

**Koala Action Group Qld Inc**  
**PO Box 660**  
**Capalaba Qld 4157**  
**ABN 85 618 891 610**  
**www.koalagroup.asn.au**

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29 August 2025

Department of State Development, Infrastructure and Planning  
1 William Street  
Brisbane 4000

By email: [infrastructuredesignation@dasilgp.qld.gov.au](mailto:infrastructuredesignation@dasilgp.qld.gov.au)

**Submission on Ormiston College Proposed Expansion (MID-0425-0938)**

Dear sir/madam,

**Introduction**

The Koala Action Group Qld Inc (KAG) has worked for more than 35 years to protect and restore koala habitat in the Redlands. Over this time, we have planted more than 100,000 trees in partnership with Redland City Council, assisted with koala rescues and scientific surveys, and delivered extensive public awareness programs. Our group has accumulated significant knowledge of koala habitat use and the importance of maintaining ecological connectivity in the region.

We are extremely concerned about the proposal by Ormiston College to clear core koala habitat, including for three new sports fields, on land at 168–180 Delancey Street, Ormiston. The proposal represents a serious threat to the survival of the Endangered Koala (*Phascolarctos cinereus*) and undermines both state and national conservation objectives.

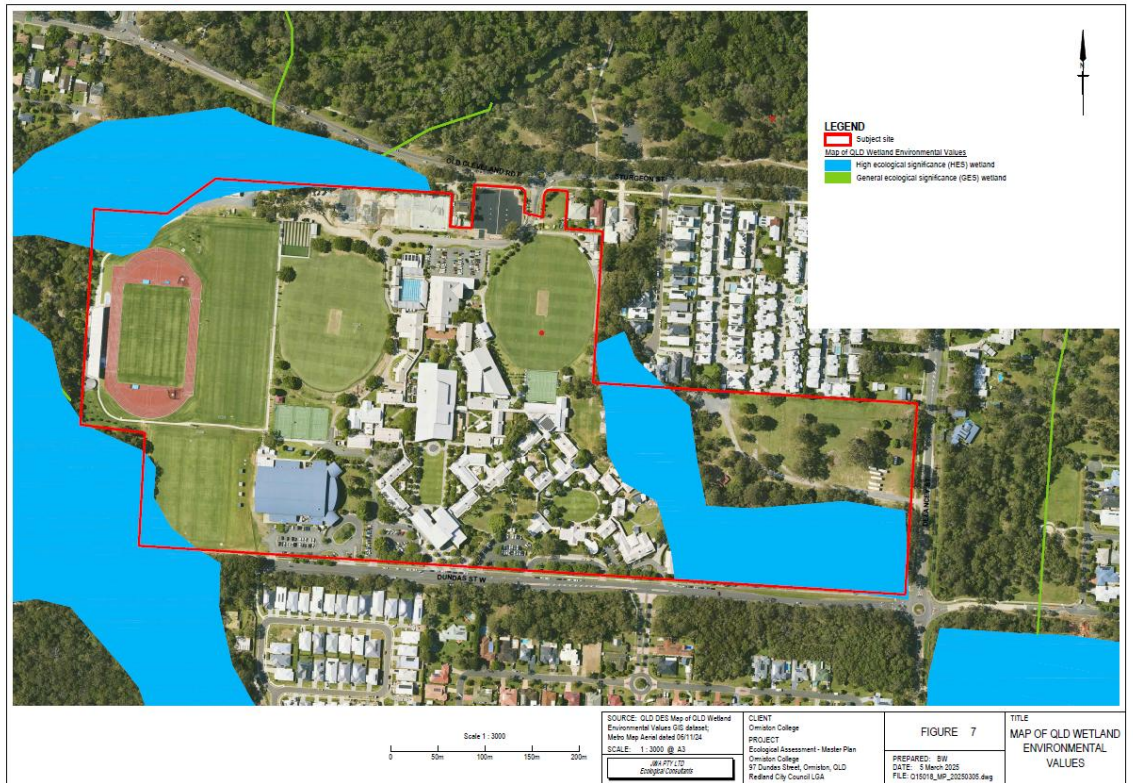
**Environmental Concerns**

The proposed clearing will result in the removal of an estimated 562 non-juvenile koala habitat trees, including many mature *Eucalyptus tereticornis*, one of the koala's most important food species. This habitat is of exceptionally high quality, providing both foraging and shelter resources, and it forms part of an area mapped as Matters of State Environmental Significance and wetland. The trees are sustained by soil moisture that enables them to remain productive even during drought, which makes the site particularly valuable as a climate refuge.

A short visit to the site on 21st July 2025, showed exceptional habitat values with the preferred koala food species in the area, *Eucalyptus tereticornis*, in incredible abundance, interspersed with the other koala habitat trees *Melaleuca quinquenervia* and *Lophostemon suaveolens*. The latter two species are especially important shelter trees in hot summers. The *Eucalyptus tereticornis* present range from huge trees likely to be hundreds of years old, large and medium sized trees, saplings and seedlings.

In KAG's opinion it would be difficult to find better quality habitat anywhere. The vegetated area is mapped by the Redland City Council (RCC) as wetland with a small part covered by the flood overlay with the rest close to this flood overlay. The soil moisture undoubtedly contributes to the health of these trees and helps sustain good growth during dry times (see map below) which shows the state mapped High ecological significance wetlands.

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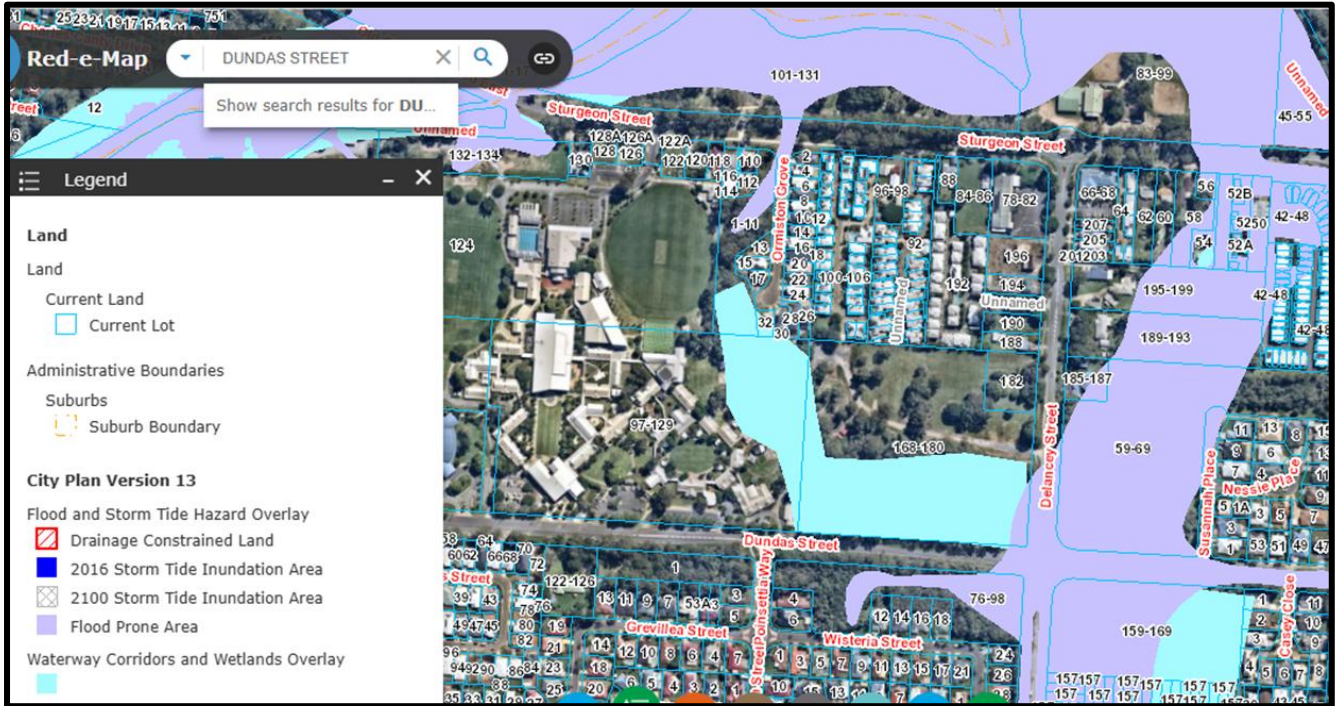
**Photo of koala habitat taken from Delancey St**



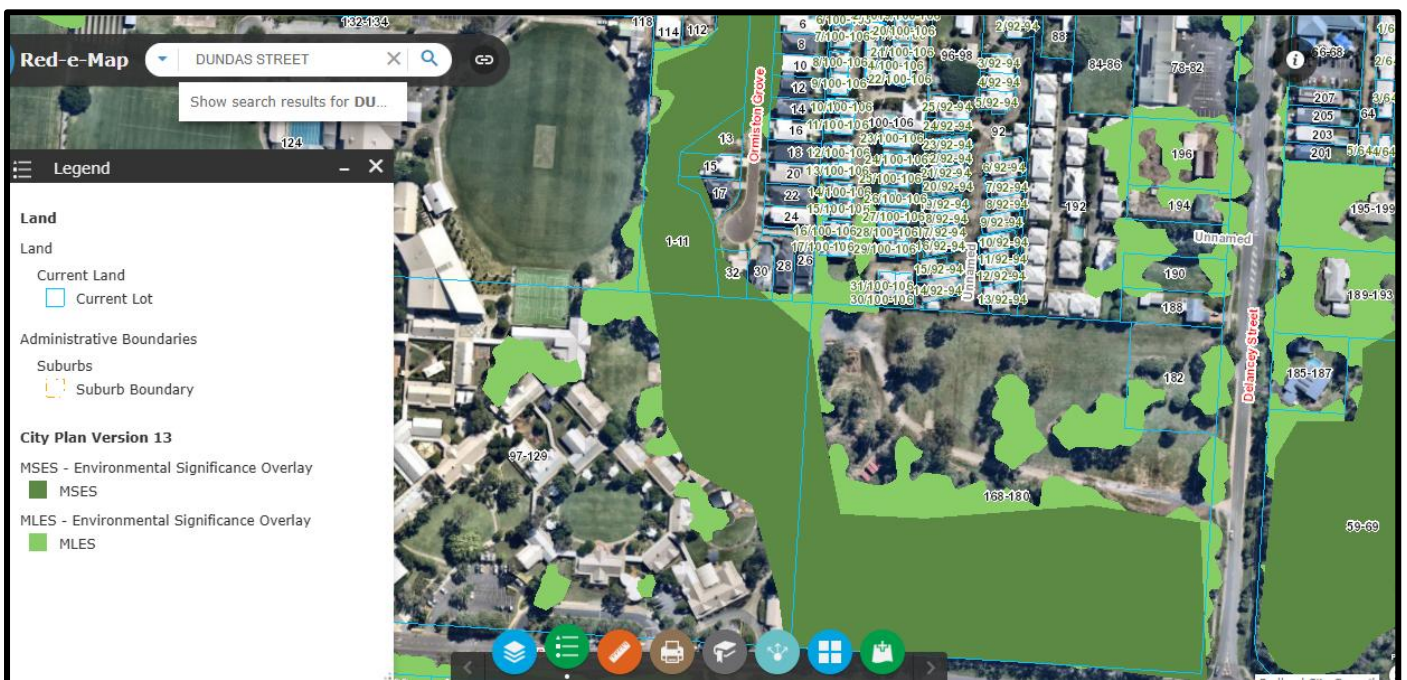
**Phone/Fax 07 3823 5575**

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From Red-e-map (RCC website) showing flood prone land and wetlands overlay



From Red-e-map (RCC website) showing MSES (core koala habitat) and MLES (Significant koala habitat)



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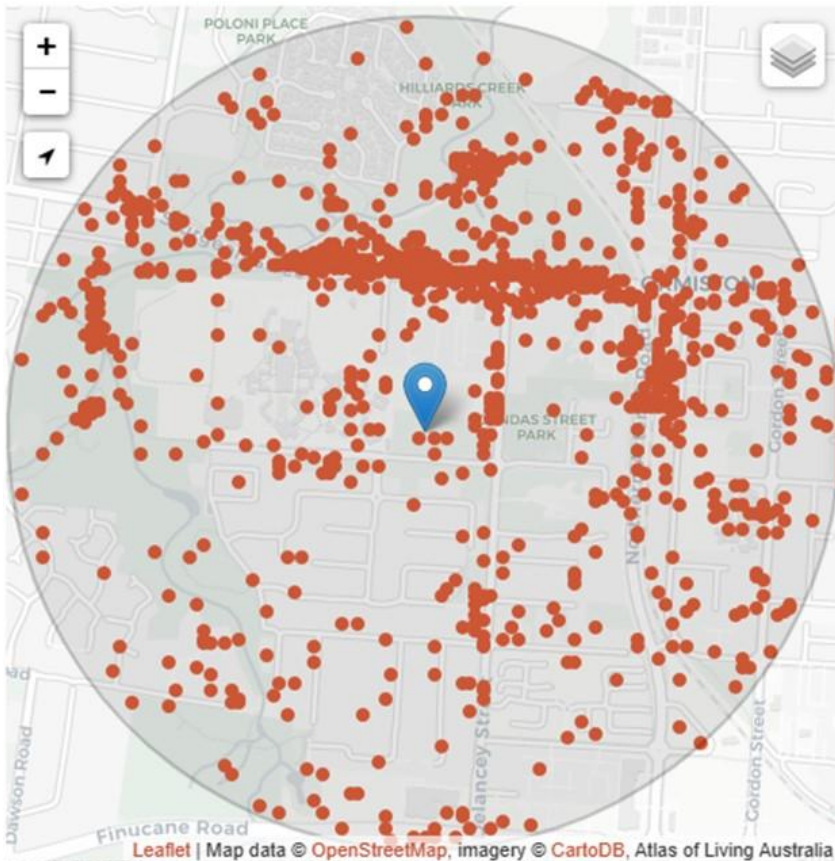
The area also plays a critical role in maintaining habitat connectivity. It forms part of a wildlife corridor linked to the Hilliards Creek system. If cleared, the corridor width will be reduced from over 100 metres to as little as 30 metres, far below the minimum width of 100–300 metres recommended under the EPBC Act Koala Referral Guidelines. Such fragmentation would isolate habitat patches and increase mortality from vehicle strikes and dog attacks.

### **Deficiencies in the Ecological Assessment**

The ecological report prepared for Ormiston College (JWA, 2025) contains significant flaws and inconsistencies. It relies heavily on the Spot Assessment Technique, which is not appropriate for small, dense urban habitat patches. The method is known to underestimate koala use in areas where dense vegetation and high soil moisture make scat detection difficult. The report also fails to adequately consider local data, including numerous koala sightings recorded by residents and in the Koala Watch database, as well as recent field observations by KAG members confirming koala presence on the site.

The report further confuses the assessment of habitat tree removal, with contradictory figures and a lack of clarity around the actual number of trees to be lost. It dismisses the importance of large individual trees and stepping-stone habitat, despite recent federal conservation advice highlighting their critical role in supporting koala movement and survival. More reliable survey methods, such as the use of detection dogs or drone surveys, were not employed, leading to an incomplete and misleading assessment.

### **From Atlas of Living Australia (ALA). Koala sightings within a one kilometre radius of the site**



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As areas within the vegetated area are not visible from outside the private property, it is to be expected that koala sightings on the Ormiston College site would be minimal except around the edges. Overall sightings are predominantly along roadways and footpaths where people walk regularly. However, the above ALA map does show the frequency of sightings in the immediate area (total of 1945).

### **Importance of the Local Population**

The Koala Coast population has declined by approximately 80 per cent since the 1990s and has been formally listed as Endangered. The loss of remaining high-quality habitat in Ormiston would further accelerate this decline. Scientific studies have demonstrated that urban koala populations play a vital role in sustaining nearby bushland populations, and the loss of habitat in urban settings such as this cannot be offset elsewhere.

The community also places immense social, cultural and economic value on koalas. RCC has invested heavily in koala awareness programs, research partnerships, and initiatives such as the Koala Conservation Action Plan and Koala Safe Neighbourhoods, the first of which was established in Ormiston in 2018. The clearing of core habitat beside such a program undermines both community trust and conservation outcomes.

### **Additional Environmental Risks**

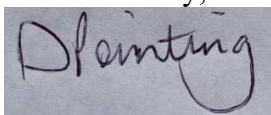
The proposed development will also introduce other risks to the local environment. Construction on low-lying, flood-prone land may require significant fill, further disrupting natural hydrology and adversely affecting adjacent wetlands and tree health. The claim of “no net loss” through revegetation is misleading, as newly planted trees will take decades to replace the ecological values of the mature habitat to be removed. During this time, the local koala population will suffer significant decline.

### **Conclusion**

Our group strongly opposes the proposed Ministerial Infrastructure Designation in its current form. We respectfully request that the Queensland Government refuse the proposal due to its unacceptable impacts on the Endangered Koala. We further request that the Government require an independent, comprehensive ecological assessment using best-practice survey methods, and that any future development ensures the protection of existing corridors and retention of all remaining high-value koala habitat.

We urge the Government to encourage Ormiston College to explore alternative options, such as shared sporting facilities, that avoid unnecessary clearing and preserve the unique ecological values of the site. The proposed expansion of Ormiston College will cause the destruction of critical koala habitat, fragmentation of a major corridor, and a long-term decline in the already endangered local population. The ecological report provided by the proponent is flawed and does not accurately reflect the significance of the site for koala conservation.

Yours sincerely,



Debbie Pointing - President  
Koala Action Group Qld Inc-Redlands