

The Assessment Manager  
Redland City Council

[rcc@redland.qld.gov.au](mailto:rcc@redland.qld.gov.au)

cc [Jasmine.Clissold@redland.qld.gov.au](mailto:Jasmine.Clissold@redland.qld.gov.au)

RE: Kinross Road [RAL24/0054](#) (which has been advertised for public consultation )

The Koala Action Group has grave concerns about the proposal and thank you for the opportunity to comment.

Our concerns are as follows:

### Significant clearing of koala habitat trees

It is impossible to judge the impact on the Endangered Koala without a complete fauna assessment of the effects of the clearing of up to 456 Koala Habitat trees. The loss of so many koala habitat trees is highly significant to the local koala population.

The tree plot lacks credibility with so many 'unknown' species listed and no consistency with botanical names. There is no information about koala usage of the trees to be removed, especially the isolated trees. At the very least, signs of koala such as scratches and scats should have been recorded.

It is very likely that the isolated trees in an area which the proponents dismiss as "devoid of koala habitat" perform an important function as 'stepping stone' trees. The importance of isolated paddock trees has been revealed by many recent studies (for example, ANU 2021. "A review of koala habitat assessment criteria and methods" and Barth et al. 2020 "Scattered paddock trees and roadside vegetation can provide important habitat for koalas".)

The figures in the table below (page 5 of Information Response - Ecology 26-52 Kinross Road Thornlands), do not add up: the total number of koala habitat trees is said to be 534 but when retained trees + removed trees + to be confirmed trees are added up it comes to 531. (78+218+235=531). Three koala habitat trees have been lost! These small errors cause the loss of credibility and places all the figures supplied in doubt.

**Table 2. Summary of Tree Outcome**

	<b>Total</b>	<b>Retained</b>	<b>Removed</b>	<b>To be Confirmed</b>
ALL Trees	611	84	253	274
Weed Trees	20		20	
Koala Habitat Trees	534	78	218	235
Significant Trees (DBH>500, or habitat)	65	7	25	33

However, in any case, the undisputed loss of up to 456 (534 minus 78) koala habitat trees is going to have a major impact on the local koala population.

## Blocking of the significant East-West Koala Corridor

Hilliards Creek is one of the most important Koala Habitat Areas in the Redlands. Being able to reach this habitat area is vital for koala dispersal and breeding purposes. (See figure below).

**Figure 1. Core Koala Habitat areas (from Red-e-Map RCC)**

Orange outline – approximate position of subject site. Purple line – likely koala movement path



The koala mapping above shows how important the connecting areas are between Hilliards Creek habitat and the large area of core koala habitat on Panorama Drive.

This northern linkage must not be reduced in size as 100 metres is generally accepted as minimum useful corridor to contain koala habitat trees. The edge effects of a 50-metre corridor buffer going through a heavily urbanised area with grassed areas for bushfire protection are profound and the potential for falling branches makes it difficult for it to contain full sized koala habitat trees.

We find the argument that the corridor has been compromised to the east (which somehow justifies its narrowing in the application area) is quite false. The corridor to the north-east measures up to 200 metres in width and is an average of well over 100 metres. There is a pinch point of 60 metres but this is only of short duration and is constrained only by fauna friendly Environmental Management properties. The example of narrowed corridor given in the information response is just a small offshoot of the main corridor.

Similarly, the assertion by Gondwana Ecologists that the revegetated area along the east-west corridor is the same whether the 15 allotments are there or not makes no sense. There is no reason to have 40 metres of mown grass when the bushfire risk is complied with by just 11 metres. Surely the housing proposed there would mean increasing the grassed buffer rather than the reverse as they claim.

The application consistently relies on faulty assumptions of what is considered koala habitat:

*The majority of the development is in the area devoid of koala habitat while the area of koala habitat (in the west) is retained and dedicated to Council. (Information Response - Ecology 26-52 Kinross Road Thornlands - Gondwana Ecology Group.)*

There is a multitude of recent studies that point to the importance of scattered trees as part of the habitat matrix of koalas (as quoted above). These sources and others, point out the usefulness of ‘stepping stone’ trees in an urban situation. Movement of koalas is along the ground and open grassland does not present an impediment as houses and fences do.

The proponents do not seem to realise the consequences of blocking the east-west movement of koalas. It is a small compensation for blocking movement with housing to leave a 100-metre movement path. To diminish this in any way is unthinkable. This lack of understanding is made clear by the way they address Schedule 11 (Koala Broad Hectare Area) in their response to ecological issues:

**Table 1 Schedule 11 Koala Broad Hectare Area**

Benchmark	Project Outcome
a) the development provides, on the premises, the safe koala movement measures necessary to maximise the safe movement of koalas <b>within and through the premises</b>	<b>Complies</b> The subject land is for the most part devoid of koala habitat and is not part of an area that would be considered to provide koala passage. <b>The development does not fragment any corridors</b> , and no new roads are proposed across any corridor areas. Koala movement in the landscape will be maintained through the vegetated parts of the land in the west and south and enhanced <b>to some degree in the north as part of an open space connection between the west and east.</b>

The benchmark for Schedule 11 above, makes it clear that the schedule addresses connectivity *within the development* (green highlight). The proponent’s response is to wrongly claim that the development does not fragment any corridors when the important east-west corridor is almost totally blocked.

After development, koalas from surrounding habitat areas will continue to attempt to access the Hilliards Creek habitat and will be lost in the maze of small lot housing. It is unlikely that they will be able to find the narrow east-west corridor proposed. A wide, revegetated, 100 metre corridor (as shown in the Kinross Road Structure Plan) will increase their chances of successfully negotiating this difficult area.

This width is supported by many references in the Redlands City Planning Scheme (Version 14).

For example:

#### 8.2.4.3 Environmental significance overlay code – Specific benchmarks for assessment

<b>PO 14</b> Corridors have sufficient width to maintain viable wildlife or habitat linkages.	<b>AO14.1</b> Ecological corridors have a minimum width of 100m.
--	---

There is no consideration of koala movement “within and through the premises”. Some thought should be given to the kinds of street trees and whether they can provide shelter for koalas passing through.

### Unnecessary dewatering and filling of western dam

There is a strong likelihood of disturbance of existing vegetation with the proposed dewatering of the dam in the Hilliards Creek Core Koala Habitat. Changes in water table are likely to put mature trees at risk as older trees do not adapt well to such changes. It would be far better to work with the natural topography and to add water retention basins that will flow into the dam. We notice that this contingency was thought of when the Kinross Road Structure Plan was endorsed. In discussing the Greenspace Network is found the following:

(d) protect remnant and nonremnant vegetation, cleared areas and *artificial wetlands* that contribute to local habitat and movement of fauna

and (b) protect the hydraulic and ecological functions of the Hilliards Creek waterway, its tributaries, drainage lines and flood prone land;

We request that it this is adhered to in this situation. We note that the Council’s Information Request asked for an assessment for this waterbody. Hopefully, this will show there is no valid reason for filling this dam.

### Safe fauna crossing

A safe fauna crossing is prominently marked on Kinross Road in the road movement network plans in the Redlands Planning Scheme. The developers should be made to implement this fauna crossing (including koala exclusion fencing) as part of their roadworks to access their development which is going to substantially increase the traffic.

### Landscaping

The Landscaping Plan does not give confidence that it will result in an ecologically sensitive development. Many of the plants mentioned are stock standard native cultivars that are used

in developments anywhere in the Brisbane / Ipswich area and are not found locally. Locally indigenous plants should be chosen to be used so close to an important creek such as the Hilliards Creek. The Kauri Pine is not found locally and *Hymenosporum flavum* (native frangipani) is not a feature of local eucalypt forests. This species becomes a pest in rehabilitation plantings as it too readily seeds and the seeds disperse too widely. Where it has been used in local revegetation projects, it has led to a monoculture at the expense of local plants.

## Concluding remarks

No serious consideration seems to have been given to whether the impact on koalas should be considered for EPBC Act assessment. Many pages of irrelevant information have been used to give the impression there was a genuine consideration of the impacts on listed species with the most prominent endangered animal, the koala not seriously discussed. If this proposal is not referred, with the loss of so many koala trees and blocking of an important corridor, our group will consider sending in a third-party referral.

There is absolutely no justification for placing housing in an Open Space corridor. This was an essential part of the fauna movement corridor in the Kinross Road Structure Plan which was open for public submissions, endorsed by council in 2012 and carried through to the most recent Planning Scheme. Removal of part of this corridor which is such a feature of the zoning plan would cause a serious loss of trust in the community's faith in the planning process.

Yours sincerely,

Lynn Roberts BSc (AES)

Vice-president KAG