes it clear how important the management of the site is to conserve koalas:

The Conservation Agreement states that in developing a management plan for the Site that Council must:

*(a) Protect, manage and improve over time the quality of Koala habitat, including the ongoing recruitment of Koala feed trees, and Subtropical and Temperate Coastal Saltmarsh ecological community.*

And

*(c) Retain, as best possible, all native trees, shrubs and undergrowth to provide movement opportunities for native fauna including the Koala.*

And

*(g) Ensure that any development proposed on the land is sensitive to the protection and management of the fauna including Koala (and Koala habitat) within the Conservation Area; and that it does not restrict movement to and from the site.<sup>5</sup>*

This agreement makes it clear that the effect of development on the Community Facilities part of the site can impact on the Conservation Area and there is no justification for Council to suggest that by protecting Conservation Areas their obligations are satisfied and the rest of the site is open to any type of development. All of the Birkdale site is referred to regarding movement across the site and thus subject to clauses (c) and (g).

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<sup>3</sup> 2020 Qld Department Environment and Science. Regional Ecosystems Descriptions

<sup>4</sup> 18<sup>th</sup> June 2020. *Ecological Assessment Report*. Cardno (Qld) Pty Ltd Page 23.

<sup>5</sup> 18<sup>th</sup> June 2020. *Ecological Assessment Report*. Cardno (Qld) Pty Ltd. Appendix B Environmental Management Plan Page 1

The Cardno Report also comments on the shortcomings of the investigation including the small time frame for ecological investigations (only three days in some cases) and states that more work needs to be done:

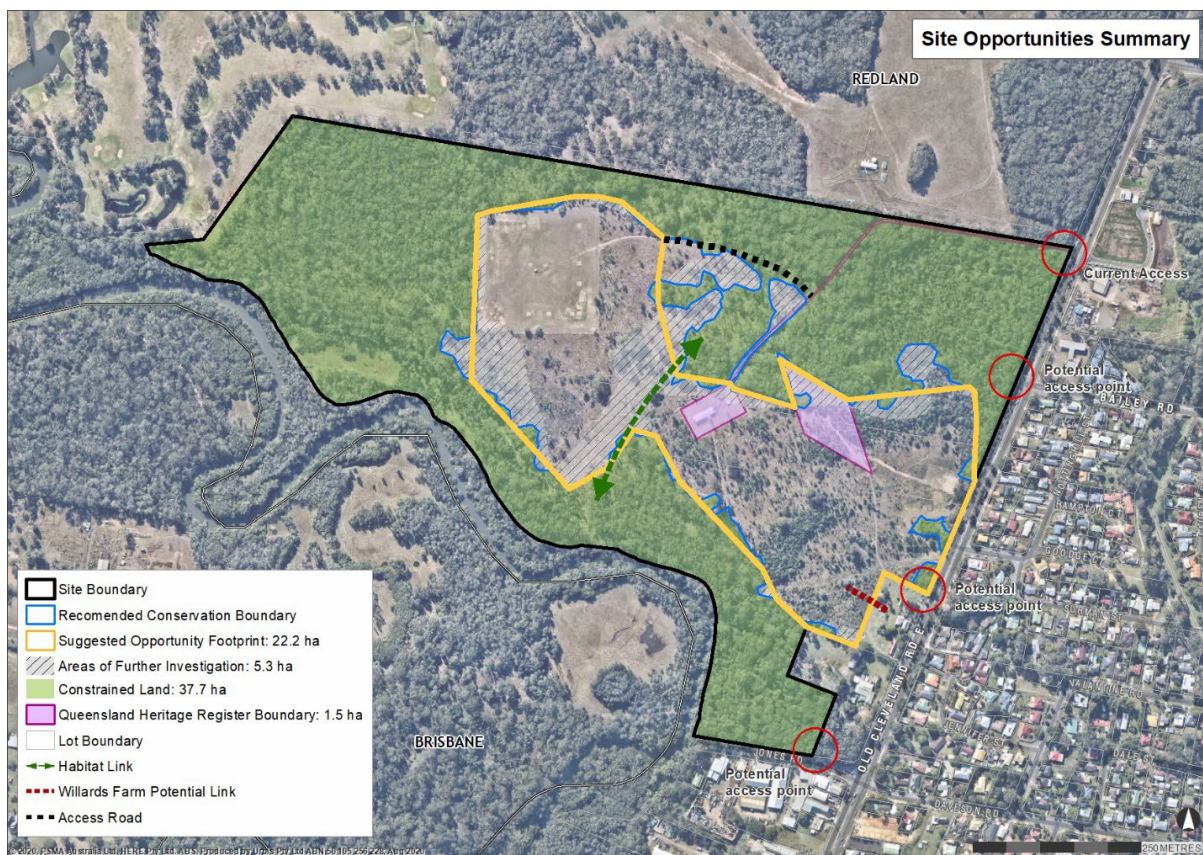
### Further Studies

*The current study provides an overview of ecological values within the Study Area and primarily focusses on MNES. More detailed investigations are likely to reveal significantly more information regarding the ecological values of the Study Area and information to aid in its management. Further investigations would ideally include:*

- *The current study identified potential errors in the regional ecosystem mapping. Further investigations are likely to reveal:*
  - *A change in regional ecosystem framework land zone boundaries.*
  - *Additional regional ecosystems not presently mapped.*
  - *Refinement of heterogeneous polygons.*
  - *Potential elevation of some areas within the suggested Conservation Area currently not mapped in the regulated vegetation mapping to a remnant status.<sup>6</sup>*

### Birkdale Site Opportunity Report (Urbis)

This report also suggests that the uses of the whole site are limited by the potential impacts on the Conservation Area and suggests a new development footprint (marked by a yellow line) (copied below):



<sup>6</sup> 18<sup>th</sup> June 2020. *Ecological Assessment Report*. Cardno (Qld) Pty Ltd Page 23.

Note that the hatched areas are recommended for further investigation and when updated may well justify their being added to what they call “Constrained Land”. The dotted habitat link through the centre of the footprint is also clearly marked.

The Urbis Report also mentions the constraint of the Commonwealth Agreement (see above in Cardno Report).

## **Community Consultation**

### **The Redland City Council Website “Imagine. Birkdale Community Precinct”**

While packed with many good ideas and information some of the artists’ impressions look more like a theme park or sideshow alley. The website does mislead viewers as to what is possible on the Birkdale Land. For example, the leading statement in Fact Sheet 1.:

*Imagine a place where families and individuals could come to play, swim, cycle and connect with others – water play, adventure sports, walking and cycling trails, picnic areas, perhaps paddock-to-plate or other ventures.*

There is nothing about enjoying the natural assets and the unique flora and fauna! There has already been discussion above about the dangers of large-scale disturbance of the site which would follow from many of these uses and cause saltwater intrusion which is potentially capable of damaging the whole site, including the conservation area.

*Birkdale Community Precinct, at almost 10 times the size of the Gabba precinct, has plenty of room for many exciting projects.*

The Gabba site is actually very small so it is hardly a convincing comparison. There is no information given about the constraints on the Birkdale site and the false impression is created that all 62 hectares are open for development. According to the Cardno Report, only about 22 hectares is available and some of that is constrained.

### **Imagine – the Survey**

The paper copy of the survey includes some of the most leading questions and confusing ranking imaginable. The over-riding statement that the site’s identified environmental, cultural and historical significance will be protected (highly debatable, given the information in the consultants’ reports) is tantamount to telling people ‘not to worry’ about protecting these assets making them less likely to rank them highly (because they think these areas are already being protected!).

Question 1 is a grab bag of activities likely to appeal to a small number of the community, many of which are not appropriate or even possible on this site. It is galling that respondents cannot agree with walking tracks without also accepting cycling on these tracks.



Question 2. When asked to “Please rank on a scale of 1-5 the importance to you of the following values identified at Birkdale Community Precinct” it is most likely that most people will go ahead and mark their preferences, using 1 for the most important and 5 as the least important. Few would read the small print which tells them the opposite. The next statement is an appalling attempt to influence the answers, quieting the misgivings some may have about how the site is going to fit all these things in and to once again, ‘not worry’ about the environmental and heritage values as they are already protected.

*Remember, there is ample space available to accommodate numerous projects and ideas and the site’s environmental and heritage values will be protected whatever is decided for the site.*

Question 3 has the same flaw as Question 2 and virtually invalidates the results of this paper-based survey.

On the online survey it is a little easier to see the correct way to rank the importance values but it still contains the misleading sentence quoted above.

## **Alternative Vision**

KAG would like to see on the Birkdale Land: a centre of excellence for the environment that truly builds on the uniqueness of the Redlands; a centre that proudly shows its commitment to the protection of koala habitat and is rewarded by increasing numbers of koalas that are easily seen in their natural environment. This will encourage visitation by locals and tourists, both international and Australia-wide; a centre that proudly shows its connection to the land and its formation dating from 2 million years ago to the present; a centre that proudly shows its connection to Indigenous people from 60,000 years ago to the present; a centre that also links us to our early farming history showing how the practices have changed over the years and even more recently the story of the World War II use of the land.

KAG approves of many of the ideas depicted in the suggestions for the Birkdale Land that are sensitive and low impact: carefully placed and constructed walking tracks that lead the visitor to the main attractions of the site from the restored Willards Farmhouse to the Radio Receiving Station (which would be an ideal place for an historical museum describing the role the station played in WWII); on to the natural lagoons formed along the flowpath from the underground springs – carefully restored using natural vegetation; on to the peaceful walk along the creek with the wildflowers in bloom and the views of the creek; then along the mangrove fringe and up onto the River Terrace to marvel about its formation and rare trees; and also to see the remains of the wartime communication systems and the magnificent melaleuca wetlands.

We do not need to build Disneyland or any other white elephants on this site – its attractions are already there! We do not need to build artificial rapids or pools that would be so expensive and destructive to build and an absolute nightmare to maintain. We do not need bikes flying past and endangering walkers – we want people to walk slowly and thoughtfully to actually see what is in front of them – not flashing past to get to somewhere else – we already have bike tracks elsewhere for that. Adventure sports have no connection



with this special piece of land. They would seriously detract from its intrinsic values and cheapen the experience for visitors. We do not need 'glamping' tents that would impinge on the relatively small Conservation Area and create sewage and litter problems. This is not the middle of the bush, there are plenty of accommodation options nearby (or will be if the demand grows for them!)

Anyone who travels widely would know that the best attractions are whatever makes the local area distinctive - they do not want to see second-rate copies of other attractions found elsewhere. The most successful tourist attractions are those that celebrate the uniqueness of an area such as Kings Canyon north of Uluru. The interpretive signage there is extremely well done, especially the descriptions of how the landforms developed. There is a great opportunity for guided tours on the Birkdale Land, too. These would be led by those knowledgeable about Indigenous culture; mangrove ecosystems; birdlife and other fauna; geology and landforms; trees and native plants. There could be a charge for this and other services, giving employment to local people. Most visitors would happily pay an entrance fee if they knew it was to help maintain the site and provide an enhanced experience.

## RECOMMENDATIONS

1. As a matter of urgency, thorough hydrological investigations should be completed and competently analysed to present the risks to the ecology of the site by interference of the groundwater. The precautionary principle would sensibly dictate that there be no major excavations or drawing down of the aquifer owing to the future need to maintain a bulwark of positive pressure against saltwater intrusion consistent with the predicted sea level rise.
2. The recommendations in the council commissioned reports (including the Urbis Report, Preliminary Engineering Report and the Ecology Report) indicate that there are needs for further studies. The Queensland Herbarium should be approached for reappraisal of the Regional Ecosystems regarding the vegetation on the river terrace and the missing 'hole' in the north western part of the site. These should be carried out before any decisions affecting the future of the Birkdale Land are made.
3. The full text of the agreement between the Commonwealth of Australia and Redlands City Council should be publicly released so a more realistic view of what is possible on the land is possible. This should have occurred before public consultation in a spirit of openness and accountability.
4. The Birkdale Land is an absolute gem and should be protected, enhanced and shared in ways that do not cause its degradation. We have, as the decision-makers, a profound responsibility to hand this land over to following generations in a better condition than we have received it.

Yours sincerely,

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