# DEPARTMENT OF THE ENVIRONMENT AND ENERGY

**To:** James Barker, Assistant Secretary, Assessments and Governance Branch (for decision)

**Statement of Reasons for decision on referral and assessment approach—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland, (EPBC 2017/8134)**

**Timing:** Statutory timeframe is 9 August 2018.

**Recommendations:**

1. Consider the table at Attachment D outlining the referral decision brief and attachments recommended to form your statement of reasons.

**Considered / Please discuss**

2. Agree that the referral decision brief at Attachment C reflects your reasoning in making your decision under section 75 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) that the proposed action is a controlled action and your decision under section 87 on the approach for assessing the relevant impacts of the proposed action.

**Agreed / Not agreed**

3. If you agree to Recommendation 2, sign the letters to the Coomera Conservation Group and Polaris Coomera Pty Ltd (Attachment B) providing the document at Attachment C.

**Signed / Not signed**

**James Barker**
**Assistant Secretary**
**Assessments and Governance Branch**

**Date:** 6/8/18

**Comments:**

**Key Points:**

1. Polaris Coomera Pty Ltd proposes to develop a residential master planned community at Coomera, approximately 20 km north of the Gold Coast, Queensland (proposed action).
2. On 5 July 2018, you determined, under section 75 of the EPBC Act, that the proposed action is a controlled action for likely significant impacts on listed threatened species and communities (sections 18 and 18A of the EPBC Act). On the same day you also determined, under section 87 of the EPBC Act, that the proposed action would be assessed by preliminary documentation under Division 4, Part 8 of the EPBC Act.
3. On 12 July 2018, the Department received a request from the Coomera Conservation Group for a statement of reasons for your controlled action decision (Attachment A).

4. On 17 July 2018, the Department received a request from Polaris Coomera Pty Ltd for a statement of reasons for your controlled action decision and your decision on the assessment approach (Attachment A).
5. The timeframe for providing a statement of reasons is 28 days from receipt of a request. For the request received on 12 July 2018, the due date is 9 August 2018.
6. The Department recommends that you provide covering letters (Attachment B) along with the referral decision brief (Attachment C) as your statement of reasons for your controlled action decision and your decision on the assessment approach.
7. The Department has outlined which attachments of the referral decision brief were relevant to your decisions and should form part of your statement of reasons at Attachment D.

s22
Director
Queensland South and Sea Dumping Section
Assessments and Governance Branch
T: (02) 6274 s22
3 / 8 / 2018

Assessment officer: s22
Queensland South and Sea Dumping Section
T: (07) 3837 s22

**ATTACHMENTS**

A: Requests for a statement of reasons (dated 12 and 17 July 2018)

B: Cover letters – FOR SIGNATURE

C: Referral decision brief for provision as the statement of reasons

D: Table of documents attached to the referral decision brief

**Polaris Coomera Pty. Ltd.**
Planning and Development

17 July 2018

Mr James Barker
Assistant Secretary
Assessments and Governance Branch
Department of the environment and Energy

By Email: james.barker@environment.gov.au

Dear James

**Request for Statement of Reasons – decision on referral that master planned residential development is a controlled action and approach for assessment**

We recently received your decision that the proposed Coomera Woods Master Planned Development located at 49 and 51 George Alexander Way, Coomera, on the Gold Coast in Queensland is a controlled action (provided to Polaris by letter dated 05 July 2018 (EPBC Ref: 2017/8134).

We request that you kindly provide a written statement of reasons in accordance with subsection 77(4) of the Environment Protection and Biodiversity Conservation Act 1999 , in relation to your decision under s.75 of the Act that the proposed action for the development of Coomera Woods is a controlled action. We also request that you provide a statement of reasons in accordance with s.13 of the Administrative Decisions (Judicial Review) Act 1977 with respect to your decision regarding the approach for assessment regarding the proposed action.

Yours faithfully

Kaeko Omura
Managing Director
Polaris Coomera Pty Ltd

**Polaris Coomera Pty Ltd**
Level 4, 9 Beach Road / PO Box 105, Surfers Paradise QLD 4217
TEL: (07) 5592 5890 FAX: (07) 5526 2574
ACN: 130 648 056 ABN: 36 130 648 056

EPBC Ref: 2017/8134

Kaeko Omura
Managing Director
Polaris Coomera Pty Ltd
PO Box 105
SURFERS PARADISE QLD 4217

Dear Kaeko Omura

**Statement of Reasons for decision on referral and assessment approach—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland**

I am writing in response to your request, received on 17 July 2018, for a statement of reasons for my decision that your proposed action to develop a residential master planned community in Coomera, approximately 20 km north of the Gold Coast, Queensland, is a controlled action, that sections 18 and 18A (listed threatened species and communities) were controlling provisions for the controlled action, and that assessment would be on preliminary documentation. I made these decisions as a delegate of the Minister for the Environment and Energy, under section 75 and section 87 respectively of the *Environment Protection and Biodiversity Conservation Act 1999*.

This correspondence, and its attachments, is my statement of reasons[1].

My decision was based on my consideration of the decision brief prepared by the Department of the Environment and Energy. I considered that the information in the brief was sufficient for me to make the decisions.

In making my decisions, I considered all the information and matters contained in the brief referenced above. I agreed with the Department's advice, findings of fact, and reasoning iterated in the briefing. On that basis, I decided that the proposed action was a controlled action on 5 July 2018, that sections 18 and 18A (listed threatened species and communities) were controlling provisions for the controlled action, and that assessment would be on preliminary documentation.

Yours sincerely

James Barker
Assistant Secretary
Assessments and Governance Branch

6 / 5 / 2018

[1] I have redacted the names of junior officers. I have not provided copies of documents that are otherwise publically available, or attachments to the briefing documents that are otherwise summarised in the briefing.

FOI 180918
Document 1c

**Attachment D**

**Coomera Woods Master Planned Development (EPBC 2017/8134)**

**Table of documents for statement of reasons**

| Document | Is it (was it) publicly available? | Should it be released as part of the statement of reasons? | Comments |
|---|---|---|---|
| **Referral decision brief** | No | Yes (in part) | Delegate's decision on the referral and assessment approach was formed with consideration of this document. Names and contact details of Departmental officers associated with preparing the brief have been redacted. |
| Attachment A: Referral documentation | Yes | No | The referral is available on the Department's website. |
| Attachment B: Variation to the proposed action | Yes | No | The variation request and notice of the decision on the request are available on the Department's website. |
| Attachment C: Additional information to the referral | No | No | The key issues relating to the additional information to the referral were summarised and addressed in the referral decision brief. |
| Attachment D: Koala referral guidelines | Yes | No | The Koala referral guidelines are available on the Department's website. |
| Attachment E: 2015 Expert report | Unknown<br>(it has previously been released in full to Polaris Coomera Pty Ltd under FOI 160601) | No | Report was attached as background information to the referral and the key points of the report were summarised in the referral decision brief. |
| Attachment F: Environmental Reporting Tool (ERT) report 1 km (dated 26 June 2018) | Yes | No | The output of the ERT report can be reproduced via the tool available on the Department's website. |
| Attachment G: East Coomera Koala Population Study 2017 | Yes | No | The report is available from the City of Gold Coast's website. |

| | | | |
|---|---|---|---|
| Attachment H: Public comments | No | No | The key issues raised were summarised and addressed in the referral decision brief. |
| Attachment I: Ministerial comments | No | No | The key issues raised were summarised and addressed in the referral decision brief. |
| Attachment J: Fee schedule (with justifications) | No | No | The fee schedule did not form part of the delegate's decision on the referral or assessment approach. |
| Attachment K: Fee schedule (without justifications) | No | No | The fee schedule did not form part of the delegate's decision on the referral or assessment approach. |
| Attachment L: Decision notice | Yes | No | The decision notice is available on the Department's website. |
| Attachment M: Letters to Polaris Coomera Pty Ltd and the Queensland Government | No | No | The letters did not form part of the delegate's decision on the referral or assessment approach. |

FOI 180918
Document 2

**From:** s22
**To:** Barker, James
**Cc:** s22
**Subject:** 2017-8134 Coomera Woods Referral-SoR-briefing package [SEC=UNCLASSIFIED]
**Date:** Friday, 3 August 2018 12:52:50 PM
**Attachments:** 2017-8134 Referral-SoR-briefing package.xlsx

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Hi James

The briefing package for the statement of reasons on the referral decision for the Coomera Woods Master Planned Development (EPBC 2017/8134) is attached for your consideration and approval.

I have left hard copies of the documents for your signature in your in-tray.

Cheers

s22

Director – Queensland South and Sea Dumping Section
Assessments and Governance Branch
Department of the Environment and Energy
**T:** (02) 6274 s22 | **M:** s22
**E:** s22 @environment.gov.au

*The Department acknowledges the traditional owners of country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures and to their elders both past and present.*

FOI 180918
Document 2a

**Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland, (EPBC 2017/8134)**
**Statement of Reasons and Recommendation Reports - The Coomera Conservation Group and Polaris Coomera Pty Ltd**

Note - the versions of the documents below, considered by the delegate in making the decision, were the most recent versions of the documents on the date the decision was made.

| Document | Name | Document Description | Record Number |
|---|---|---|---|
| Brief | 2017-8134 Referral-SoR-Brief.docx | FOR SIGNATURE | |
| Att A | 2017-8134 Referral-SoR-Att A-request-Polaris.pdf | | |
| Att A | 2017-8134 Referral-SoR-Att A-request-CCG.msg | | |
| Att B | 2017-8134 Referral-SoR-Att B-Cover letter-Polaris.docx | FOR SIGNATURE | |
| Att B | 2017-8134 Referral-SoR-Att B-Cover letter-CCG.docx | FOR SIGNATURE | |
| Att C | 2017-8134 Referral-SoR-Att C-Referral Decision-Brief-Signed-Redacted | | |
| Att D | 2017-8134 Referral-SoR-Att D-Table of documents.docx | | |

# DEPARTMENT OF THE ENVIRONMENT AND ENERGY

**To:** James Barker, Assistant Secretary, Assessments and Governance Branch (for decision)

**Statement of Reasons for decision on referral and assessment approach—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland, (EPBC 2017/8134)**

**Timing:** Statutory timeframe is 9 August 2018.

**Recommendations:**

1. Consider the table at Attachment D outlining the referral decision brief and attachments recommended to form your statement of reasons.

**Considered / Please discuss**

2. Agree that the referral decision brief at Attachment C reflects your reasoning in making your decision under section 75 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) that the proposed action is a controlled action and your decision under section 87 on the approach for assessing the relevant impacts of the proposed action.

**Agreed / Not agreed**

3. If you agree to Recommendation 2, sign the letters to the Coomera Conservation Group and Polaris Coomera Pty Ltd (Attachment B) providing the document at Attachment C.

**Signed / Not signed**

**James Barker** **Date:**
**Assistant Secretary**
**Assessments and Governance Branch**

**Comments:**

**Key Points:**

1. Polaris Coomera Pty Ltd proposes to develop a residential master planned community at Coomera, approximately 20 km north of the Gold Coast, Queensland (proposed action).
2. On 5 July 2018, you determined, under section 75 of the EPBC Act, that the proposed action is a controlled action for likely significant impacts on listed threatened species and communities (sections 18 and 18A of the EPBC Act). On the same day you also determined, under section 87 of the EPBC Act, that the proposed action would be assessed by preliminary documentation under Division 4, Part 8 of the EPBC Act.
3. On 12 July 2018, the Department received a request from the Coomera Conservation Group for a statement of reasons for your controlled action decision (Attachment A).

4. On 17 July 2018, the Department received a request from Polaris Coomera Pty Ltd for a statement of reasons for your controlled action decision and your decision on the assessment approach (Attachment A).
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7. The Department has outlined which attachments of the referral decision brief were relevant to your decisions and should form part of your statement of reasons at Attachment D.

s22
Director
Queensland South and Sea Dumping Section
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T: (02) 6274 s22
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Assessment officer: s22
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**ATTACHMENTS**

A: Requests for a statement of reasons (dated 12 and 17 July 2018)

B: Cover letters – FOR SIGNATURE

C: Referral decision brief for provision as the statement of reasons

D: Table of documents attached to the referral decision brief

Australian Government
Department of the Environment and Energy

EPBC Ref: 2017/8134

Kaeko Omura
Managing Director
Polaris Coomera Pty Ltd
PO Box 105
SURFERS PARADISE QLD 4217

Dear Kaeko Omura

**Statement of Reasons for decision on referral and assessment approach—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland**

I am writing in response to your request, received on 17 July 2018, for a statement of reasons for my decision that your proposed action to develop a residential master planned community in Coomera, approximately 20 km north of the Gold Coast, Queensland, is a controlled action, that sections 18 and 18A (listed threatened species and communities) were controlling provisions for the controlled action, and that assessment would be on preliminary documentation. I made these decisions as a delegate of the Minister for the Environment and Energy, under section 75 and section 87 respectively of the *Environment Protection and Biodiversity Conservation Act 1999*.

This correspondence, and its attachments, is my statement of reasons[1].

My decision was based on my consideration of the decision brief prepared by the Department of the Environment and Energy. I considered that the information in the brief was sufficient for me to make the decisions.

In making my decisions, I considered all the information and matters contained in the brief referenced above. I agreed with the Department's advice, findings of fact, and reasoning iterated in the briefing. On that basis, I decided that the proposed action was a controlled action on 5 July 2018, that sections 18 and 18A (listed threatened species and communities) were controlling provisions for the controlled action, and that assessment would be on preliminary documentation.

Yours sincerely

James Barker
Assistant Secretary
Assessments and Governance Branch

/ / 2018

[1] I have redacted the names of junior officers. I have not provided copies of documents that are otherwise publically available, or attachments to the briefing documents that are otherwise summarised in the briefing.

EPBC Ref: 2017/8134

Ms Karina Waterman
Coomera Conservation Group
PO Box 1195
OXENFORD QLD 4210

Dear Ms Waterman

**Statement of Reasons for decision on referral and assessment approach—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland**

I am writing in response to your request, received on 12 July 2018, for a statement of reasons for my decision that the proposed action by Polaris Coomera Pty Ltd to develop a residential master planned community in Coomera, approximately 20 km north of the Gold Coast, Queensland, is a controlled action, that sections 18 and 18A (listed threatened species and communities) were controlling provisions for the controlled action, and that assessment would be on preliminary documentation. I made these decisions as a delegate of the Minister for the Environment and Energy, under section 75 and section 87 respectively of the *Environment Protection and Biodiversity Conservation Act 1999*.

This correspondence, and its attachments, is my statement of reasons[1].

My decision was based on my consideration of the decision brief prepared by the Department of the Environment and Energy. I considered that the information in the brief was sufficient for me to make the decisions.

In making my decisions, I considered all the information and matters contained in the brief referenced above. I agreed with the Department's advice, findings of fact, and reasoning iterated in the briefing. On that basis, I decided that the proposed action was a controlled action on 5 July 2018, that sections 18 and 18A (listed threatened species and communities) were controlling provisions for the controlled action, and that assessment would be on preliminary documentation.

Yours sincerely

James Barker
Assistant Secretary
Assessments and Governance Branch

/ / 2018

[1] I have redacted the names of junior officers. I have not provided copies of documents that are otherwise publically available, or attachments to the briefing documents that are otherwise summarised in the briefings.

FOI 180918
Document 3

# DEPARTMENT OF THE ENVIRONMENT AND ENERGY

**To:** James Barker, Assistant Secretary, Assessments and Governance Branch, (for decision)

**Referral Decision Brief—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland, (EPBC 2017/8134)**

**Timing:** as soon as practicable, the statutory timeframe of 24 January 2018 has passed.

| | |
|---|---|
| **Recommended Decision** | **NCA** ☐ **NCA(pm)** ☐ **CA** ☒ |
| **Designated Proponent** | Polaris Coomera Pty Ltd<br>ACN: 130 648 056 |
| **Controlling Provisions triggered or matters protected by particular manner** | World Heritage (s12 & s15A) Yes ☐ No ☒ No if PM ☐<br>National Heritage (s15B & s15C) Yes ☐ No ☒ No if PM ☐<br>Ramsar wetland (s16 & s17B) Yes ☐ No ☒ No if PM ☐<br>Threatened Species & Communities (s18 & s18A) Yes ☒ No ☐ No if PM ☐<br>Migratory Species (s20 & s20A) Yes ☐ No ☒ No if PM ☐<br>C'wealth marine (s23 & 24A) Yes ☐ No ☒ No if PM ☐<br>Nuclear actions (s21 & 22A) Yes ☐ No ☒ No if PM ☐<br>C'wealth land (s26 & s27A) Yes ☐ No ☒ No if PM ☐<br>C'wealth actions (s28) Yes ☐ No ☒ No if PM ☐<br>GBRMP (s24B & s24C) Yes ☐ No ☒ No if PM ☐<br>A water resource – large coal mines and CSG (s24D & s24E) Yes ☐ No ☒ No if PM ☐<br>C'wealth heritage o/s (s27B & 27C) Yes ☐ No ☒ No if PM ☐ |
| **Public Comments** | Yes ☒ No ☐ Number: 8 See Attachment H |
| **Ministerial Comments** | Yes ☒ No ☐ Who: See Attachment I |
| **Assessment Approach Decision** | Yes ☒ No ☐ What: Preliminary Documentation<br>Bilateral Applies ☐ |

**Recommendation/s:**

1. Consider the information in this brief, the referral (Attachment A) and other attachments.

**Considered / Please discuss**

2. Agree with the recommended decision.

**Agreed / Not agreed**

3. Agree to the designated proponent.

**Agreed / Not agreed**

4. Agree the action be assessed on preliminary documentation.

**Agreed / Not agreed**

5. If you agree to Recommendation 2 and 4, indicate that you accept the reasoning in the Departmental briefing package as the basis for your decision.

**Accepted / Please discuss**

6. Agree to the fee schedule (with justification) at Attachment J and that the fee schedule (without justification) at Attachment K be sent to the person proposing to take the action.

**Agreed / Not agreed**

7. Note that an invoice will be provided in the letter to the person proposing to take the action for Stage 1 of the assessment, for the preparation of the Preliminary Documentation information required. A separate letter requiring further information will be prepared within 10 business days of payment.

**Noted / Please discuss**

8. Sign the notice at Attachment L (which will be published if you make the recommended decision).

**Signed / Not signed**

9. Sign the letters at Attachment M.

**Signed / Not signed**

Date: 5/1/18

**James Barker, Assistant Secretary, Assessments and Governance Branch:**

**Comments:**

## BACKGROUND:

### Description of the referral

A referral was received on 22 December 2017 (Attachment A). The referral was made by Polaris Coomera Pty Ltd (person proposing to take the action and proponent), which has stated its belief that the proposed action is not a controlled action for the purposes of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

### Description of the proposal (including location)

The proposed action is to develop a residential master planned community in Coomera, approximately 20 km north of the Gold Coast, Queensland. The proposed action includes medium and high density residential uses with integrated open space and conservation areas over approximately 147 ha (the site). The proposed action involves clearing of approximately 137 ha of vegetation, with the remaining 10 ha proposed to be retained.

**Variation to the referral**

On 7 May 2018, the person proposing to take the action submitted a request to vary the proposed action under section 156A of the EPBC Act. The variation proposed to exclude the clearing of approximately 1.5 ha of vegetation (10 m wide, 1.5 km long) along the northern boundary of the site. The variation request was accepted on 21 May 2018 (Attachment B).

As a consequence, the amount of vegetation to be cleared as a result of the proposed action is approximately 135.5 ha. The proposed action still involves development over the approximate 147 ha site as originally proposed.

**Additional information to the referral**

The person proposing to take the action provided additional information to support the information in their referral on 18 January 2018, 12 March 2018, 6 April 2018 and 7 May 2018 (Attachment C). Whilst this information was not provided in response to a formal request made under section 76 or section 89 of the EPBC Act, the Department considers it is appropriate to consider this information in making a decision under section 75 about whether the action is a controlled action and what (if any) provisions of Part 3 are controlling provisions.

**Description of the environment**

The referral states the site is dominated by Eucalypt Woodland / Open Forest including vegetation which is mapped as remnant by the Queensland Government. No significant drainage or riparian zones existing within the site. The site is bordered by existing residential development to the north and east and by the South Coast Railway to the west.

**Related referrals**

Polaris Coomera Pty Ltd has made a number of referrals for developments in the immediate vicinity of the site. These include:

- Coomera Woods Protection Zone, 49 George Alexander Way, Coomera, Queensland, (EPBC 2018/8214). This referral proposes the clearing of approximately 1.5 ha of vegetation (10 m wide, 1.5 km long) along the northern boundary of Lot 44 on SP207822 (being the subject of the variation to referral EPBC 2017/8134). The Department will brief separately on referral EPBC 2018/8214.

- Coomera Woods Master Planned Residential Development, Queensland (EPBC 2015/7610). The referral was for the same proposed development of a residential master planned community on the same footprint that is now the subject of referral EPBC 2017/8134 (being the subject of this brief). The proposal that was the subject of referral EPBC 2015/7610 was determined to be a controlled action for likely significant impacts on listed threatened species and communities, including for impacts to the Koala, on 29 January 2016. That referral was withdrawn on 15 December 2017, prior to the referral for EPBC 2017/8134 being submitted on 22 December 2017.

- Industrial Subdivision, Old Pacific Highway, Coomera, Queensland (EPBC 2013/6819). This proposal lies to the west of the site between the South Coast Railway and the Old Pacific Highway. Following a request for reconsideration (made by Polaris Coomera Pty Ltd) of the original controlled action decision, the proposal was determined to be not a controlled action on 7 March 2014.

The site is in the immediate vicinity of the following previously referred actions:

- The Big Sky Estate Residential Development Stages 5-8, (**2015/7535**), located to the east of the site, involves the clearing of 13.97 ha of Koala habitat and was determined not a controlled action on 18 September 2015.

- The Mixed Use Development, (**2015/7488**), located to the east of the site, involves the clearing of 2.4 ha of Koala habitat and was determined not a controlled action on 24 June 2015.
- The Coomera Northern Frame Residential and Commercial Development Precinct, (**2014/7291**) and adjoining Coomera Town Shopping Centre Development (**2014/7292**), located south east of the site, involve the clearing of 17 ha and 14.4 ha respectively, of Koala habitat, and both were determined not a controlled action on 27 August 2014.
- The Big Sky Estate Residential Development Stages 4, 9 and 10 (**2014/7192**), located to the east of the site, involves the clearing of 18.96 ha of Koala habitat and was determined not a controlled action on 26 May 2014.
- The Coomera Urban Village development - stages 1 and 2, (**2014/7124**), located to the south east of the site, involves the clearing of up to 11.34 ha (including Koala habitat) and was determined not a controlled action on 3 March 2014.
- The 100 Amity Road residential subdivision (**2013/6797**), located to the east of the site, involves the clearing of up to 6.2 ha of Koala habitat and was determined not a controlled action on 30 April 2013.
- The Pimpama Junction Shopping Precinct development (**2013/6772**), located to the north of the site, involves the clearing of up to 3 ha of Koala habitat and was determined not a controlled action on 15 April 2013.
- The Gainsborough Greens residential subdivision (**2013/6751**), located to the north of the proposal, involves the clearing of up to 60 ha of Koala habitat, was determined a controlled action on 12 July 2013, and was approved with conditions on 18 September 2014.
- The 54-64 Karingal Drive residential subdivision (**2013/6739**), located to the north of the site, involves the clearing of up to 5 ha of Koala habitat and was determined not a controlled action on March 5 2013.
- The 70-78 Karingal Drive residential subdivision (**2013/6716**), located to the north of the site, involves the clearing of up to 7 ha of Koala habitat and was determined not a controlled action on March 5 2013.

**KEY ISSUES:**

- In February 2014, the Department's Office of Compliance enquired into the then proposed development of a residential master planned community at the site by Polaris Coomera Pty Ltd.
- Through those enquiries, the Office of Compliance engaged the services of Dr Stephen Phillips, from Biolink Ecological Consultants, as an expert suitably qualified to advise on the presence and quality of Koala habitat at the site, the presence and size of a Koala population at the site, and the consequences of proposed clearing with reference to the Koala referral guidelines[1] (Attachment D). As part of the enquiries, a site inspection was undertaken on 13 June 2015 (Attachment E).
- Whilst the Office of Compliance was not required to form a view on the likelihood of significant impacts as a result of the proposed development (as referral EPBC 2015/7610 was subsequently submitted voluntarily), it was satisfied with the conclusions made by

[1] Department of the Environment (2014). *EPBC Act referral guidelines for the vulnerable koala (combined populations of Queensland, New South Wales and the Australian Capital Territory*. Australian Government, Canberra.

Dr Phillips—that a resident population of koalas occurred on the site, and that the majority (93 per cent) of the site would qualify as high-quality koala habitat (Dr Phillips scored the site 7 using the Koala referral guidelines).

**RECOMMENDED DECISION:**

Under section 75 of the EPBC Act you must decide whether the action that is the subject of the referral is a controlled action, and which provisions of Part 3 (if any) are controlling provisions. In making your decision you must consider all adverse impacts the action has, will have, or is likely to have, on the matter protected by each provision of Part 3. You must not consider any beneficial impacts the action has, will have or is likely to have on the matter protected by each provision of Part 3.

The Department recommends that you decide that the proposed action is a controlled action, because there are likely to be significant impacts on listed threatened species and communities (sections 18 & 18A). The reasons for this recommendation are detailed further below.

**Listed threatened species and communities**

The Department's Environment Reporting Tool (ERT) identifies species and communities may occur within 1 km of the proposed action (see the ERT report at Attachment F). Based on the location of the proposed action and likely habitat present, the Department considers that impacts potentially arise in relation to the following matters.

Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory) (*Phascolarctos cinereus (combined populations of Qld, NSW and the ACT)*— vulnerable

The ERT indicates that the species or its habitat is known to occur within or near the proposed action. The referral considers the entire site (approximately 147 ha) supports Koala food trees and therefore would likely be Koala habitat. Noting the clearing of approximately 1.5 ha of vegetation is excluded from this referral (rather it is the subject of referral EPBC 2018/8214) the proposed action is likely to result in the clearance of approximately 135.5 ha of potential Koala habitat and possible indirect impacts to the remaining 10 ha set aside as open space and conservation areas, through factors such as isolation.

The referral scored the habitat as 4 (using the Koala referral guidelines). Habitat that scores 5 or more in accordance with the referral guidelines is considered to be habitat critical to the survival of the species. The Department disagrees with the score of 4 presented in the referral, and instead considers a score of 7 is more appropriate. In particular,

- Koala occurrence: the referral scored this attribute (+2). The Department agrees.
- Vegetation composition: the referral scored this attribute (+2). The Department agrees.
- Habitat connectivity: the referral scored this attribute (+0). The proponent justified this score on the basis of their assessment that no habitat connectivity values will be retained in the short or long term surrounding the site.

  While the Department accepted this rationale when the proposed action was previously referred (EPBC 2015/7610), the Department now considers a score of (+2) is more appropriate on the basis of new information contained in a 2017 Koala population study commissioned by the City of Gold Coast (Attachment G). This study demonstrates the site is connected to other habitat areas (>500ha) within East Coomera and that the broader area (within which the site is located) supports a viable sub-population. There is also evidence of Koala movement between the broader habitat area and the site. On this basis, the Department considers there is unlikely to be substantial barriers to movement between the

site and the broader East Coomera area. In forming this view, the Department has considered the context and nature of previous projects referred and approved under the EPBC Act in the vicinity of the site.

- Key existing threats: the referral scored this attribute (+0). The Department considers the referral generally presents information about threat sources and Koala mortality in the area and there is limited information available to suggest a different score could be more appropriate.
- Recovery value: the referral scored this attribute (+0). The Department considers a score of (+1) is more appropriate.

  The Koala referral guidelines measure recovery value based on how likely the habitat is to be important for achieving the interim recovery objectives, which in the coastal context are:

  - Protect and conserve large, connected areas of Koala habitat, particularly large, connected areas that support Koalas that are:
    - of sufficient size to be genetically robust / operate as a viable sub-population OR
    - free of disease or have a very low incidence of disease OR
    - breeding.
  - Maintain corridors and connective habitat that allow movement of Koalas between large areas of habitat.

  The Koala population study concluded there is a viable sub-population across the 1,467 ha of available Koala habitat in East Coomera, including the site of the proposed action. At 147 ha, the site makes up approximately 10 per cent of the habitat available to the East Coomera sub-population and therefore may be important to achieving the interim recovery objectives.

  Therefore, the Department considers that, at the very least, there is uncertainty as to whether the site is important for achieving the interim recovery objectives. Therefore it is appropriate to attribute a score of one (+1) for recovery value. Further information about the sites recovery value will be requested during the assessment process.

On the basis of the information above, the Department considers the habitat scores 7 making it habitat critical to the survival of the Koala.

*Other potential impacts*

Additional to the impacts of clearing of 135.5 ha of habitat and isolating the remaining 10 ha, the proposed action may remove or reduce connectivity to other areas of East Coomera and introduce additional threats such as vehicle strike and dog attack. Additional information to quantify these impacts will be sought during the assessment.

*Conclusion*

The Koala referral guidelines indicate a significant impact is likely where 25 ha of habitat scoring 6 or 7 is completely cleared. Noting this and the information above, the Department considers the proposed action is likely to have a significant impact on the Koala.

Greater Glider (*Petauroides volans*)—vulnerable

The ERT indicates the species or its habitat is known to occur within or near the proposed action. The conservation advice[2] says the species is typically found in highest abundance in taller, montane, moist eucalypt forests with relatively old trees and abundant hollows, which it shelters in during the day. The referral does not consider the potential presence of the species and no field surveys specific to the Great Glider were conducted. General fauna and habitat surveys of the site identified individuals of several arboreal mammal species, but no Greater Glider individuals.

On 6 April 2018, the person proposing the action provided additional information about the presence of Greater Glider at the site (Attachment C). This information shows the methodologies and results for arboreal mammal surveys of six nearby and adjacent properties, over a 15 year period from 2003 to 2017. Total area surveyed, including the site itself, is approximately 550 ha in East Coomera. While these surveys did not specifically target the Greater Glider, no Greater Glider individuals were opportunistically observed in any of these surveys.

The Department considers the combined results of the general fauna and habitat surveys of the site, and of the nearby and adjacent properties, provide adequate evidence that the site and surrounding area are not likely to contain an important population or habitat critical to the survival of the species. On this basis, the Department considers a significant impact to the species as a result of the proposed action is unlikely.

*Other listed species and communities*

The ERT identifies the potential presence of additional species and communities within or near the site. Based on information available to the Department, including from the Species Profile and Threats database and the referral, the Department considers that significant impacts to these species and communities are unlikely.

**PROTECTED MATTERS THAT ARE NOT CONTROLLING PROVISIONS:**

**Listed migratory species**

The ERT identifies 17 species that may occur within 1 km of the proposed action (Attachment F). The referral does not include any information about the likely occurrence or nature of potential impacts to migratory species. Given the location of the site and the lack of significant drainage or riparian zones, the Department considers that of the migratory species identified in the ERT, only the migratory terrestrial species described below have the potential to be impacted.

The Oriental Cuckoo (*Cuculus optatus*) and the Black-faced Monarch (*Monarcha melanopsis*) generally prefer rainforest and wetter Eucalypt forest. The White-throated Needletail (*Hirundapus caudacutus*) is almost exclusively aerial and wide ranging across Australia. The Spectacled Monarch (*Monarcha trivirgatus*) mainly occurs in rainforest.

The Satin Flycatcher (*Myiagra cyanoleuca*) is widespread in eastern Australia and mainly inhabits eucalypt forests, often near wetlands or watercourses. The Rufous Fantail (*Rhipidura rufifrons*) mainly inhabits wet sclerophyll forests, often in gullies dominated by eucalypts, usually with a dense shrubby understorey often including ferns.

[2] Threatened Species Scientific Committee (2016). *Approved Conservation Advice for* Petauroides volans (*greater glider*). Commonwealth of Australia, Canberra.

The Department considers the site does not contain the above habitat features, necessary to support the listed migratory species identified in the ERT. On the basis of the information above, the Department considers the proposed action is unlikely to support important habitat for a migratory species, seriously disrupt the lifecycle of a migratory species or result in an invasive species that is harmful to a migratory species being established. Therefore, significant impacts to migratory species are unlikely.

| | |
|---|---|
| **Ramsar Wetlands** | The ERT did not identify any Ramsar listed wetland of international importance within or adjacent to the proposed action, therefore this controlling provision does not apply. |
| **World Heritage properties** | The ERT did not identify any World Heritage properties located within or adjacent to the proposed action, therefore this controlling provision does not apply. |
| **National Heritage places** | The ERT did not identify any National Heritage places located within or adjacent to the proposed action, therefore this controlling provision does not apply. |
| **Commonwealth marine environment** | The proposed action does not occur in the vicinity of a Commonwealth marine environment, therefore this controlling provision does not apply. |
| **Commonwealth action** | The referring party is not a Commonwealth agency, therefore this controlling provision does not apply. |
| **Commonwealth land** | The proposed action is not being undertaken on Commonwealth land, therefore this controlling provision does not apply. |
| **Nuclear action** | The proposed action does not meet the definition of a nuclear action as defined in the EPBC Act, therefore this controlling provision does not apply. |
| **Great Barrier Reef Marine Park** | The proposed action is over 300km from the Great Barrier Reef Marine Park, therefore this controlling provision does not apply. |
| **Commonwealth Heritage places overseas** | The proposed action is not located overseas, therefore this controlling provision does not apply. |
| **A water resource, in relation to coal seam gas development and large coal mining development** | The proposed action is not a coal seam gas or a large coal mining development, therefore this controlling provision does not apply. |

## SUBMISSIONS:

### Public submissions

The referral was published on the Department's website and public comments were invited from 3 January 2018 until 17 January 2018. A total of 8 public submissions were received on the referral (Attachment H). The submissions raised a number of views / issues including about the potential impacts to the Koala, the long-term viability of the broader Koala population, and the presence of a new and independent Koala study for the East Coomera area (the Koala

population study). The Department has considered the public submissions, and addressed relevant matters in this brief.

**Comments from Commonwealth Ministers**
No Commonwealth Ministers were invited to comment on the referral.

**Comments from State/Territory Ministers**
By letter dated 3 January 2018, the Hon Leeanne Enoch MP, Queensland Minister for Environment and the Great Barrier Reef, Minister for Science and Minister for the Arts, was invited to comment on the referral.

On 17 January 2018, a delegate of the Minister responded (Attachment I) stating that the proposed action would not be assessed using the environmental impact statement process in Chapter 3 of the *Environmental Protection Act 1994* (Qld). The response also stated that the Department of State Development, Manufacturing, Infrastructure and Planning had advised that the Coordinator-General had not received a request for declaration of the proposed action as a coordinated project under Part 4 of the *State Development and Public Works Organisation Act 1971* (Qld).

## ASSESSMENT APPROACH:

If you agree that the action is a controlled action, you must decide on the approach for assessment in accordance with section 87 of the EPBC Act. The Department recommends that this proposal be assessed on preliminary documentation under Part 8 of the EPBC Act.

Given the location of matters of national environmental significance, the number of matters likely to be impacted, and the scale and potential impacts of the proposed action, assessment on preliminary documentation represents an appropriate method that will ensure that impacts on the controlling provisions are appropriately assessed.

Under paragraph 87(3)(b) of the EPBC Act, you must consider any other relevant information available about the relevant impacts of the action, including information in a report on the impacts of actions under a policy, plan or program under which the action is to be taken that was given to the Minister under an agreement under Part 10 (about strategic assessments). There are no strategic assessments relevant to the proposed action and the Department is not aware of the any other relevant information for your consideration.

Under subsection 87(5) of the EPBC Act, you may decide on an assessment on preliminary documentation only if you are satisfied that the approach will enable an informed decision to be made about whether or not to approve the taking of the action. In this case, the number and complexity of relevant impacts is low and locally confined. The referral has provided sufficient information regarding the likely sources of impacts and proposed mitigation and management. Assessment on preliminary documentation is therefore considered appropriate for this proposed action.

## OTHER MATTERS FOR DECISION-MAKING:

**Significant impact guidelines**
The Department has reviewed the information in the referral against the *EPBC Act Policy Statement 1.1 Significant Impact Guidelines – Matters of National Environmental Significance* (December 2013) and other relevant material. While this material is not binding or exhaustive, the factors identified are considered adequate for decision-making in the circumstances of this referral.

**Precautionary principle**

In making your decision under section 75, you are required to take account of the precautionary principle (section 391). The precautionary principle is that a lack of full scientific certainty should not be used as a reason for postponing a measure to prevent degradation of the environment where there are threats of serious or irreversible environmental damage.

**Cost Recovery**

The fee schedule (with justifications) for your consideration is at Attachment J. The fee schedule (without justifications) at Attachment K will be sent to the person taking the action, including an invoice for Stage 1, seeking fees prior to the commencement of any further activity.

s22

Director
Queensland South and Sea Dumping Section
Assessments and Governance Branch
T: (02) 6274 s22
5 / 7 / 2018

Assessment officer: s22
Queensland South and Sea Dumping Section
T: (07) s22

**ATTACHMENTS**

A: Referral documentation

B: Variation to the proposed action

C: Additional information to the referral

D: Koala referral guidelines

E: 2015 Expert report

F: ERT 1 km

G: East Coomera Koala Population Study 2017

H: Public comments

I: Ministerial comments

J: Fee schedule (with justifications)

K: Fee schedule (without justifications)

L: Decision notice—FOR SIGNATURE

M: Letters to Polaris Coomera Pty Ltd and the Queensland Government—FOR SIGNATURE

FOI 180918
Document 3a

| Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Commera, Queensland (EPBC 2017/8134) | | | | |
|---|---|---|---|---|
| Variation decision briefing package - provided to delegate 18 May 2018 | | | | |
| **Document** | **Name** | **Document Description** | **Record Number** | **Modified** |
| Package | 2017-8134 Variation request-decision-package.pdf | Decision package provided to delegate | | 21/05/2018 14:08 |
| Brief | 2017-8134 Variation request-decision brief-signed.pdf | Signed decision brief | | 21/05/2018 14:10 |
| Att A | 2017-8134 referral.pdf | Referral | 002118240 | 3/01/2018 14:05 |
| Att A | 2017-8134 Referral-Attach-coomera_submission_regarding_referral_of_proposed_action_under_epbc_act.pdf | Referral attachment | 002118257 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_development_plans.pdf | Referral attachment | 002118218 | 4/01/2018 10:00 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_ecological_technical_note_shg_part_1.pdf | Referral attachment | 002118249 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_ecological_technical_note_shg_part_2.pdf | Referral attachment | 002118261 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_koala_assessment_report_shg.pdf | Referral attachment | 002118266 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_koala_assessment_report_shg_figures_1-3.pdf | Referral attachment | 002118263 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_koala_assessment_report_shg_figures_4-7.pdf | Referral attachment | 002118222 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_koala_evaluation_and_assessment_chapter_1_planit.pdf | Referral attachment | 002118201 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_koala_evaluation_and_assessment_chapter_2_planit.pdf | Referral attachment | 002118223 | 22/12/2017 13:49 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_within_coomera_town_centre_plan.pdf | Referral attachment | 002118282 | 4/01/2018 10:02 |
| Att A | 2017-8134 Referral-Attach-ecological_assessment_coomera_woods_planit.pdf | Referral attachment | 002118244 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-ecological_assessment_coomera_woods_planit_attachments.pdf | Referral attachment | 002118246 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-koala_conservation_plan_council_part_1.pdf | Referral attachment | 002118209 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-koala_conservation_plan_council_part_2.pdf | Referral attachment | 002118214 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-koala_conservation_plan_for_east_coomera_council_part_1.pdf | Referral attachment | 002118233 | 22/12/2017 13:49 |
| Att A | 2017-8134 Referral-Attach-koala_conservation_plan_fpr_east_coomera_council_part_2.pdf | Referral attachment | 002118205 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-preclearing_fauna_assesment_and_management_plan_planit_figures_5-8.pdf | Referral attachment | 002118276 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-preclearing_fauna_assessment_and_management_plan_planit_atts_part_1.pdf | Referral attachment | 002118294 | 22/12/2017 13:49 |
| Att A | 2017-8134 Referral-Attach-preclearing_fauna_assessment_and_management_plan_planit_atts_part_2.pdf | Referral attachment | 002118255 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-preclearing_fauna_assessment_and_management_plan_planit_part_1.pdf | Referral attachment | 002118269 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-preclearing_fauna_assessment_and_management_plan_planit_part_2.pdf | Referral attachment | 002118284 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-preclearing_fauna_assessment_and_management_plan_planit_part_3.pdf | Referral attachment | 002118288 | 22/12/2017 13:49 |
| Att A | 2017-8134 Referral-Attach-preclearing_fauna_assessment_and_management_plan_planit_part_4.pdf | Referral attachment | 002118290 | 22/12/2017 13:49 |
| Att A | 2017-8134 Referral-Attach-preclearing_fauna_assessment_and_management_plan_planit_part_5.pdf | Referral attachment | 002118273 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-vegetation_management_plan_planit_2014.pdf | Referral attachment | 002118252 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-vegetation_management_plan_planit_2014_figures.pdf | Referral attachment | 002118211 | 22/12/2017 13:48 |
| Att B | 2017-8134 Referral-request to vary action.pdf | Variation request | | 8/05/2018 10:33 |
| Att C | 2017-8134 Variation request-decision-EPBC excerpts.pdf | EPBC Act and EPBC Regulations excerpts | | 17/05/2018 16:56 |
| Att D | 2017-8134 Variation request-variation notice-signed.pdf | Signed decision notice | | 21/05/2018 14:08 |
| Att E | 2017-8134 Variation request-decision letter-proponent-signed.pdf | Signed letter - Polaris Coomera Pty Ltd | | 21/05/2018 14:08 |
| Att E | 2017-8134 Variation request-decision letter-qld-signed.pdf | Signed letter- Queensland Government | | 21/05/2018 14:08 |

FOI 180918
Document 3b

**DEPARTMENT OF THE ENVIRONMENT AND ENERGY**

**To:** James Barker, Assistant Secretary, Assessments and Governance Branch, (for decision)

**Variation of proposal to take an action—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland (EPBC 2017/8134)**

**Timing:** 7 June 2018 – statutory timeframe.

**Recommendations:**

1. Consider the information in this brief and attachments.

**Considered / Please discuss**

2. Agree to accept the varied proposal to take an action under section 156B of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

**Agreed / Not agreed**

3. If you agree to Recommendation 2, indicate that you accept the reasoning in the Departmental briefing package as the basis for your decision.

**Accepted / Please discuss**

4. Sign the notice at Attachment D, which will be published if you accept the variation.

**Signed / Not signed**

5. Sign the letters at Attachment E, advising the person proposing to take the action and the Queensland Government of your decision.

**Signed / Not signed**

**James Barker**
**Assistant Secretary**
**Assessments and Governance Branch:**

**Date:** 21/5/18

**Comments:**

## Background

1. A referral was received on 22 December 2017 from Polaris Coomera Pty Ltd (person proposing to take the action) to develop a residential master planned community supporting medium and high density residential uses with integrated open space and conservation areas in Coomera, Queensland (proposed action). A copy of the referral is at Attachment A.

2. On 7 May 2018, the Department received a request from Polaris Coomera Pty Ltd to vary the proposed action under section 156A of the EPBC Act (Attachment B). On 10 May 2018, Polaris Coomera Pty Ltd paid the cost recovery fee associated with the request.

## Assessment

3. Variation requests can only be made under certain circumstances. An excerpt of the requirements under the EPBC Act is at Attachment C. In this instance, as the proposed action has been referred under Division 1 of Part 7, no decision has been made under section 74A to not accept the referral, and no decision has been made on whether the proposed action is a controlled action and which provisions of Part 3 (if any) are controlling provisions, the Department considers the request can be made.

4. Requests must also be made in the way and must include the information prescribed by the *Environment Protection and Biodiversity Conservation Regulations 2000* (EPBC Regulations). An excerpt of the requirements is at Attachment C. The Department considers the request meets those requirements.

5. Under section 156B of the EPBC Act you must not decide to accept the varied proposal unless you are satisfied that the character of the varied proposal is substantially the same as the character of the original proposal. In considering this you must have regard to the change (if any) in the nature of the activities proposed to be carried out in taking the action, and the nature and extent of the impacts (if any) the action has or will have, or is likely to have on the matter protected by each provision of Part 3 of the EPBC Act.

6. The original proposal was to develop a residential development over a 147 hectare site and included activities such as land clearing, construction of dwellings, retail and commercial precincts and associated infrastructure and services.

7. The varied proposal proposes the same residential development on the same site and includes the same activities as the original proposal but excludes the clearing of 1.5 hectares of vegetation along the northern boundary of the site. The proposed exclusion of this clearing has been made on the basis that this vegetation poses a safety hazard and fire risk to neighbouring properties and needs to be cleared in advance of taking the proposed action.

8. Given this, the Department considers that the character of the varied proposal is substantially the same as the character of the original proposal and the nature of the activities proposed to be carried out in taking the action is similar.

9. The variation request considers no additional protected matters beyond those potentially impacted by the original proposal would be affected as a result of the varied proposal. The Department considers that the varied proposal will only slightly reduce the amount of clearing associated with the proposed action and the nature and extent of the impacts are similar to the original proposal.

**Recommendation**

10. Based on the information in this brief and attachments, the Department recommends that you accept the varied proposal to take an action in accordance with section 156B of the EPBC Act.

11. If you agree, the Department recommends you sign the variation notice at Attachment D and the letter at Attachment E advising Polaris Coomera Pty Ltd of your decision.

12. If you accept the varied proposal, the Department also recommends you inform the appropriate Queensland Minister of your decision. A letter to the Queensland Minister for Environment and the Great Barrier Reef, Minister for Science and Minister for the Arts, is at Attachment E.

13. If you agree to accept the varied proposal, the variation request and the notice of your decision will be published on the Department's website.

s22

A/g Director
Queensland South and Sea Dumping Section
Phone: (02) s22
18 May 2018

s22

Queensland South and Sea Dumping Section
Phone: (07) s22

**Attachments**

A: Referral

B: Variation request

C: EPBC Act and EPBC Regulations excerpts

D: Decision notice—FOR SIGNATURE

E: Letters to Polaris Coomera Pty Ltd and the Queensland Government—FOR SIGNATURE

EPBC Ref: 2017/8134

Kaeko Omura
Managing Director
Polaris Coomera Pty Ltd
PO Box 105
SURFERS PARADISE QLD 4217

Dear Kaeko Omura

**Decision on variation of proposal to take an action—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland**

I am writing to you in response to your letter dated 4 May 2018 requesting a variation of your above proposal under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). As a delegate of the Minister for the Environment and Energy, I have decided to accept the varied proposal. A copy of the notice recording this decision is attached. This document, along with your request, will be published on the Department's website.

As a result of my decision, the provisions of Chapter 4 of the EPBC Act that ceased to apply in relation to the original proposal start to apply in relation to the varied proposal and for the purpose of the application of those provisions, anything done in relation to the original proposal is taken to have been done in relation to the varied proposal.

If you have any questions about this decision, please contact the project manager, s22 by email to s22 @environment.gov.au, or phone 07 s22 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

James Barker
Assistant Secretary
Assessments and Governance Branch

21 / 5 / 2018

EPBC Ref: 2017/8134

s22
Director
Impact Assessment and Operational Support
Department of Environment and Science
GPO Box 2454
BRISBANE QLD 4001

Dear s22

**Decision on variation of proposal to take an action—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland**

I am writing to you as delegated contact for the Hon Leeanne Enoch MP, Queensland Minister for Environment and the Great Barrier Reef, Minister for Science and Minister for the Arts, regarding a request by Polaris Coomera Pty Ltd to vary their above proposal under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

As a delegate of the Minister for the Environment and Energy, I have decided to accept the varied proposal. A copy of the notice recording this decision is attached. This document, along with the request, will be published on the Department's website.

As a result of my decision, the provisions of Chapter 4 of the EPBC Act that ceased to apply in relation to the original proposal start to apply in relation to the varied proposal and for the purpose of the application of those provisions, anything done in relation to the original proposal is taken to have been done in relation to the varied proposal.

If you have any questions about this decision, please contact the project manager, s22 by email to s22@environment.gov.au, or phone 07 s22 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

James Barker
Assistant Secretary
Assessments and Governance Branch

21 / 5 / 2018

FOI 180918
Document 3e

Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Commera, Queensland (EPBC 2017/8134)

Variation decision briefing package - provided to delegate 18 May 2018

| Document | Name | Document Description | Record Number | Version | Modified |
|---|---|---|---|---|---|
| Brief | 2017-8134-Variation request-decision brief.docx | For signature - decision brief | 002225537 | 0.11 | 17/05/2018 16:42 |
| Att A | 2017-8134 referral.pdf | Referral | 002118240 | 0.2 | 3/01/2018 14 05 |
| Att A | 2017-8134 Referral-Attach-coomera_submission_regarding_referral_of_proposed_action_under_epbc_act.pdf | Referral attachment | 002118257 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_development_plans.pdf | Referral attachment | 002118218 | 0.2 | 4/01/2018 10 00 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_ecological_technical_note_shg_part_1.pdf | Referral attachment | 002118249 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_ecological_technical_note_shg_part_2.pdf | Referral attachment | 002118261 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_koala_assessment_report_shg.pdf | Referral attachment | 002118266 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_koala_assessment_report_shg_figures_1-3.pdf | Referral attachment | 002118263 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_koala_assessment_report_shg_figures_4-7.pdf | Referral attachment | 002118222 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_koala_evaluation_and_assessment_chapter_1_planit.pdf | Referral attachment | 002118201 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_koala_evaluation_and_assessment_chapter_2_planit.pdf | Referral attachment | 002118223 | 0.1 | 22/12/2017 13:49 |
| Att A | 2017-8134 Referral-Attach-coomera_woods_within_coomera_town_centre_plan.pdf | Referral attachment | 002118282 | 0.2 | 4/01/2018 10 02 |
| Att A | 2017-8134 Referral-Attach-ecological_assessment_coomera_woods_planit.pdf | Referral attachment | 002118244 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-ecological_assessment_coomera_woods_planit_attachments.pdf | Referral attachment | 002118246 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-koala_conservation_plan_council_part_1.pdf | Referral attachment | 002118209 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-koala_conservation_plan_council_part_2.pdf | Referral attachment | 002118214 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-koala_conservation_plan_for_east_coomera_council_part_1.pdf | Referral attachment | 002118233 | 0.1 | 22/12/2017 13:49 |
| Att A | 2017-8134 Referral-Attach-koala_conservation_plan_fpr_east_coomera_council_part_2.pdf | Referral attachment | 002118205 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-preclearing_fauna_assesment_and_management_plan_planit_figures_5-8.pdf | Referral attachment | 002118276 | 0.1 | 22/12/2017 13:48 |
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| Att A | 2017-8134 Referral-Attach-preclearing_fauna_assessment_and_management_plan_planit_part_2.pdf | Referral attachment | 002118284 | 0.1 | 22/12/2017 13:48 |
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| Att A | 2017-8134 Referral-Attach-preclearing_fauna_assessment_and_management_plan_planit_part_4.pdf | Referral attachment | 002118290 | 0.1 | 22/12/2017 13:49 |
| Att A | 2017-8134 Referral-Attach-preclearing_fauna_assessment_and_management_plan_planit_part_5.pdf | Referral attachment | 002118273 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-vegetation_management_plan_planit_2014.pdf | Referral attachment | 002118252 | 0.1 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-vegetation_management_plan_planit_2014_figures.pdf | Referral attachment | 002118211 | 0.1 | 22/12/2017 13:48 |
| Att B | 2017-8134 Referral-request to vary action.pdf | Variation request | | 0.3 | 8/05/2018 10:33 |
| Att C | 2017-8134 Variation request-decision-EPBC excerpts.pdf | EPBC Act and EPBC Regulations excerpts | | 0.2 | 17/05/2018 16:56 |
| Att D | 2017-8134 Variation request-variation notice docx | For signature - decision notice | 001294594 | 0.3 | 14/05/2018 14:27 |
| Att E | 2017-8134 Variation request-decision letter-proponent.docx | For signature - letter to Polaris Coomera Pty Ltd | 001294808 | 0.4 | 17/05/2018 16:44 |
| Att E | 2017-8134 Variation request-decision letter-qld.docx | For signature - letter to QLD Government | 001294808 | 0.2 | 17/05/2018 16:43 |

FOI 180918
Document 3f

**DEPARTMENT OF THE ENVIRONMENT AND ENERGY**

**To:** James Barker, Assistant Secretary, Assessments and Governance Branch, (for decision)

**Variation of proposal to take an action—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland (EPBC 2017/8134)**

**Timing:** 7 June 2018 – statutory timeframe.

**Recommendations:**

1. Consider the information in this brief and attachments.

**Considered / Please discuss**

2. Agree to accept the varied proposal to take an action under section 156B of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

**Agreed / Not agreed**

3. If you agree to Recommendation 2, indicate that you accept the reasoning in the Departmental briefing package as the basis for your decision.

**Accepted / Please discuss**

4. Sign the notice at Attachment D, which will be published if you accept the variation.

**Signed / Not signed**

5. Sign the letters at Attachment E, advising the person proposing to take the action and the Queensland Government of your decision.

**Signed / Not signed**

**James Barker**
**Assistant Secretary**
**Assessments and Governance Branch:** **Date:**

**Comments:**

**Background**

1. A referral was received on 22 December 2017 from Polaris Coomera Pty Ltd (person proposing to take the action) to develop a residential master planned community supporting medium and high density residential uses with integrated open space and conservation areas in Coomera, Queensland (proposed action). A copy of the referral is at Attachment A.

2. On 7 May 2018, the Department received a request from Polaris Coomera Pty Ltd to vary the proposed action under section 156A of the EPBC Act (Attachment B). On 10 May 2018, Polaris Coomera Pty Ltd paid the cost recovery fee associated with the request.

**Assessment**

3. Variation requests can only be made under certain circumstances. An excerpt of the requirements under the EPBC Act is at Attachment C. In this instance, as the proposed action has been referred under Division 1 of Part 7, no decision has been made under section 74A to not accept the referral, and no decision has been made on whether the proposed action is a controlled action and which provisions of Part 3 (if any) are controlling provisions, the Department considers the request can be made.

4. Requests must also be made in the way and must include the information prescribed by the *Environment Protection and Biodiversity Conservation Regulations 2000* (EPBC Regulations). An excerpt of the requirements is at Attachment C. The Department considers the request meets those requirements.

5. Under section 156B of the EPBC Act you must not decide to accept the varied proposal unless you are satisfied that the character of the varied proposal is substantially the same as the character of the original proposal. In considering this you must have regard to the change (if any) in the nature of the activities proposed to be carried out in taking the action, and the nature and extent of the impacts (if any) the action has or will have, or is likely to have on the matter protected by each provision of Part 3 of the EPBC Act.

6. The original proposal was to develop a residential development over a 147 hectare site and included activities such as land clearing, construction of dwellings, retail and commercial precincts and associated infrastructure and services.

7. The varied proposal proposes the same residential development on the same site and includes the same activities as the original proposal but excludes the clearing of 1.5 hectares of vegetation along the northern boundary of the site. The proposed exclusion of this clearing has been made on the basis that this vegetation poses a safety hazard and fire risk to neighbouring properties and needs to be cleared in advance of taking the proposed action.

8. Given this, the Department considers that the character of the varied proposal is substantially the same as the character of the original proposal and the nature of the activities proposed to be carried out in taking the action is similar.

9. The variation request considers no additional protected matters beyond those potentially impacted by the original proposal would be affected as a result of the varied proposal. The Department considers that the varied proposal will only slightly reduce the amount of clearing associated with the proposed action and the nature and extent of the impacts are similar to the original proposal.

**Recommendation**

10. Based on the information in this brief and attachments, the Department recommends that you accept the varied proposal to take an action in accordance with section 156B of the EPBC Act.

11. If you agree, the Department recommends you sign the variation notice at Attachment D and the letter at Attachment E advising Polaris Coomera Pty Ltd of your decision.

12. If you accept the varied proposal, the Department also recommends you inform the appropriate Queensland Minister of your decision. A letter to the Queensland Minister for Environment and the Great Barrier Reef, Minister for Science and Minister for the Arts, is at Attachment E.

13. If you agree to accept the varied proposal, the variation request and the notice of your decision will be published on the Department's website.

s22
A/g Director
Queensland South and Sea Dumping Section
Phone: (02) s22
May 2018

s22
Queensland South and Sea Dumping Section
Phone: (07) s22

**Attachments**

A: Referral

B: Variation request

C: EPBC Act and EPBC Regulations excerpts

D: Decision notice—FOR SIGNATURE

E: Letters to Polaris Coomera Pty Ltd and the Queensland Government—FOR SIGNATURE

Australian Government
Department of the Environment and Energy

**Notification of**

**VARIATION OF PROPOSAL TO TAKE AN ACTION**

**Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland (2017/8134)**

This decision is made under section 156B of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

**Proposed action**

| | |
|---|---|
| **person proposing to take the action** | Polaris Coomera Pty Ltd<br><br>ACN: 130 648 056 |
| **original proposed action** | To develop a residential master planned community supporting medium and high density residential uses with integrated open space and conservation areas located in Coomera, Queensland [see EPBC Act referral 2017/8134]. |
| **varied proposed action** | To develop a residential master planned community supporting medium and high density residential uses with integrated open space and conservation areas located in Coomera, Queensland [see EPBC Act referral 2017/8134 and variation request dated 4 May 2018]. |
| **decision** | The varied proposal to take an action is accepted and takes effect from the date of this notice. |

**Person authorised to make decision**

| | |
|---|---|
| **name and position** | James Barker<br>Assistant Secretary<br>Assessments and Governance Branch |
| **signature** | |
| **date** | / / 2018 |

Australian Government
Department of the Environment and Energy

EPBC Ref: 2017/8134

Kaeko Omura
Managing Director
Polaris Coomera Pty Ltd
PO Box 105
SURFERS PARADISE QLD 4217

Dear Kaeko Omura

**Decision on variation of proposal to take an action—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland**

I am writing to you in response to your letter dated 4 May 2018 requesting a variation of your above proposal under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). As a delegate of the Minister for the Environment and Energy, I have decided to accept the varied proposal. A copy of the notice recording this decision is attached. This document, along with your request, will be published on the Department's website.

As a result of my decision, the provisions of Chapter 4 of the EPBC Act that ceased to apply in relation to the original proposal start to apply in relation to the varied proposal and for the purpose of the application of those provisions, anything done in relation to the original proposal is taken to have been done in relation to the varied proposal.

If you have any questions about this decision, please contact the project manager, s22 by email to s22 @environment.gov.au, or phone 07 s22 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

James Barker
Assistant Secretary
Assessments and Governance Branch

/ / 2018

EPBC Ref: 2017/8134

s22
Director
Impact Assessment and Operational Support
Department of Environment and Science
GPO Box 2454
BRISBANE QLD 4001

Dear s22

**Decision on variation of proposal to take an action—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland**

I am writing to you as delegated contact for the Hon Leeanne Enoch MP, Queensland Minister for Environment and the Great Barrier Reef, Minister for Science and Minister for the Arts, regarding a request by Polaris Coomera Pty Ltd to vary their above proposal under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

As a delegate of the Minister for the Environment and Energy, I have decided to accept the varied proposal. A copy of the notice recording this decision is attached. This document, along with the request, will be published on the Department's website.

As a result of my decision, the provisions of Chapter 4 of the EPBC Act that ceased to apply in relation to the original proposal start to apply in relation to the varied proposal and for the purpose of the application of those provisions, anything done in relation to the original proposal is taken to have been done in relation to the varied proposal.

If you have any questions about this decision, please contact the project manager, s22 by email to s22@environment.gov.au, or phone 07 s22 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

James Barker
Assistant Secretary
Assessments and Governance Branch

/ / 2018

# Polaris Coomera Pty. Ltd.

Planning and Development

18 January 2018

Attn: Mr James Barker
Department of the Environment and Energy
Assistant Secretary
Assessments and Governance Branch
Environment Standards Division
GPO Box 787
CANBERRA ACT 2601

Dear Mr Barker

**EPBC Act referral 2017/8134 - Referral of proposed action for Coomera Woods Master Planned Development**
**Polaris Coomera Pty Ltd**

We refer to discussions today between ourselves and s22 and the email from s22 to Planit Consulting and ourselves of 16 January 2018.

We understand that you are giving consideration to whether the action that has been referred for the development of Coomera Woods should be regarded as part of a larger action that is proposed to be taken for the purposes of s.74A of the *Environment Protection and Biodiversity Conservation Act 1999* (**Act**).

As indicated in our discussion with s22 we consider that the referred action is not part of a larger action and should not be considered by the Department as such. Relevantly, there is no current intention to develop that portion of land that we understand has given rise to consideration of whether the action is part of a larger action. If necessary, we are able to provide additional information to assist the Department to understand that the development of that portion of land is not part of the current development activities intended to be undertaken. Since changes were made to the proposed Coomera Woods development to exclude that portion of land from the proposed development, no decision has been made by Polaris as to how that land will be used, including whether it will be retained in its current state, developed, or sold.

If you are not satisfied on the information that has been provided with the referral that the referred action is not part of a larger action, we would request an opportunity to provide you with further information. We would be agreeable to suspending the running of time for the making of the decision on the referral (either under s.75(6) or (7) of the Act) for the purpose of allowing the further information to be taken into account.

Polaris Coomera Pty Ltd
Level 4, 9 Beach Road / PO Box 105, Surfers Paradise QLD 4217
TEL: (07) 5592 5890 FAX: (07) 5526 2574
ACN: 130 648 056 ABN: 36 130 648 056

We also note that even if the referred action were to be considered part of a larger action (which we consider is not the case), there has been sufficient information provided with the referred action to assess the impact of that larger action (see step 3 of the Department's policy statement with respect to staged developments and the exercise of s.74A). The information that has been provided in relation to the koala, for instance, addresses the impact on the koala with respect to the land on which the development is currently intended to be undertaken together with that portion of land that is excluded from the development.

We look forward to receiving confirmation that the Department will continue to consider the referred action and will not refuse to accept the referral under s.74A, or, in the alternative, that you will agree to suspend the running of time to make a decision on the referral to allow us to provide you with further information to demonstrate that the referred action is not part of a larger action.

Yours faithfully

Kaeko Omura
Polaris Coomera Pty Ltd

3 April 2018

s22
Assessments and Governance Branch
Department of Environment and Energy
Email: s22

**Supplementary Species Assessment Report – Polaris Coomera Pty Ltd - Coomera Woods Master Planned Development (EPBC 2017/8134)**

Dear s22 ,

We refer to your correspondence dated 16 March 2018 requesting further detail into surveys carried out within Coomera Woods and surrounding areas.

We note that spotlighting is considered the most commonly used survey method for nocturnal arboreal mammals as recommended by the *Survey Guidelines for Australia's Threatened Mammals Guidelines* under the EPBC Act.

Below we have provided a summary on the Greater Glider including important habitat feature requirements and the surveys that have been performed over the Coomera Woods site and surrounding areas over the last 15 years. Table 3 has been provided to list the relevant survey details, specifically those details that relate to arboreal mammals.

**Greater Glider (*Petauriodes Volans*)**
The greater glider is an arboreal nocturnal marsupial, largely restricted to eucalypt forests and woodlands. It is primarily folivorous, with a diet mostly comprising eucalypt leaves, and occasionally flowers (Kehl & Borsboom 1984; Kavanagh & Lambert 1990; van der Ree et al., 2004). It is typically found in highest abundance in taller, montane, moist eucalypt forests with relatively old trees and abundant hollows (Andrews et al., 1994; Smith et al., 1994, 1995; Kavanagh 2000; Eyre 2004; van der Ree et al., 2004; Vanderduys et al., 2012).

During the day it shelters in tree hollows, with a particular selection for large hollows in large, old trees (Henry 1984; Kehl & Borsboom 1984; Lindenmayer et al., 1991; Smith et al., 2007; Goldingay 2012). In Grafton/Casino, Urbenville and the Urunga/Coffs Harbour Forestry Management Areas (FMAs) in northern New South Wales (NSW), the abundance of greater gliders on survey sites was significantly greater on sites with a higher abundance of tree hollows (Andrews et al., 1994; Smith et al., 1994, 1995). In the Grafton/Casino FMA, the greater glider was absent from surveyed sites with fewer than six tree hollows per hectare (Smith et al., 1994). In southern Queensland, greater gliders require at least 2–4 live den trees for every 2 ha of suitable forest habitat (Eyre 2002).

The species has not been recorded on site during various detailed ecological assessments undertaken on site. The habitat features and requirements for this species are considered largely absent from the referral site and that of the surrounding areas. Scat analysis for the site and surrounding properties were conducted during surveys of each property.

The surveys conducted by Planit and Saunders Havill Group have been conducted over a 15 year period are detailed within Table 3 below.

As discussed within our previous correspondence dated 8 March, the species was not recorded during the nocturnal surveys during the most recent surveying efforts associated with the most recent EPBC referral.

In addition to the ecological assessments performed within the referral site, Planit Consulting also performed detailed ecological surveys on numerous surrounding properties which have included surveying for nocturnal and arboreal mammals. The Greater Glider was not identified during any of the detailed surveys of the surrounding sites. The surrounding areas surveyed are shown within the figure below.

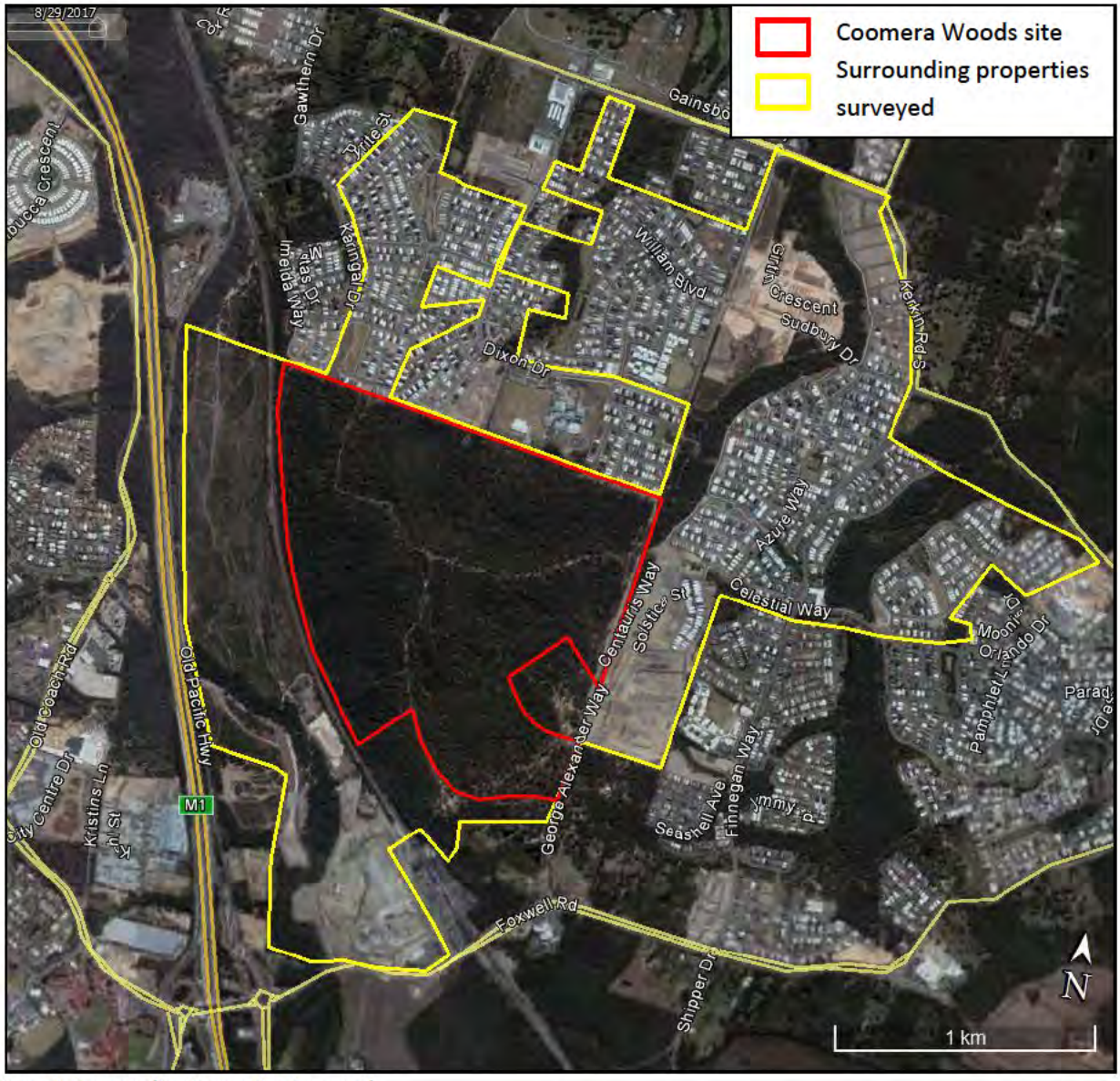



**Figure 1: Surrounding Properties Surveyed.**

**Table 1: Ecological Surveys of surrounding properties**

| Development/Property | Survey Date/s |
|---|---|
| Bloom Estate (formally Big Sky) | Stage 10: 14 & 15 October 2009<br>Stages 4 & 9: 24 & 27 May 2010<br>Stages 5-8: 11 & 12 March 2010 |
| The Meadows Estate | June – November 2003 |
| Karingal Drive Precinct | January 2007 |
| Gainsborough Park Woodlands | April – May 2004 |
| Coomera Centre Commercial Park (Lot 1/SP209027) | Initial Surveys: November 2003 – May 2004<br>Additional surveys: February – March 2008 |
| Polaris Residential Estate (Lot 2/SP165374) | Initial Surveys: November 2003 – May 2004<br>Reviewed Ecological Assessment & VMP: July 2015 |
| Coomera Town Centre | November 2003 – May 2004 |

The total area surveyed including the Coomera Woods site equates to approximately 550ha. This surveying over a significant time period and potential habitat area failed to record the Great Glider. The initial surveys undertaken in the locality were performed prior to any urban development. The surveys were performed across a range of seasons and weather conditions. The surveys performed within the surrounding properties have also been detailed within the table below.

It is noted that the *Survey Guidelines for Australia's Threatened Mammals Guidelines* under the EPBC Act does not directly list survey techniques for the Greater Glider as the Great Glider listing came into effect after the publication of this document.

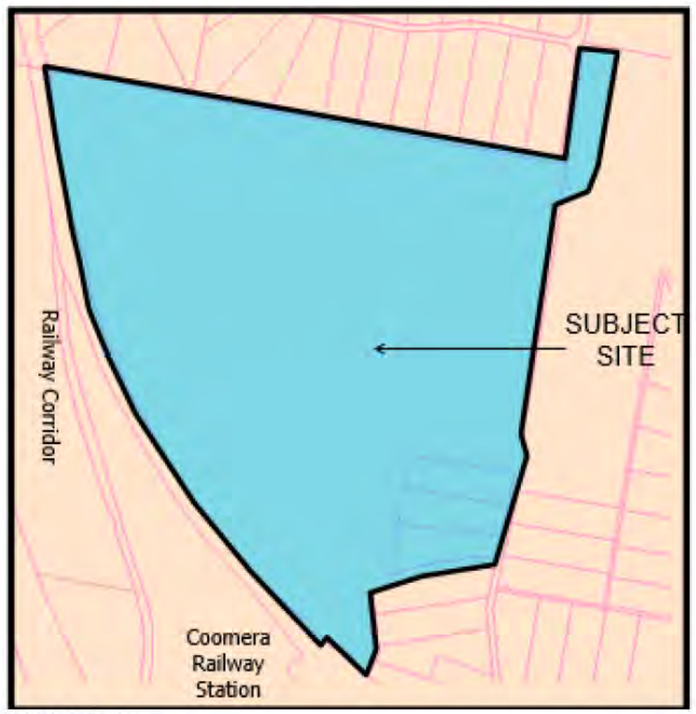
However, based on the requirements for other arboreal mammals and in particular glider species, it is considered that spotlighting is the most commonly used method to detect such species. A number of the surveys conducted within the Coomera Woods site and surrounding areas incorporated this technique and specific searches for arboreal mammals. The diurnal searches for signs of foraging and investigation of hollowbearing trees is another survey technique recommended to determine presence and habitat suitability for Glider species, which are commonly used techniques within the surveys detailed below.

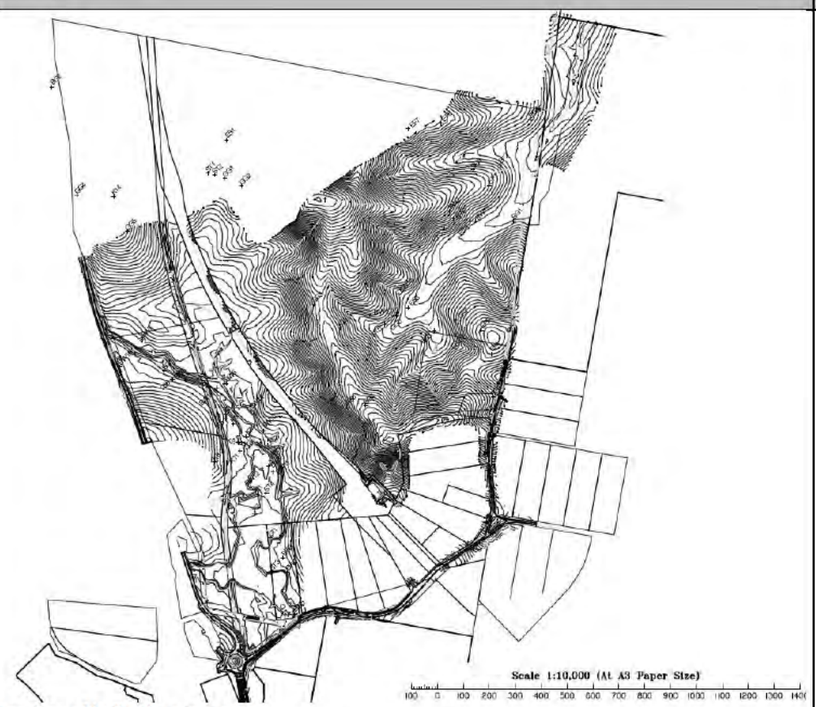
All surveying completed by Planit Consutling over the 15 year period has been performed by suitably qualified ecologists with the appropriate licences and permits.

**Table 2: Current Planit Consulting Licences & Permits**

| Authority | Licence/permit | Title | Expiration | Permit No. |
|---|---|---|---|---|
| QLD EPA/DEHP | Scientific Purpose Permit | Wildlife Research | 7 August 2019 | WISP14894214 |
| QLD DEEDI Animal Ethics | Scientific Use Registration | Scientific Use Registration | 14 February 2021 | Reg No. SUR000241 |
| QLD DAFF Animal Ethics | Community Access AEC | Fauna Surveying | 14 Feb 2021 | CA 2018/03/1168 |
| QLD DEHP | Rehabilitation Permit NC(Administration)R 2006 | Observe or relocate protected animals | 17 May 2019 | WIRP12736113 |

**Table 3: Relevant Ecological Assessments/Surveys**

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| Ecological Assessment for Coomera Woods, Planit Consulting, 2004. | Initial Surveys of the Coomera Woods site began in November 2003. The surveying details and methodology area summarised below.<br><br>**Survey period:** November 2003 – May 2004<br><br>**Number of fauna surveys:** 4 (1 x diurnal meander, 1 x nocturnal meander, 1 x call playback, 1 x trapping) Minimum 2 nights to complete nocturnal surveys.<br><br>**Weather Conditions:** Varying over the survey period. Temperature and rainfall was not recorded.<br><br>**Season:** Summer - Autumn<br><br>**Surveyor:** Planit Ecologist<br><br>**Location:** Incorporated the following allotments which front Cunningham Drive in Coomera;<br>• Lot 401 on RP862285<br>• Lots 77-79 on RP187881<br><br>  <br>**Subject Site Locality**<br><br>**Surveying Methodology:**<br>To classify and identify faunal populations and species which occur or may occur on site, the following methodology was applied:<br>• Literature review of previous surveys undertaken within the general locality including the following: | Arboreal mammals were recorded within the subject site. The Greater Glider was not observed during the surveying period or recorded through scat analysis.<br><br>The habitat value for hollow-dependent arboreal mammals was considered low due to the paucity (<1/8ha) of scenescent trees supporting hollows. Spotlighting and trace analysis efforts over the site resulted in the recording of the following species:<br><br>• Brushtail Possum<br>• Sugar Glider<br>• Feathertailed Glider<br><br>These species were occasionally encountered during nocturnal survey in proximity to the available hollowbearing trees.<br><br>No other arboreal mammals were recorded on site during the survey period with the presence of the Ringtailed Possum and Squirrel Glider considered a potential occurrence based on available habitat. Survey for additional arboreal mammals included the following:<br><br>• Spotlighting<br>• Stagwatching (of dead and hollow bearing trees)<br>• Owl call playback for mammal response<br>• Glider playback<br><br>Despite the above intensive survey works no additional arboreal mammal activity was recorded. | N/A |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | ○WBM (1997) *Environmental Impact Study Volume 2: Coomera Woods an Integrated Major Regional Town Centre*. WBM, Brisbane.<br>○Chenoweth EPLA (2001) *Coomera Town Centre Local Area Plan Environmental Management Strategy*. Chenoweth EPLA, Brisbane.<br>• Field survey of the flora communities located within and immediately adjacent to the study area to determine habitat values;<br>• Study teams' experience and knowledge of the study area and protected flora and fauna;<br>• The following detailed fauna field survey methods were implemented during the months of November 2003-May 2004 in general accordance with the following:<br>- Gold Coast City Council (2002) *Guidelines for Preparing Ecological Site Assessments During the Development Process: Planning Scheme Policy*. GCCC, Nerang.<br>- Department of Environment and Heritage (1999) *Suggested Conservation Criteria for Development Assessment*. DEH, Brisbane.<br>- Shire of Maroochy (1997) *Flora and Fauna Assessment Requirements for Developments in Maroochy Shire*. M.S.C<br>- Department of Land and Water Conservation (1997) *Interim Guidelines for Targeted and General Flora and Fauna Surveys under the Native Vegetation Conservation Act 1997*. NSWDLWC, Parramatta.<br>- Brisbane City Council (1999) *Ecological Assessment Guidelines*. B.C.C.<br>- NSWNPWS (2001) *The Community Biodiversity Survey Manual*. New South Wales National Parks & Wildlife Service.<br><br>All field survey was performed under the provisions of 'Scientific Purposes Permit for Fauna Trapping' (issued by Queensland Parks and Wildlife Service) and Animal Ethics Committee approval ('Scientific Survey of Fauna Species' issued by Bribie Local Animal Ethics Committee, Queensland Department of Primary Industries).<br><br>***Diurnal Survey***<br>• Active searches were conducted for key habitat components and potential macro and micro habitat components for rare and threatened species;<br>• Binocular search and identification of all fauna heard or sighted;<br>• Opportunistic sightings/audible identifications were conducted and recorded whilst all survey works were being undertaken;<br>• Detailed ground track/trace survey was performed including:<br>○ Scat/pellet examination<br>○ Scratch/trace examination of trees<br>○ Diggings, burrow, trace and track examination<br>○ Humus/crevice examination<br>○ Examination and assessment of tree hollows, hanging bark, termite mounds, flowering and nesting trees<br>• Trapping for fauna was performed in accordance with QPWS and DPI approvals issued to Planit Consulting. Type 'A' Elliot traps, Pitfall traps and McQuade open wire traps were utilised. Traps were set at varying of intervals of 10-20 metres depending on the habitat complexity within the surveyed vegetation remnant. It is reiterated that very limited habitat for smaller ground dwelling species occurs on the subject site.<br>Traps remained in place for between 36 and 48 hours and were checked and emptied (where necessary) every eight hours. Traplines were replicated twice across the survey period. Baits utilised |  <br>**Location of hollowbearing trees**<br><br>**Statistical Analysis:**<br>There is no statistical analysis. This ecological study establishes the presence, potential occurrence or absence of fauna species. The Greater Glider was not recorded. | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | within the traps included rolled oats & golden syrup, rolled oats & peanut butter, dog biscuits, tuna, banana, apple, sunflower seed mix, wombaroo insectivore mix and chicken. In addition, selected baits were laced with aniseed or vanilla essence.<br><br>***Nocturnal Survey***<br>Nocturnal survey was performed during varying lunar and weather conditions (including crepuscular cycles) and included the following survey techniques:<br>• Audible survey for calls, scratching and landings;<br>• Trapping for fauna as described above;<br>• Spotlighting focusing on flowering and senescent trees, vegetated corridors, drainage lines, open grassland and canopy breaks utilising:<br>• Short duration-long distance white light, and<br>• Long duration-short distance red light<br>• Naked eye observation utilising dawn/dusk/moon light for bats and fauna returning to potential nest/shelter areas. Night sky silhouetting from forest fringes was specifically utilised to locate mega and microchiropteran bats;<br>• Amplified call recording/playback for Arboreal mammals. Playback of pre-recorded calls included the following species:<br>- Koala (*Phascolarctos cinereus adustus)*<br>- Yellow-bellied Glider (*Petaurus australis*)<br>- Sugar Glider (*Petaurus breviceps*)<br>- Squirrel Glider (*Petaurus norfolcensis*)<br><br>***Habitat Assessment***<br>Prior to the commencement of the abovementioned survey works on site a broad habitat assessment was conducted. The purpose of this overview was to determine which species were likely to be present based on available habitat components and to target areas for detailed surveying of protected fauna species. The site incorporated the following habitat components as a result of previous landuse, vegetation types (refer Section 3), surrounding uses and hydraulic regime:<br>• Low habitat is available for ground-dwelling fauna as a result of previous clearings, impediments to movements and ongoing slashing. Most areas contained reduced values with a sparse cover of grasses and leaf litter;<br>• High edge to area ratio of remnants increasing opportunity for transient, aggressive species on road frontages and within the open areas created through previous/ongoing clearing;<br>• Moderate seasonal forage values including nectar, seed, insects and foliage are available. A very low abundance of suitable fruiting species for frugivores is present;<br>• Low numbers of suitable mature/post mature Eucalypt species incorporating hollows are present within the site.<br><br>**Survey Limitations:**<br>This survey did not target the Greater Glider, however arboreal mammals were the target species. It is considered likely that if the Greater Glider was present, this survey would have recorded the species. | | |
| Updated Ecological Assessment, Coomera Woods, Cunningham Drive, Coomera, Planit Consulting, March 2008 | Additional Surveys were performed in 2008 within Coomera Woods to update ecological information gathered within the initial surveys.<br><br>**Initial survey period**: November 2003 – May 2004<br><br>**Updated diurnal survey and koala searches period:** February – March 2008<br><br>**Number of fauna surveys:** (1 x diurnal meander, 1 x nocturnal meander, 1 x call playback, 1 x trapping) Minimum 2 nights to complete nocturnal surveys | Arboreal mammals were recorded within the subject site. The Greater Glider was not observed during the surveying period or recorded through scat analysis.<br><br>A total of eighteen (18) mammal species or evidence of their previous existence were recorded on the subject site. One mammal listed as regionally vulnerable within the *Nature Conservation (Wildlife) Act 1992* was observed on site. Review of WILDNET (2008) data indicates the presence of one (1) additional rare and threatened species within the sub-region (5-kilometre radius). | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|

**Weather Conditions:** Varying over the survey period. Temperature and Rainfall was not recorded.

**Season:** Summer - Autumn

**Surveyor:** Planit Ecologists

**Relevant Licences:**

| Authority | Licence/permit | Title | Permit No. |
|---|---|---|---|
| EPA/QPWS | Scientific Purpose Permit | Wildlife Research | WISP03727506 |
| QLD DPI&F | Scientific Use Registration | Scientific Use Registration | 06/02204 |
| QLD DPI&F Animal Ethics | Community Access AEC | Environmental Studies- Fauna Survey for Scientific Purposes | CA 2006/03/112 |

**Location**: Part Lot 44 on SP207822 & Part Lot 1 on SP165374


**Subject Site Location**

**Surveying Methodology**

To classify and identify faunal populations and species which occur or may occur on site, the following methodology was applied:

- Literature review of previous surveys undertaken within the general locality including the following:
  - Chenoweth EPLA (2001) *Coomera Town Centre Local Area Plan Environmental Management Strategy*. Chenoweth EPLA, Brisbane.
- Review of Wildnet Data;
- Field survey of the flora communities located within and immediately adjacent to the study area to determine habitat values;
- Study teams' experience and knowledge of the study area and protected flora and fauna;

Arboreal mammals previously noted to occur within the vicinity of the site are all noted to be hollow dependent with the exception of the Koala and the Ringtail Possum (which does utilize hollows but will also construct leaf dreys) (Strahan eds, 2002; Gibbons and Lindenmayer, 2002). It is widely accepted that a reduction in senescent trees is a limiting factor in hollow dependent arboreal mammal populations (Smith and Lindenmayer, 1998; Gibbons and Lindenmayer, 2002; Lindenmayer, 2002; Lunney, 1987).

Within the site there exists a general scattering of hollow bearing trees (HBT) which are stocked at a recorded rate of ~0.16-17 HBT/ha (it is acknowledged that additional trees with small/key hole hollows that are not readily visible at ground level may occur). This figure is considered to be well below mean habitat tree range (5.9 +/- 0.4 habitat trees/ha) for Coastal Dry Sclerophyll Forests (Ross, 1999).

The habitat value for hollow-dependent arboreal mammals is considered moderate due to the presence of numerous mature Eucalypts, extensive woodland and occasional senescent trees supporting hollows. Spotlighting and trace analysis efforts over the site resulted in the recording of the following species:

- Brushtail Possum
- Sugar Glider
- Squirrel Glider
- Feather-tailed Glider

No other arboreal mammals were recorded on site during the survey period with the presence of the Ring-tailed considered a potential occurrence based on available habitat. Survey for additional arboreal mammals included the following:

- Spotlighting
- Stagwatching (of dead and hollow bearing trees)
- Owl call playback for mammal response

Despite the above survey works no additional arboreal mammal activity was recorded.

**Statistical Analysis**:

This survey recorded the hollowbearing trees within the site and determined the rate to be approximately 0.16-0.17 per hectare, which is considered to be below mean habitat tree range for Coastal Dry Sclerophyll Forests.

This ecological study only establishes the presence, potential occurrence or absence of fauna species. The Greater Glider was not recorded.

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|

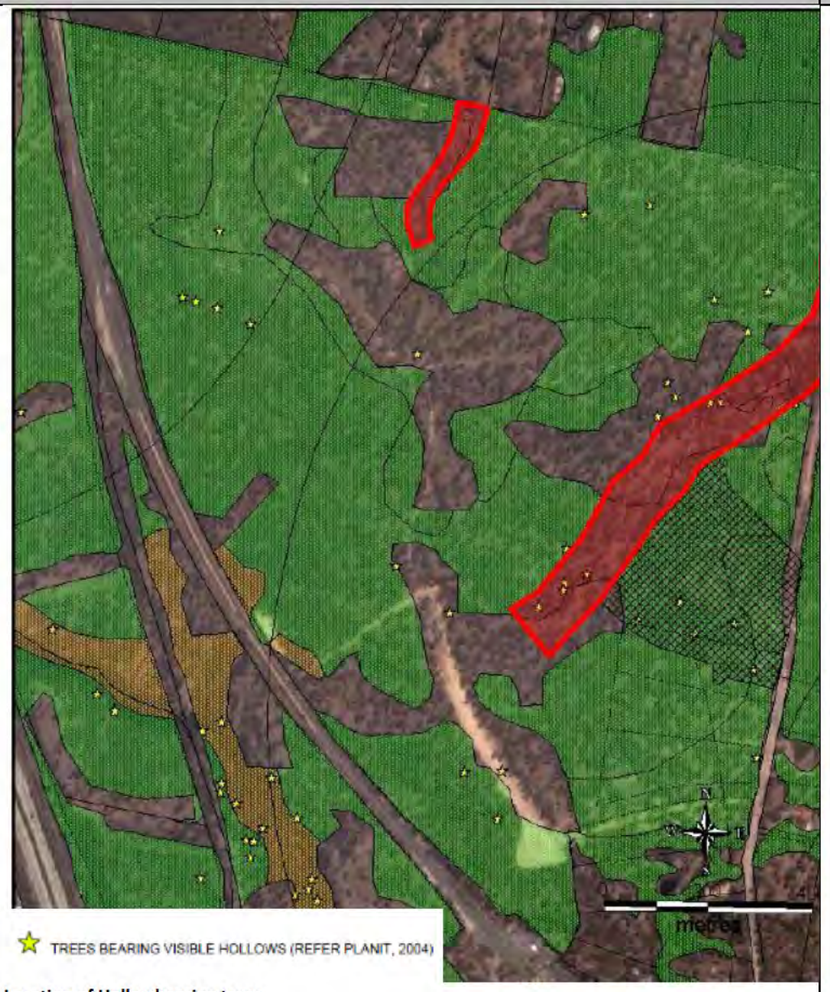
- The following detailed fauna field survey methods were implemented during the months of November 2003-May 2004 with updated diurnal survey and koala searches in February-March 2008 in general accordance with the following:
  - Gold Coast City Council (2002) *Guidelines for Preparing Ecological Site Assessments During the Development Process: Planning Scheme Policy*. GCCC, Nerang.
  - Department of Environment and Heritage (1999) *Suggested Conservation Criteria for Development Assessment*. DEH, Brisbane.
  - Shire of Maroochy (1997) *Flora and Fauna Assessment Requirements for Developments in Maroochy Shire*. M.S.C
  - Department of Land and Water Conservation (1997) *Interim Guidelines for Targeted and General Flora and Fauna Surveys under the Native Vegetation Conservation Act 1997.* NSWDLWC, Parramatta.
  - Brisbane City Council (1999) *Ecological Assessment Guidelines*. B.C.C.
  - NSWNPWS (2001) *The Community Biodiversity Survey Manual*. New South Wales National Parks & Wildlife Service.
  - Redland Shire's *Planning Scheme Policy 4-Ecological Impacts*

All field survey was performed under the provisions of 'Scientific Purposes Permit for Fauna Trapping' (issued by Queensland Parks and Wildlife Service) and Animal Ethics Committee approval ('Scientific Survey of Fauna Species' issued by Bribie Local Animal Ethics Committee, Queensland Department of Primary Industries).

**Diurnal Survey**

- Active searches were conducted for key habitat components and potential macro- and microhabitat components for rare and threatened species;
- Binocular search and identification of all fauna heard or sighted;
- Opportunistic sightings/audible identifications were conducted and recorded whilst all survey works were being undertaken;
- Detailed ground track/trace survey was performed including:
  - Scat/pellet examination
  - Scratch/trace examination of trees
  - Diggings, burrow, trace and track examination
  - Humus/crevice examination
  - Examination and assessment of tree hollows, hanging bark, termite mounds, flowering and nesting trees.
- Trapping for fauna was performed in accordance with permits issued to Planit Consulting. Type 'A' & 'B' Elliot traps and open wire traps (hook baited and foot paddle spring-loaded) of various sizes were utilised. Traps were set at intervals of approximately 10-20 metres depending on habitat complexity within the surveyed vegetation remnants. Traps remained in place for 96 hours and were checked and emptied (where necessary) every morning. Baits utilized within the traps included rolled oats & golden syrup, rolled oats & peanut butter, dog biscuits, tuna, banana, apple, sunflower seed mix, wombaroo insectivore mix, liver and chicken. In addition, selected baits were laced with aniseed or vanilla essence.

**Fauna Traps**




**Location of Hollowbearing trees**

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|

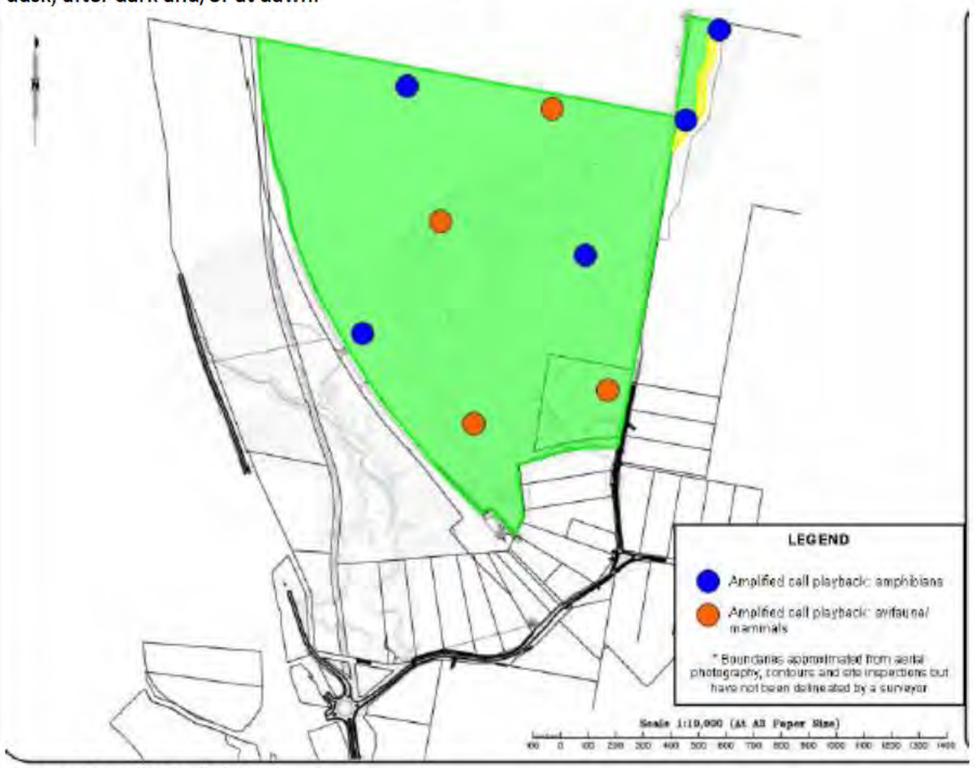
| | Elliot Traps | Cage Traps | Pitfall Traps* |
|---|---|---|---|
| No. of days per trap line | 4 | 4 | 4 |
| No. of replications across survey period | 4 | 4 | 4 |
| No. of traps per line | 20 | 2 | 5 |
| Total no. of trap nights | 1280 | 128 | 240 |


**Location of traps**

**Nocturnal Survey**

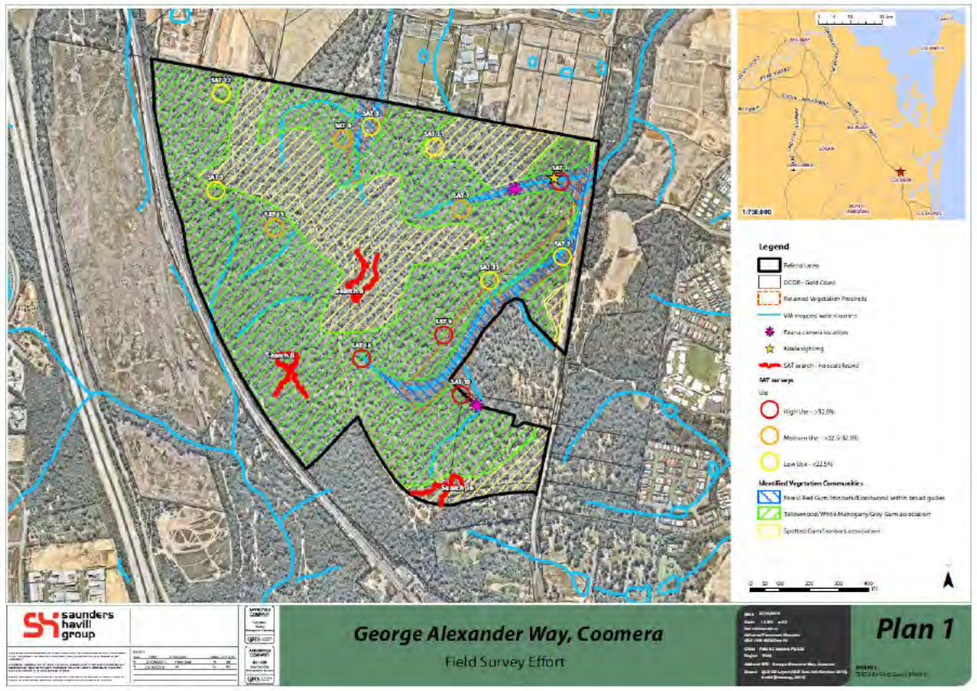
Performed during varying lunar and weather conditions (including crepuscular cycles) and included the following survey techniques:

- Audible survey for calls, scratching and landings;
- Trapping for fauna as described above;
- Spotlighting utilising:
  - Short duration-long distance white light, and
  - Long duration-short distance red light
- Naked eye observation utilising dawn/dusk/moon light for bats and fauna returning to potential nest/shelter areas.
- Amplified call recording/playback for arboreal mammals. Playback of prerecorded calls included the following species:
  - Koala (Phascolarctos cinereus adustus)
  - Yellow-bellied Glider (Petaurus australis)
  - Sugar Glider (Petaurus breviceps)
  - Squirrel Glider (Petaurus norfolcensis)

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | Calls were broadcast for approximately 5 minutes followed by a 10 minute listening period and spotlighting (for nocturnal species). Depending on the species targeted, call play-back was used at dusk, after dark and/or at dawn.<br>  <br><br>**Location of amplified call playback**<br><br>**Habitat Assessment**<br>Prior to the commencement of the abovementioned survey works on site a broad habitat assessment was conducted. The purpose of this overview was to determine which species were likely to be present based on available habitat components and to target areas for detailed surveying of protected fauna species. The site incorporated the following habitat components as a result of previous landuse, vegetation types (refer Section 3), surrounding uses and hydraulic regime:<br><br>• Limited habitat is available for ground-dwelling fauna as a result of previous clearings, impediments to movements and ongoing slashing. Most areas contained reduced values with a sparse cover of grasses and leaf litter. The highest structural diversity of the lower strata was restricted to the gully areas which are not regularly slashed;<br>• Extensive areas of eucalypt forest/woodland area available for typical dry sclerophyll species (particularly avifauna and koalas);<br>• High edge to area ratio of remnants increasing opportunity for transient, aggressive species on road frontages and within the open areas created through previous/ongoing clearing;<br>• High seasonal forage values including nectar, seed, insects and foliage are available due to extensive areas of eucalypt forest/woodland. A very low abundance of suitable fruiting species for frugivores is present;<br>• Low numbers of suitable mature/post mature Eucalypt species incorporating hollows are present within the site. | | |

<table>
<tr><th>Report / Author / Date</th><th>Survey Details</th><th>Survey Results</th><th>Fauna Spotter/catcher reports</th></tr>
<tr><td></td><td>Survey Limitations:<br>It is acknowledged that additional trees with small/key hole hollows that are not readily visible at ground level may occur.<br>This survey did not target the Greater Glider, however arboreal mammals were the target species. It is considered likely that if the Greater Glider was present, this survey would have recorded the species.</td><td></td><td></td></tr>
<tr><td>Ecological Technical Note – MNES Flora and Fauna, Coomera Woods, Saunders Havill Group, October 2015</td><td>Saunders Havill Group performed an Ecological Assessment to determine the presence/absence of MNES Flora and Fauna Species within the Coomera Woods site.<br><br>Survey Period: Four (4) Days, 15th-18th April 2015<br><br>Number of surveys: 3 (1 x general searches, 1 x detailed observational survey, 1 x SAT site survey)<br><br>Weather Conditions: Fine partly cloudy. Temperatures and Rainfall was not recorded.<br><br>Season: Autumn<br><br>Surveyor: SHG Ecologists<br>Report Prepared by: Keira Grundy & Angela Little<br>Report Checked by: Murray Saunders<br><br>Location: Part Lot 44 on SP207822 & Part Lot 1 on SP165374</td><td>Arboreal mammals were recorded within the subject site. The Greater Glider was not observed during the surveying period or recorded through scat analysis.<br><br><table><tr><th>Species</th><th>Common Name</th></tr><tr><td>Meliphaga lewinii</td><td>Lewin's Honeyeater</td></tr><tr><td>Manorina melanocephala</td><td>Noisy Minor</td></tr><tr><td>Platycercus adscitus</td><td>Pale headed Rosella</td></tr><tr><td>Podargus striqoides</td><td>Tawny Frogmouth</td></tr><tr><td>Macropus qiqanteus</td><td>Eastern Grey Kangaroo</td></tr><tr><td>Canis lupus familiaris</td><td>Dog (prints)</td></tr><tr><td>Phascolarctos cinereus</td><td>Koala</td></tr><tr><td>Corvus orru</td><td>Torresian Crow</td></tr><tr><td>Cracticus nigroqularis</td><td>Pied Butcherbird</td></tr><tr><td>Cracticus torquatus</td><td>Grey Butcherbird</td></tr><tr><td>Trichoglossus haematodus</td><td>Rainbow Lorikeet</td></tr><tr><td>Macropus rufogriseus</td><td>Red-necked Wallaby</td></tr><tr><td>Pseudocheirus peregrinus</td><td>Common Ringtail Possum (scats)</td></tr><tr><td>Rhinella marina</td><td>Cane Toad</td></tr><tr><td>Aquila audax</td><td>Wedge-tailed Eagle</td></tr><tr><td>Gymnorhina tibicen</td><td>Australian Magpie</td></tr><tr><td>Cacatua qalerita</td><td>Sulphur-Crested cockatoo</td></tr><tr><td>Coracina novaehollandiae</td><td>Black-faced Cuckoo-Shrike</td></tr><tr><td>Vanellus miles</td><td>Masked Lapwing</td></tr><tr><td>Lopholaimus antarcticus</td><td>Topknot Pidgeon</td></tr><tr><td>Centropus phasianinus</td><td>Pheasant Coucal</td></tr><tr><td>Neochmia temporalis</td><td>Red-browed Finch</td></tr><tr><td>Malurus melanocephalus</td><td>Red-backed Fairy Wren</td></tr><tr><td>Varanus varius</td><td>Lace Monitor</td></tr><tr><td>Wallabia bicolor</td><td>Swamp Wallaby</td></tr></table>Fauna List<br><br>Statistical Analysis:<br>There was no statistical analysis. This ecological study only establishes the presence, potential occurrence or absence of fauna species. The Greater Glider was not recorded.</td><td>N/A</td></tr>
</table>

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| |  **Subject Site Aerial**<br><br>These surveys were carried out to address EPBC issues in relation to potential Matters of National Environmental Significance, however, a focus was placed on Koalas as they are known to occur in the region. The survey effort is shown on Plan 1.<br><br>Survey activities undertaken on-site have included:<br>• General Searches & Species Identification – The site was walked to ensure all vegetation communities and species were recorded and identified. Particular attention was paid to any threatened species that were listed as possibly occurring on or within the vicinity of the application site and specific micro assemblages which may support these threatened species.<br>• Observational Survey – Detailed observational surveys of the vertebrate fauna present on or that may utilise the study area, including faunal lists and significance status of species under the Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) that includes the Japan – Australia Migratory Bird Agreement and the Bonn Convention; and Queensland's *Nature Conservation Act 1992* (NCA). M<br>• Surveys targeting Koala were conducted, including:<br>  • Direct observational surveys<br>  • SAT – The Spot Assessment Technique<br>  • Koala Food Tree habitat assessments as per Australian Koala Foundation guidelines | | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | • Identification – Identification of habitat values within the area relevant to terrestrial vertebrate fauna, including ecological corridors; and<br>• Description – A description of the major fauna habitats present<br>• Opportunistic searches and deployment of fauna cameras<br>  <br>**Fauna surveying efforts**<br>A fauna assessment was conducted in conjunction with the vegetation assessment over the application site and was designed to build on the knowledge of extensive surveys already completed by Planit Consulting and Biolink. The purpose of the survey was to identify habitat opportunities, observations of species presence and activity, and undertake targeted searches for actual usage by threatened and significant fauna species. It is noted that previous fauna assessment were also undertaken by Planit Consulting during November 2003 to May 2004 and again in February to March 2008 which reported results consistent with the 2015 survey.<br><br>Site specific observations are as follows:<br>• A Protected Mattes Search generated under the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) using a 10km radius of the site, identified forty-nine (49) threatened fauna listed under the provisions of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) are considered to have potential to occur within the vicinity of the application sites. None of these protected matters were observed on or in the vicinity of the site, with the exception of the observation of one (1) koala in the north-east portion of the site.<br>• A search of the Wildlife Online database using a 10km radius of the site, identified twenty-three (23) listed threatened fauna species protected under the Nature Conservation Act 1992 (Qld) (NCA) were considered to have potential to occur across the site. No specimens were observed at the time of assessment. Again, none of these species, with the exception of the Koala, were considered likely to occur. | | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | • The site's ability to support listed threatened fauna species which are generally highly sensitive, specialised and require particular habitat features is highly unlikely for the majority of the listed EPBC Act or NCA protected species.<br>• A number of common bird species were found to utilise the site as part of their broader home range, including the Noisy Miner, Rainbow Lorikeet, Torresian Crow, Magpies and Butcherbirds.<br>• Fauna cameras were deployed at two locations within drainage areas where it was considered likely that visitation for water would be high (refer Plan 1 for locations). The only fauna recorded were common bird species, including the Pale Headed Rosella (Platycercus adscitus) and Noisy Minor (Manorina melanocephala). See photos extracted from the videos below.<br>• A few small rocky areas were observed within the subject site close to the ridgelines contained little to no habitat value due to the absence of suitable overhangs, crevices or hollows.<br>• Survey did not locate any large or unusual nests associated with migratory, rare birds or birds of prey on site.<br><br>In April 2015, Senior Ecologists from Saunders Havill Group conducted field surveys in accordance with EPBC Act Guidelines for the Koala across the site with weather conditions fine and sunny. The purpose of the survey was to determine the level of Koala usage across the site and to assess the availability of suitable habitat. The assessment involved the following methods:<br>• Spot Assessment Technique (SAT) developed by Phillips and Callaghan (2011)<br>• Habitat Assessments<br>• Opportunistic searches<br><br>The SAT method is an assessment of Koala activity involving a search for any Koalas and signs of Koala usage. The SAT involves meandering transects in search of Koalas or Koala scats beneath trees. Once a Koala or scat is located, the associated habitat tree is identified and recorded as the centre of the SAT. The nearest tree is then identified and the same data recorded. The next closest tree is then assessed and so on until the 30 trees nearest to the original tree in a radial survey have been recorded. The number of trees showing evidence of Koalas is expressed as a percentage of the total number of trees sampled to indicate the frequency of Koala usage. Assessment of each tree involves a systematic search for Koalas in the canopy and Koala scats beneath the tree within 1 m radius of the trunk. After approximately 1 minute of searching for scats, the base of the trunk is observed for scratches.<br><br>**Survey Limitations:**<br>This survey did not target the Greater Glider, however arboreal mammals were the target species. It is considered likely that if the Greater Glider was present, this survey would have recorded the species. | | |
| Koala Assessment Report, Coomera Woods, Saunders Havill Group, January 2017 | Specific arboreal mammal/koala specific surveying was performed by Saunders Havill Group in 2016 to further address EPBC Act matters.<br><br>**Arboreal Mammal/Koala Specific survey period**: First Round of Strip Transects performed in June; Second Round of Strip Transects performed in August 2016.<br><br>**Number of surveys:** 4 (2 x Strip transect surveys, 1 x SAT site survey, 1 x camera traps)<br><br>**Weather Conditions:** Varying over the survey period. Temperatures and rainfall was not recorded.<br><br>**Season:** Winter<br><br>**Surveyor:** SHG Ecologists<br><br>**Location:** Part Lot 44 on SP207822 & Part Lot 1 on SP165374 | This study focused on the target arboreal mammal, koala. Two (2) koalas were observed within the subject site, however not within the strip transects and therefore could not be used statistically to derive a density or population estimate. The Greater Glider was not recorded during the strip transect surveys of Coomera Woods.<br><br>**Statistical Analysis:**<br>This ecological study only establishes the presence, potential occurrence or absence of fauna species. The Greater Glider was not recorded. | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|

**Subject Site Aerial**

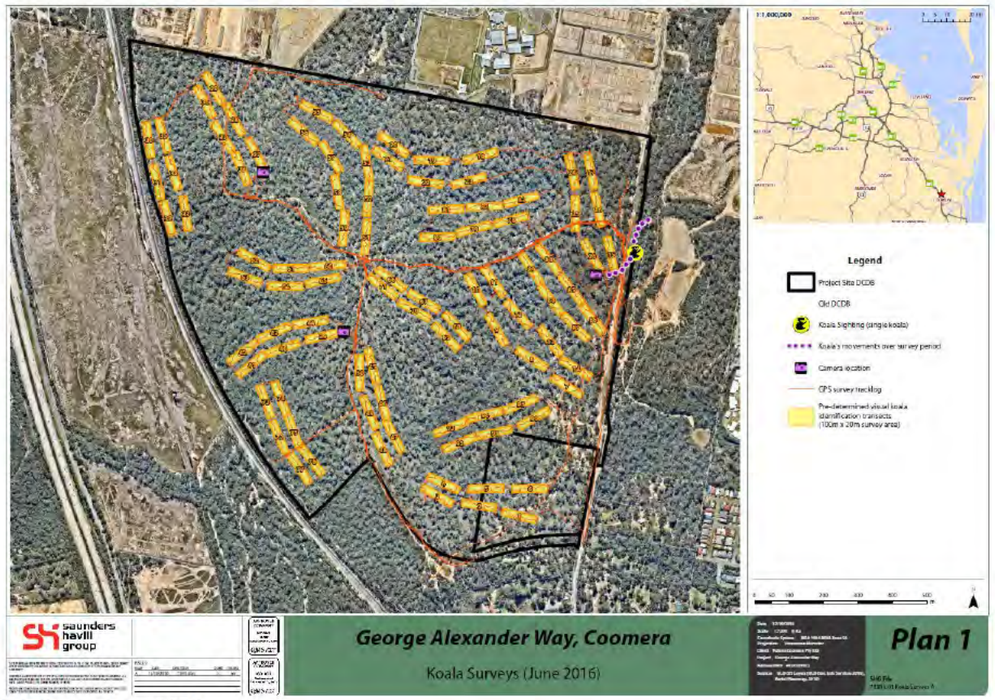
Koala specific surveys were undertaken by SHG as per relevant EPBC Act Guidelines over the project area. From15 to 18 April 2015, Senior Ecologists from **SHG** conducted field surveys across the site with weather conditions fine and sunny. The purpose of the survey was to determine the level of Koala usage across the site and to assess the availability of suitable Koala habitat. The assessment involved the following methods:

- Spot Assessment Technique (SAT) development by Philips and Callaghan (2011)
- Opportunistic Searches

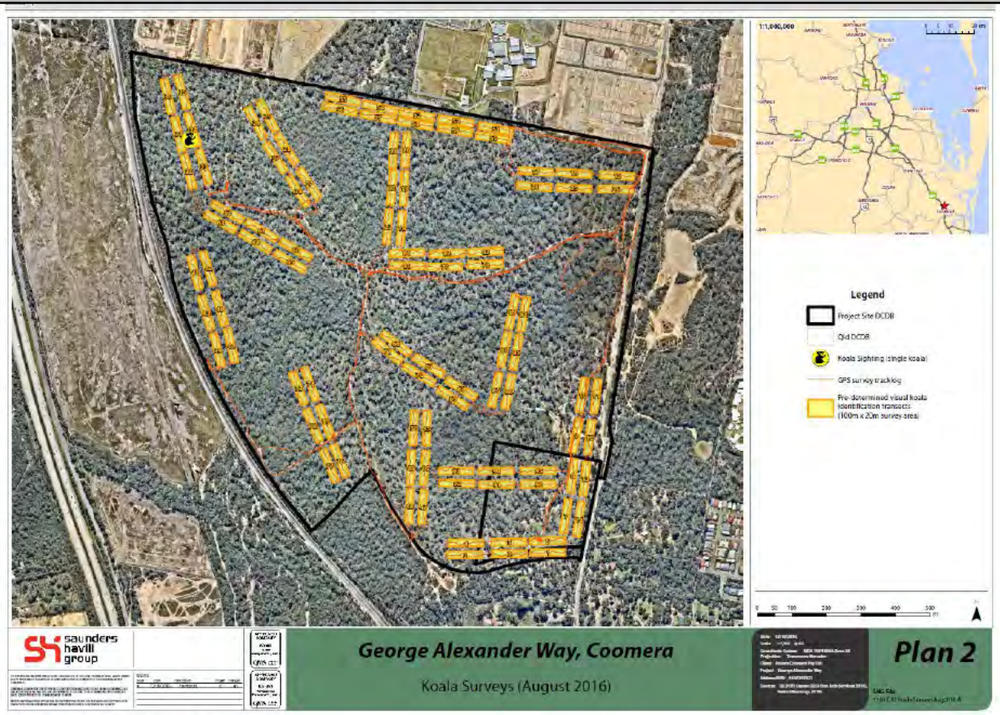
Site specific observations recorded the presence of one (1) relatively small juvenile Koala within the north eastern drainage line on only the first day of the four (4) day survey period. The animal was not sighted during any subsequent survey days, despite deliberate return searches on remaining days within proximity of the observation area. No other Koalas were observed during the referral application surveys.

**Survey Methodology:**

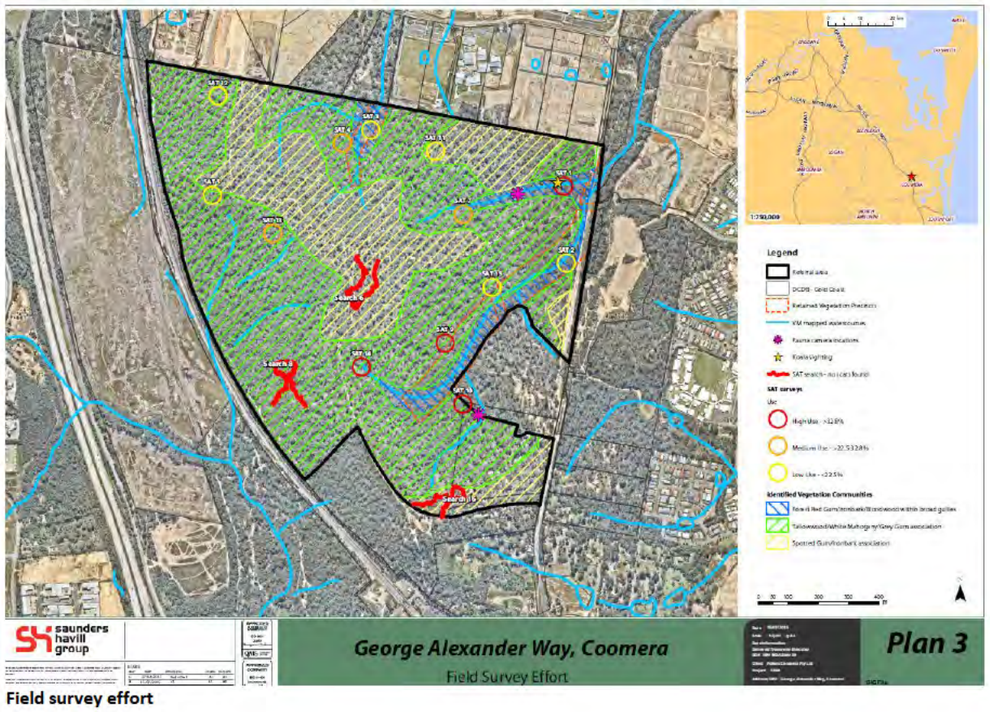
To complement primarily indirect surveys undertaken on-site in 2015, direct observational surveys based on the methodology of Dique et al. 2003 as per Koala Referral Guideline were applied over a period of five (5) days on two separate occasions (Surveys 1 and 2). The applied methodology involved two Ecologists searching all trees within 100 X 20 m polygons in parallel linearly stratified transects spaced so as to ensure the entire site was covered within the 5-day period. Habitat composition and the

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | presence or evidence (scats) of Koala was recorded within each polygon, however the primary focus was for the direct sighting of koalas via a census count of animals.<br><br>*Survey 1:*<br>All trees within a total of ninety-five (95) sample polygons spaced across the site were individually observed for the presence of Koala between 20 and 24 June, 2016 (refer **Plan 2**). It is noted this site survey occurred post the substantial clearing of the adjoining Bloom Estate to the direct east. An infrared red thermal night vision scope was used in support of binoculars and other direct observation methods employed for each transect. No Koala were observed within the transects, however, opportunistic searches revealed a Koala utilising the drainage corridor on the eastern site boundary, and this Koala was visually tracked utilising the same corridor off-site on a daily basis for the survey period.<br><br>During this survey event, efforts were bolstered by the application of infra-red motion detection cameras in strategic potential linkage locations (**Plan 2**), however, no Koala were recorded by the cameras, despite being left in continual locations during the extent of the survey period (day and night).<br><br>  <br>**Strip Transects June 2016**<br><br>*Survey 2:*<br>The direct observational survey was repeated between 30 August and 2 September 2016 with polygons positioned to ensure that all areas of the site had been searched during the application of this methodology. Again, no Koala were observed utilising any of the trees within the ninety-five (95) designated transect polygons, however, one Koala was opportunistically observed between polygons 31 and 34 on one occasion only, and not sighted again despite targeted searches (refer **Plan 3**). Infra-red motion detecting cameras were not deployed during this survey period given they did not detect Koala during the previous survey. | | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|




**Strip Transect August 2016**




**Field survey effort**

**Survey Limitations:**

<table>
<tr><th>Report / Author / Date</th><th>Survey Details</th><th>Survey Results</th><th>Fauna Spotter/catcher reports</th></tr>
<tr><td></td><td>This survey did not target the Greater Glider, however arboreal mammals were the target species. It is considered likely that if the Greater Glider was present, this survey would have recorded the species.</td><td></td><td></td></tr>
<tr><td>Coomera Woods Koala Evaluation and Assessment, Chapter 1: Evaluation of Koala Survey Methodology, Planit Consulting, October 2017</td><td>Extensive additional arboreal mammal and koala specific surveys were performed in 2017 to ground truth previous ecological studies and determine the potential koala population within Coomera Woods.<br><br>Arboreal Mammal / Koala Surveys period: March and May 2017<br><br>Number of surveys: 4 (3 x transect surveys performed over a two (2) day period and SAT site survey).<br><br>Weather Conditions: Varying over the survey period. During Spot Assessment Technique surveys the weather was fine and partly cloudy. During the Line transect surveys the weather was overcast and varying periods of rain. Temperatures and rainfall was not recorded.<br><br>Season: Autumn<br><br>Location: Part Lot 44 on SP207822 & Part Lot 1 on SP165374<br><br>Surveyors:<br><table><tr><th>OBSERVER</th><th>QUALIFICATIONS AND/OR LICENCES</th></tr><tr><td>Boyd Sergeant</td><td>Director, Planit Consulting</td></tr><tr><td>Graham Dart</td><td>Senior Environmental Planner, Planit Consulting</td></tr><tr><td>Tomy Rados</td><td>Environmental Planner, Planit Consulting</td></tr><tr><td>Frank Court</td><td>Qualified Spotter/Catcher</td></tr><tr><td>Brendan Lackey</td><td>Qualified Spotter/Catcher</td></tr><tr><td>Evan Court</td><td>Assistant</td></tr></table><br>Relevant Licences:<br><table><tr><th>Authority</th><th>Licence/permit</th><th>Title</th><th>Expiration</th><th>Permit No.</th></tr><tr><td>QLD EPA/DEHP</td><td>Scientific Purpose Permit</td><td>Wildlife Research</td><td>7 August 2019</td><td>WISP14894214</td></tr><tr><td>QLD DEEDI Animal Ethics</td><td>Scientific Use Registration</td><td>Scientific Use Registration</td><td>14 February 2018</td><td>Reg No. 241</td></tr><tr><td>QLD DAFF Animal Ethics</td><td>Community Access AEC</td><td>Fauna Surveying</td><td>31 May 2017</td><td>CA 2014/05/762</td></tr><tr><td>QLD DEHP</td><td>Rehabilitation Permit NC(Administration)R 2006</td><td>Observe or relocate protected animals</td><td>17 May 2019</td><td>WIRP12736113</td></tr></table><br>Survey Methodology:<br>Two surveying techniques were employed during this study:<br>- The Spot Assessment Technique; and<br>- Line Transect<br>Each is discussed in detail below.<br>Spot Assessment Method<br>This method was used in all the past surveys and is the foundation of the original survey in 2006. The SAT method is an indirect assessment of Koala activity and involves the search of the base of a tree of any species known to have been utilised by a koala, or to be considered of some importance for a koala. In order of priority selection of the centre tree for a SAT site to be based on one or more of the following criteria (Phillip and Callaghan, 2011);</td><td>Arboreal mammals were recorded within this survey including the koala. The Greater Glider was not observed during the surveying period or recorded through scat analysis.<br><br>Statistical Analysis:<br>There is no statistical analysis. This ecological study only establishes the presence, potential occurrence or absence of fauna species. The Greater Glider was not recorded.</td><td>N/A</td></tr>
</table>

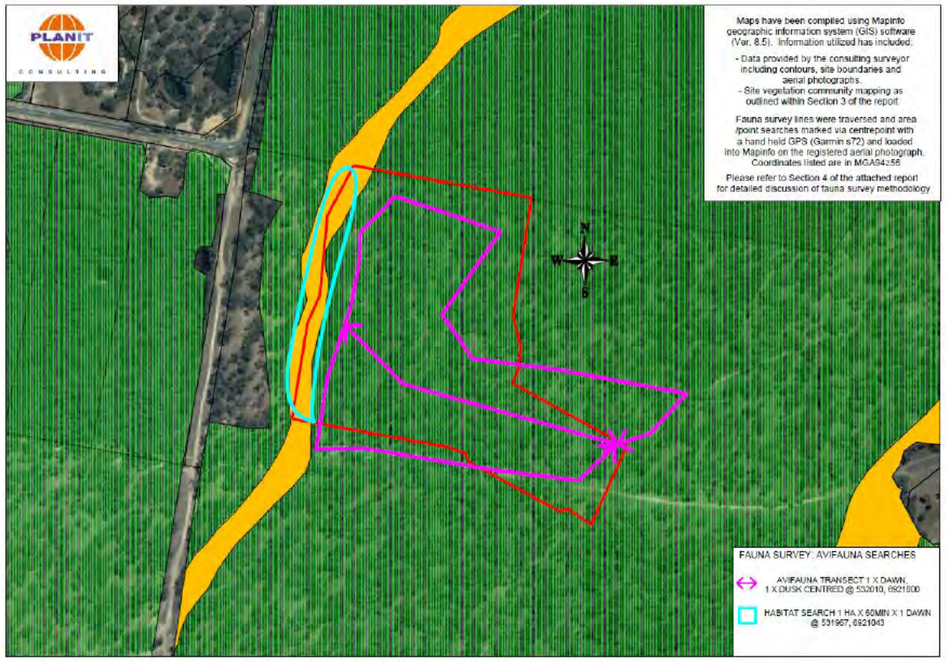
| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | 1. a tree of any species which one or more Koala feacal pellets have been observed; and/or<br>2. a tree in which a Koala has been observed; and/or<br>3. any other tree known or considered to be potentially important for koalas or for other assessment purposes<br><br>The SAT approach locates one tree of the above criteria and then samples 29 of the closet trees. Sampling a minimum of 30 trees establishes a meaningful confidence interval for the activity level and creates a SAT site. The activity level identifies potential habitat and distribution of target species.<br><br>  <br>**SAT Sites performed by Planit Consulting May 2017**<br><br>*Line Transect Method*<br>The method of line transects record visual observation of animals and can be used to sample populations directly or indirectly. This method combined with spotlighting would be the most suited to observing Koala's as they are nocturnal and easier to observe with eyeshine.<br><br>The sampling method was concentrated to a period of 2 day and 1 night session to reduce possible sampling limitations and produce reliable results. The entire CW Site was covered within each session.<br><br>Method performed by Planit 2017:<br>Diurnal;<br>1. Experienced observers walked along a transect line 10-20m apart back and forth across the CW Site providing total site coverage;<br>2. When an animal was detected the GPS location was recorded and plotted.<br><br>Nocturnal; | | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | 1. Experienced observers walked along a transect line 10-20m apart back and forth across the CW Site providing total site coverage;<br>2. Using a spotlight on either side of the line transect to detect individuals with eyeshine;<br>3. When an animal was detected the GPS location was recorded and plotted.<br><br>Figure within the survey results section shows every transects performed and koalas observed during the sampling period (2 days/1 night).<br><br>Searches were undertaken over a 2 day, 1 night period by 6 people.<br><br>  <br><br>**Line Transects Performed by Planit Consulting March 2017**<br><br>**Survey Limitations:**<br>This survey did not target the Greater Glider, however arboreal mammals were the target species. It is considered likely that if the Greater Glider was present, this survey would have recorded the species. | | |
| Residential Development Stages 4 & 9 -10 Big Sky Estate, Lots 4 and 5 on SP334039 Azure Way, Coomera, Referral of Proposed Action, Planit Consulting, April 2014 | The Bloom Estate, formally Big Sky stages 4 & 9 – 10 is adjacent the Coomera Woods Site. The EPBC Referral was submitted in April 2014. Ecological assessments were performed for each individual stage, the EPBC referral document provides a summary of the Arboreal Mammals recorded wihtin the subject site.<br><br>**Survey period:** Stage 4 & 9 – 24 & 27 May 2010; Stage 10 – 14 & 15 october 2009<br><br>**Number of surveys:** 4 surveys for each stage of development (1 x diurnal meander, 1 x nocturnal meander, 1 x call playback, 1 x habitat search), 12 Surveys in total. Minimum 2 nights to complete each nocturnal survey. | Arboreal mammals were recorded within the subject site including the following<br>• Sugar Glider<br>• Squirrel Glider<br>• Common Brushtail Possum; and<br>• Koala.<br>The Greater Glider was not recorded within Stages 4, 9 or 10 of the Bloom Estate.<br><br>Hollowbearing trees were considered scarce across the subject site and therefore reduced habitat value for hollow-dependent arboreal mammals. | Pre-clearing Fauna Value Assessment Report for stages 4,9 & 10 of the Big Sky Estate. Performed by Frank Court, Spotter-catcher of Tomewin Wildlife Consultancy, July 2014.<br><br>Observed arboreal mammals within the site including; koala, Brush-tail Possum and Squirrel Glider. Anticipated the presence of |

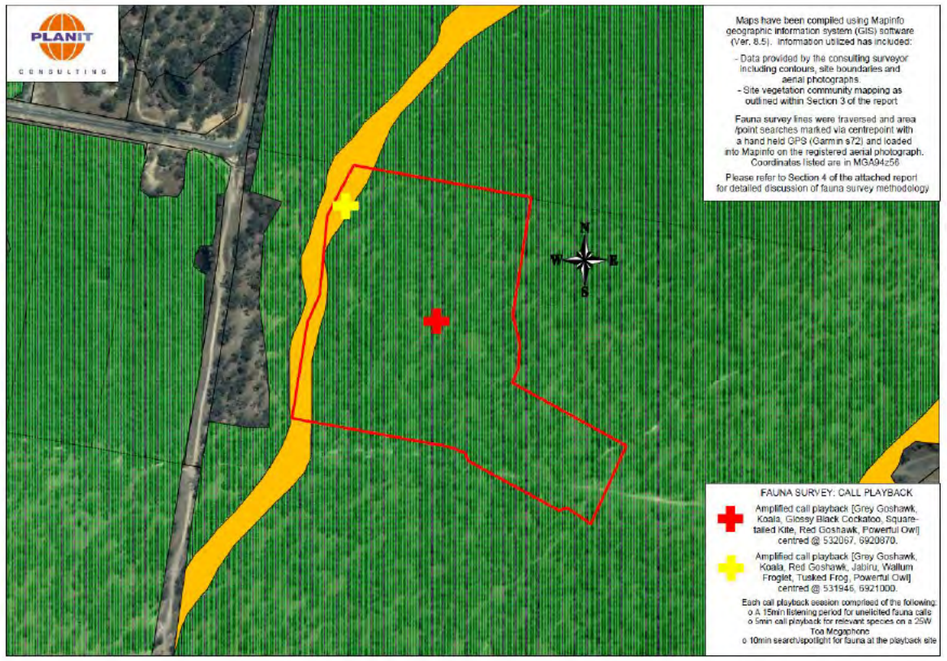
| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| (EPBC 2014/7192) | **Weather Conditions:** Fine partly cloudy. Temperatures and rainfall was not recorded.<br><br>**Season:** Autumn & Spring<br><br>**Surveyor**: Planit Ecologist<br><br>**Location:** Lots 4 and 5 on SP334039 Azure Way, Coomera<br><br>  <br>**Bloom Estate Locality**<br><br>  <br>**Aerial of Subject Site** |  <br>**Hollowbearing Trees within Stage 9**<br><br>  <br>**Hollowbearing Trees within Stage 10** | Sugar Glider and Feathertail Possum.<br><br>Spotter-Catcher report Fauna Management Plan Summary Frank Court, Spotter-Catcher of Tomewin Wildlife Consultancy, 18-30 July 2014.<br><br>Dispersed or Captured and Released Fauna did not include the Greater Glider.<br><br>Arboreal mammals included:<br>• Squirrel Glider; and<br>• Brushtail Possum. |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | **Surveying Methodology**<br>To classify and identify fauna species which occur or may occur on site, the following methodology was applied:<br>• Desktop analysis including:<br>o Review of Council's Planning Scheme Mapping<br>o Review of Environment Australia Protected Matters data and QLD EPA<br>o Wildnet data within a search area 5km surrounding the site to review threatened fauna records<br>o Review of EPA (2007) Southeast Queensland Biodiversity Planning Assessment to identify areas of mapped significance or flagged as important for biodiversity at a regional level v. Review of the following legislation (as relevant):<br>• *Nature Conservation Act 1992* & associated regulations<br>• *Land Protection (Pest and Stock Route Management) Act 2002*<br>• *Environment Protection and Biodiversity Conservation Act 1999*<br>• *Vegetation Management Act 1999* (and associated DNRW/EPA Regional Ecosystem and Essential Habitat/Wildlife Corridors mapping)<br>• *Nature Conservation (Koala) Conservation Plan 2006 and Management Program 2006-2016*<br>• Field survey of the flora communities located within and immediately adjacent to the study area (in accordance with Section 3 above) to review habitat values;<br>• Review of selected ecological surveys previously undertaken in the sub-region including:<br>o Biolink (2007) Conserving koalas in the Coomera-Pimpama Koala Habitat Area: a view to the future Final report prepared for Gold Coast City Council March 2007<br>o Chenoweth EPLA (2001) *Coomera Town Centre Local Area Plan Environmental Management Strategy*. Chenoweth EPLA, Brisbane.<br>o Gravatt, D. (1993) *Birds and Mammals of the East Pimpama Region.* Report to Albert Shire Council.<br>o Gynther, I. (1993) *Vertebrate Fauna of Gainsborough Green.* Report to Naturesearch 2001. Habitat Environmental Management (2007) *Vegetation Management Plan Proposed Development 45 Yawalpah Road & 62 Old Pacific Highway, Pimpama QLD (Lot 5 on RP151596, Lot 3 on RP835836.* HEM, Southport.<br>o Oxbow Consulting (2001) *Coomera Waters Estate Phase 2 Fauna Impact Assessment.*<br>o Planit (2004) *Conservation Assessment for Lot 982 RP801696 Cunningham Drive, Upper Coomera*. The Ingles Group. Planit, Southport.<br>o Planit (2004) *Ecological Assessment for Gainsborough Park QM Properties.* Planit, Surfers Paradise.<br>o Planit (2004) *Ecological Assessment for Dixon Drive. The Ingles Group.* Planit, Surfers Paradise.<br>o Planit (2005) *Ecological Assessment for Stage 26, Phase 4A & Phase 4B Coomera Waters*. Planit, Surfers Paradise.<br>o Planit (2007) *Ecological Assessment for Karingal Drive Leda Developments No. 2 Pty Ltd*. Planit, Surfers Paradise.<br>o Planit (2006) *Ecological Assessment for Edwardson Drive, Coomera. Coomera Town Centre Management.* Planit, Nobby Beach.<br>o Planit (2008) *Updated Ecological Assessment for Stage 26 Coomera Waters Austcorp International Pty Ltd*. Planit, Nobby Beach.<br>o Planit (2008) *Updated Ecological Assessment for Stages 19 & 20 Coomera Waters Austcorp International Pty Ltd*. Planit, Nobby Beach.<br>o Planit (2008) *Updated Ecological Assessment for Stage 26 Coomera Waters Austcorp International Pty Ltd*. Planit, Nobby Beach.<br>o Planit (2008) *Updated Ecological Assessment For COOMERA WOODS CUNNINGHAM DRIVE, COOMERA Part Lot 44 On SP207822 & Part Lot 1 On SP165374*. Planit, Nobby Beach.<br>o Planit (2008) *Updated Ecological Assessment For* COOMERA CENTRE COMMERCIAL PARK OLD PACIFIC HIGHWAY, COOMERA LOT 1 ON SP209027. Planit, Nobby Beach. | The action was determined 'not to be a controlled action'.<br><br>**Statistical Analysis:**<br>There was no statistical analysis. This ecological study only establishes the presence, potential occurrence or absence of fauna species. The Greater Glider was not recorded. | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | ○ Searle, J. (2005) *Fauna Survey Report*. Pimpama Conservation Area. Green Meadows Road Pimpama.<br>○ WBM (1995) *Austcorp Property, Coomera. Environmental Impact Study.*<br>○ WBM (1997) *Environmental Impact Study Volume 2: Coomera Woods an Integrated Major Regional Town Centre*. WBM, Brisbane.<br><br>The following detailed fauna field survey methods were implemented during 24th – 27th May 2010 and 14th -15th October 2009 in general accordance with the following:<br>○ Gold Coast City Council (2006) Planning Scheme Policy 8: *Guidelines for Ecological Assessments*. G.C.C.C., Nerang.<br>○ Shire of Maroochy (1997) *Flora and Fauna Assessment Requirements for Developments in Maroochy Shire*. M.S.C<br>○ Department of Land and Water Conservation (1997) *Interim Guidelines for Targeted and General Flora and Fauna Surveys under the Native Vegetation Conservation Act 1997*. NSWDLWC, Parramatta.<br>○ Brisbane City Council (1999) *Ecological Assessment Guidelines*. B.C.C.<br>○ NSWNPWS (2001) *The Community Biodiversity Survey Manual*. New South Wales National Parks & Wildlife Service.<br>○ Redland Shire's *Planning Scheme Policy 4-Ecological Impacts*<br>○ DEC (2004) *Threatened Biodiversity Survey and Assessment: Guidelines for Developments and Activities Working Draft*. DEC, NSW.<br><br>All field survey was performed under the provisions of 'Scientific Purposes Permit for Fauna Survey' (issued by Queensland Parks and Wildlife Service) and Animal Ethics Committee approval ('Scientific Survey of Fauna Species' issued by Bribie Local Animal Ethics Committee, Queensland Department of Primary Industries).<br><br>**Diurnal Survey**<br>Active searches were conducted for key habitat components and potential macro and micro- habitat components for rare and threatened species;<br>• Binocular search and identification of all fauna heard or sighted;<br>• Opportunistic sightings/audible identifications were conducted and recorded whilst all survey works were being undertaken;<br>• walked transects through the site for a period of 30 minutes on two separate days;<br>• Detailed ground track/trace survey was performed including:<br>- Scat/pellet examination<br>- Scratch/trace examination of trees<br>- Diggings, burrow, trace and track examination<br>- Humus/crevice examination<br>- Examination and assessment of tree hollows, hanging bark, termite mounds, flowering and nesting trees<br>• Diurnal frog-call recognition and identification opportunistically performed during other survey works.<br><br>**Nocturnal Survey**<br>Nocturnal survey included the following survey techniques:<br>• Audible survey for calls, scratching and landings;<br>• Spotlighting utilising:<br>○ Short duration-long distance white light, and<br>○ Long duration-short distance red light<br>Duration on foot: Two researchers on two nights for 120 minutes per night<br>• Naked eye observation utilising dawn/dusk/moon light for bats and fauna returning to potential nest/shelter areas. | | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | • Amplified call recording/playback for mammals. Playback of pre-recorded calls included the following threatened species:<br>o Koala<br><br>Each call playback session comprised of the following:<br>o A 15min listening period for unelicited fauna calls<br>o 5min call playback for relevant species on a 25W Toa Megaphone<br>o 10min search/spotlight for fauna at the playback site<br>Depending on the targeted species playback was undertaken at dawn, dusk and/or after dark. All call files were obtained from BOCA or NATURESOUND.<br><br>  <br>**Surveying Effort: Survey Effort (Pink – Transects, Blue – Habitat search) Stage 9** | | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|




**Surveying Effort: Call Playback Locations (Grey Goshawk, Koala, Glossy Black Cockatoo, Square-tailed Kite, Red Goshawk and Powerful Owl) Stage 9**

<table>
<tr><th>Report / Author / Date</th><th>Survey Details</th><th>Survey Results</th><th>Fauna Spotter/catcher reports</th></tr>
<tr><td></td><td>Surveying Effort: Call Playback Location (Grey Goshawk, Koala, Glossy Black Cockatoo, Square-tailed Kite, Red Goshawk and Powerful Owl) Stage 10<br> 

Surveying Effort: Spotlighting Transects (Pink) Stage 10<br><br>Survey Limitations:<br>This survey did not target the Greater Glider, however arboreal mammals were the target species. It is considered likely that if the Greater Glider was present, this survey would have recorded the species.</td><td></td><td></td></tr>
<tr><td>Residential Development Stages 5-8 Big Sky Estate, Lots 2 and 3 on SP234039 Celestial Way , Coomera, EPBC Referral of Proposed Action, Planit Consulting, July 2015<br><br>(EPBC 2015/7535)</td><td>The Bloom Estate, formally Big Sky stages 5 – 8 is adjacent the Coomera Woods Site. The EPBC Referral was submitted in July 2015. Ecological assessments were performed for each individual stage, the EPBC referral document provides a summary of the Arboreal Mammals recorded wihtin the site.<br><br>Surveys Period: 11 & 12 March 2010<br><br>Number of surveys: 4 (1 x diurnal meander, 1 x nocturnal meander, 1 x SAT survey, 1 X daytime koala transects) Minimum 2 nights to complete nocturnal surveys.<br><br>Weather Conditions: Fine partly cloudy. Temperatures and rainfall was not recorded.<br><br>Season: Autumn<br><br>Surveyor: Planit Ecologist<br><br>Relevant Licences:
<table>
<tr><th>Authority</th><th>Licence/permit</th><th>Title</th><th>Expiration</th><th>Permit No.</th></tr>
<tr><td>QLD EPA/DEHP</td><td>Scientific Purpose Permit</td><td>Wildlife Research</td><td>11 June 2014</td><td>WISP06002009</td></tr>
<tr><td>QLD DEEDI Animal Ethics</td><td>Scientific Use Registration</td><td>Scientific Use Registration</td><td>14 February 2012</td><td>RN241</td></tr>
</table></td><td>Arboreal mammals were recorded within the subject site including the following<br>• Sugar Glider<br>• Squirrel Glider<br>• Common Brushtail Possum; and<br>• Koala.<br>The Greater Glider was not recorded within Stages 4, 9 or 10 of the Bloom Estate.<br><br>Hollowbearing trees were considered scarce across the subject site and therefore reduced habitat value for hollow-dependent arboreal mammals.</td><td>Spotter-Catcher Report, Post-Clearing Fauna Summary Frank Court Spotter-Catcher of Tomewin Wildlife Consultancy, 29 June to 20 July.<br><br>Dispersed or Captured and Released Fauna did not include the Greater Glider.<br><br>Arboreal mammals included:<br>• Koala;<br>• Sugar Glider; and<br>• Brushtail Possum.</td></tr>
</table>

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|

| | | | | |
|---|---|---|---|---|
| QLD DAFF Animal Ethics | Community Access AEC | Fauna Surveying | 31 May 2012 | CA 2009/05/353 |

**Location:** Lots 2 and 3 on SP234039 Celestial Way, Coomera.


**Bloom Estate Locality**

**Subject Site Aerial**

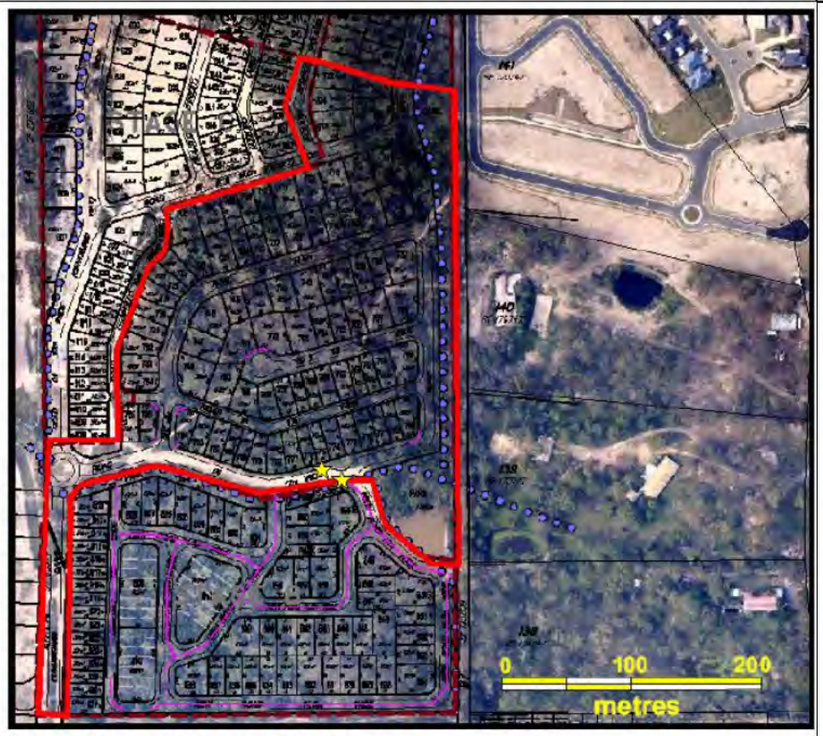

**Location of Hollowbearing trees within Stage 5B**

## Surveying Methodology

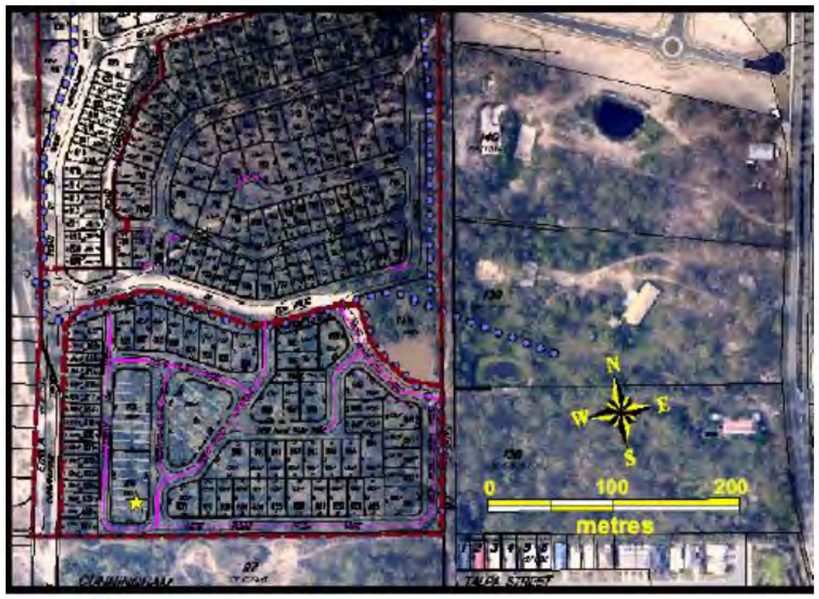
| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|

To classify and identify fauna species which occur or may occur on site, the following methodology was applied:

- Desktop analysis including:
  - Review of Council's Planning Scheme Mapping
  - Review of Environment Australia Protected Matters data and QLD EPA
  - Wildnet data within a search area 5km surrounding the site to review threatened fauna records
  - Review of EPA (2007) Southeast Queensland Biodiversity Planning Assessment to identify areas of mapped significance or flagged as important for biodiversity at a regional level v. Review of the following legislation (as relevant):
- *Nature Conservation Act 1992* & associated regulations
- *Land Protection (Pest and Stock Route Management) Act 2002*
- *Environment Protection and Biodiversity Conservation Act 1999*
- *Vegetation Management Act 1999* (and associated DNRW/EPA Regional Ecosystem and Essential Habitat/Wildlife Corridors mapping)
- *Nature Conservation (Koala) Conservation Plan 2006 and Management Program 2006-2016*
- Field survey of the flora communities located within and immediately adjacent to the study area (in accordance with Section 3 above) to review habitat values;
- Review of selected ecological surveys previously undertaken in the sub-region including:
  - Biolink (2007) Conserving koalas in the Coomera-Pimpama Koala Habitat Area: a view to the future Final report prepared for Gold Coast City Council March 2007
  - Chenoweth EPLA (2001) *Coomera Town Centre Local Area Plan Environmental Management Strategy*. Chenoweth EPLA, Brisbane.
  - Gravatt, D. (1993) *Birds and Mammals of the East Pimpama Region.* Report to Albert Shire Council.
  - Gynther, I. (1993) *Vertebrate Fauna of Gainsborough Green.* Report to Naturesearch 2001. Habitat Environmental Management (2007) *Vegetation Management Plan Proposed Development 45 Yawalpah Road & 62 Old Pacific Highway, Pimpama QLD (Lot 5 on RP151596, Lot 3 on RP835836.* HEM, Southport.
  - Oxbow Consulting (2001) *Coomera Waters Estate Phase 2 Fauna Impact Assessment.*
  - Planit (2004) *Conservation Assessment for Lot 982 RP801696 Cunningham Drive, Upper Coomera*. The Ingles Group. Planit, Southport.
  - Planit (2004) *Ecological Assessment for Gainsborough Park QM Properties.* Planit, Surfers Paradise.
  - Planit (2004) *Ecological Assessment for Dixon Drive. The Ingles Group.* Planit, Surfers Paradise.
  - Planit (2005) *Ecological Assessment for Stage 26, Phase 4A & Phase 4B Coomera Waters*. Planit, Surfers Paradise.
  - Planit (2007) *Ecological Assessment for Karingal Drive Leda Developments No. 2 Pty Ltd*. Planit, Surfers Paradise.
  - Planit (2006) *Ecological Assessment for Edwardson Drive, Coomera. Coomera Town Centre Management.* Planit, Nobby Beach.
  - Planit (2008) *Updated Ecological Assessment for Stage 26 Coomera Waters Austcorp International Pty Ltd*. Planit, Nobby Beach.
  - Planit (2008) *Updated Ecological Assessment for Stages 19 & 20 Coomera Waters Austcorp International Pty Ltd*. Planit, Nobby Beach.
  - Planit (2008) *Updated Ecological Assessment for Stage 26 Coomera Waters Austcorp International Pty Ltd*. Planit, Nobby Beach.
  - Planit (2008) *Updated Ecological Assessment For COOMERA WOODS CUNNINGHAM DRIVE, COOMERA Part Lot 44 On SP207822 & Part Lot 1 On SP165374*. Planit, Nobby Beach.
  - Planit (2008) *Updated Ecological Assessment For* COOMERA CENTRE COMMERCIAL PARK OLD PACIFIC HIGHWAY, COOMERA LOT 1 ON SP209027. Planit, Nobby Beach.
  - Searle, J. (2005) *Fauna Survey Report*. Pimpama Conservation Area. Green Meadows Road Pimpama.




**Location of Hollowbearing Trees within Stage 7**

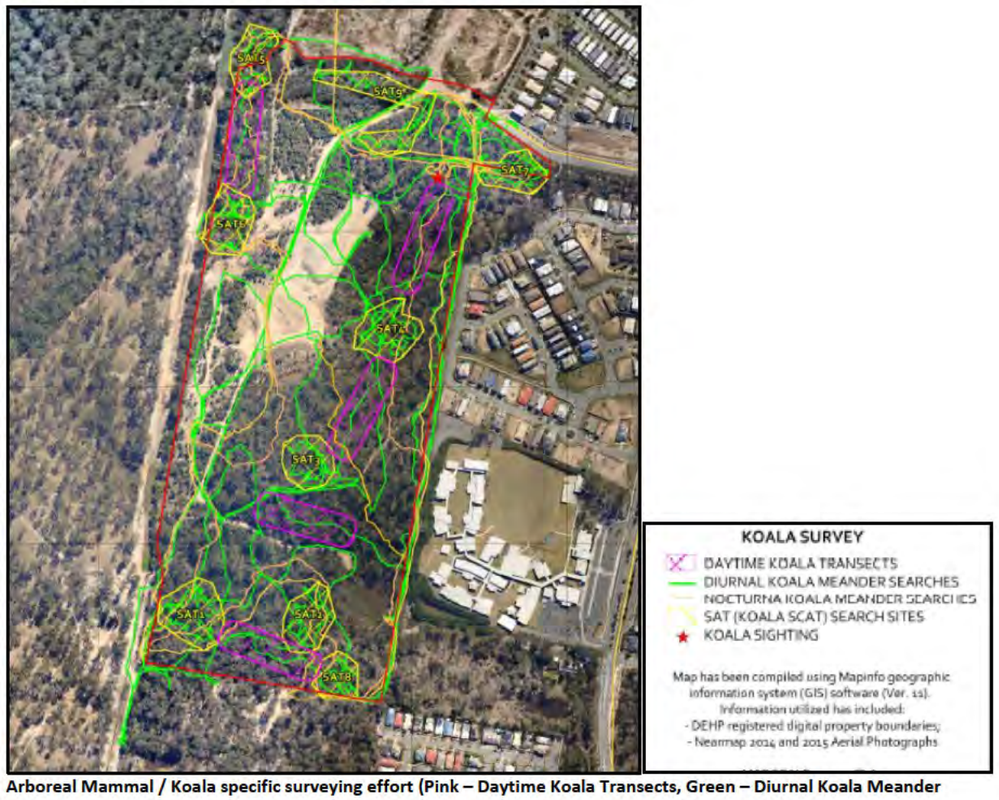



**Location of Hollowbearing Trees within Stage 8**

The action was determined 'not to be a controlled action'.

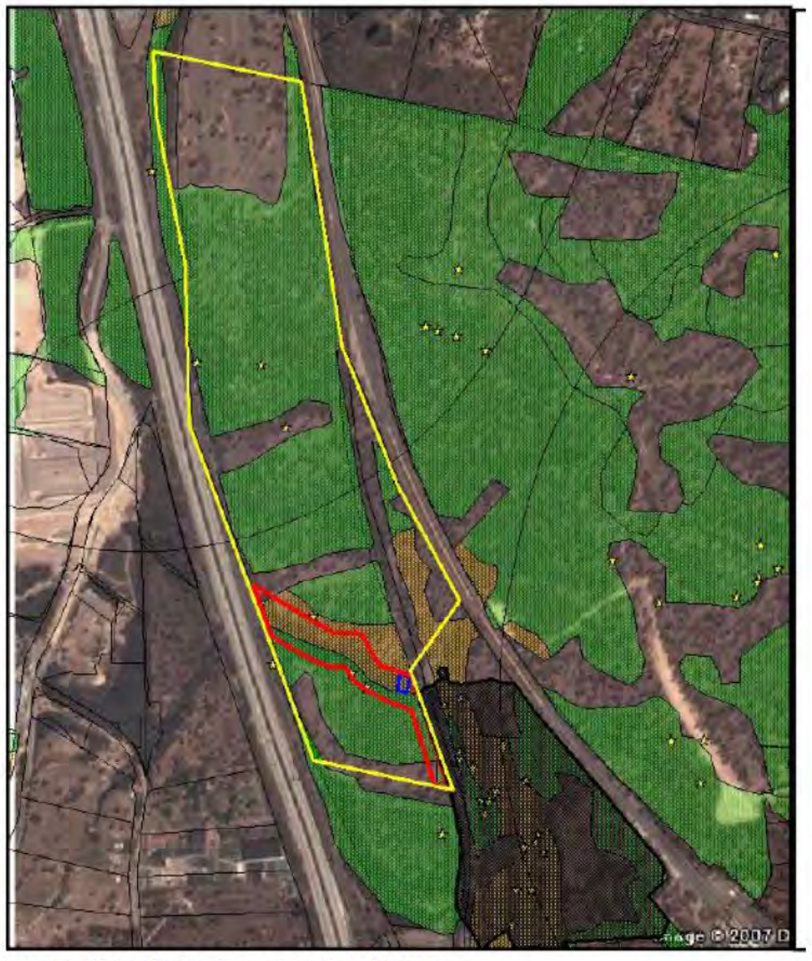
**Statistical Analysis:**

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | ○ WBM (1995) *Austcorp Property, Coomera. Environmental Impact Study.*<br>○ WBM (1997) *Environmental Impact Study Volume 2: Coomera Woods an Integrated Major Regional Town Centre*. WBM, Brisbane.<br><br>The following detailed fauna field survey methods were implemented during 11th & 12th March 2010 in general accordance with the following:<br>○ Gold Coast City Council (2006) Planning Scheme Policy 8: *Guidelines for Ecological Assessments*. G.C.C.C., Nerang.<br>○ Shire of Maroochy (1997) *Flora and Fauna Assessment Requirements for Developments in Maroochy Shire*. M.S.C<br>○ Department of Land and Water Conservation (1997) *Interim Guidelines for Targeted and General Flora and Fauna Surveys under the Native Vegetation Conservation Act 1997*. NSWDLWC, Parramatta.<br>○ Brisbane City Council (1999) *Ecological Assessment Guidelines*. B.C.C.<br>○ NSWNPWS (2001) *The Community Biodiversity Survey Manual*. New South Wales National Parks & Wildlife Service.<br>○ Redland Shire's *Planning Scheme Policy 4-Ecological Impacts*<br>○ DEC (2004) *Threatened Biodiversity Survey and Assessment: Guidelines for Developments and Activities Working Draft*. DEC, NSW.<br><br>All field survey was performed under the provisions of 'Scientific Purposes Permit for Fauna Survey' (issued by Queensland Parks and Wildlife Service) and Animal Ethics Committee approval ('Scientific Survey of Fauna Species' issued by Bribie Local Animal Ethics Committee, Queensland Department of Primary Industries).<br><br>**Diurnal Survey**<br>Active searches were conducted for key habitat components and potential macroand micro- habitat components for rare and threatened species;<br>• Binocular search and identification of all fauna heard or sighted;<br>• Opportunistic sightings/audible identifications were conducted and recorded whilst all survey works were being undertaken;<br>• walked transects through the site for a period of 30 minutes on two separate days;<br>• Detailed ground track/trace survey was performed including:<br>- Scat/pellet examination<br>- Scratch/trace examination of trees<br>- Diggings, burrow, trace and track examination<br>- Humus/crevice examination<br>- Examination and assessment of tree hollows, hanging bark, termite mounds, flowering and nesting trees<br>• Diurnal frog-call recognition and identification opportunistically performed during other survey works.<br><br>**Nocturnal Survey**<br>Nocturnal survey included the following survey techniques:<br>• Audible survey for calls, scratching and landings;<br>• Spotlighting utilising:<br>○ Short duration-long distance white light, and<br>○ Long duration-short distance red light<br>Duration on foot: Two researchers on two nights for 120 minutes per night<br><br>• Naked eye observation utilising dawn/dusk/moon light for bats and fauna returning to potential nest/shelter areas. | There was no statistical analysis. This ecological study only establishes the presence, potential occurrence or absence of fauna species. The Greater Glider was not recorded. | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | • Amplified call recording/playback for mammals. Playback of pre-recorded calls included the following threatened species:<br>o Koala<br>Each call playback session comprised of the following:<br>o A 15min listening period for unelicited fauna calls<br>o 5min call playback for relevant species on a 25W Toa Megaphone<br>o 10min search/spotlight for fauna at the playback site<br><br>Depending on the targeted species playback was undertaken at dawn, dusk and/or after dark. All call files were obtained from BOCA or NATURESOUND.<br><br>  <br>**Arboreal Mammal / Koala specific surveying effort (Pink – Daytime Koala Transects, Green – Diurnal Koala Meander Searches, Orange – Nocturnal Koala Meander Searches, Yellow – SAT Site, Red Star – Koala Sighting).**<br><br>**Survey Limitations:**<br>This survey did not target the Greater Glider, however arboreal mammals were a target species. It is considered likely that if the Greater Glider was present, this survey would have recorded the species. | | |
| Updated Ecological Assessment Lot 1 SP209027, Old Pacific Highway, Coomera, Coomera Town Centre, Planit | Lot 1 on SP209027is adjacent the Coomera Woods Site. An Ecological Assessment was performed by Planit Consulting for this site in 2004, reporting was then updated within 2008.The EPBC Referral was submitted in 2013 (EPBC 2012/6819).<br><br>**Initial surveys period:** November 2003 - May 2004<br><br>**Updated surveys period:** February - March 2008<br><br>**Number of Surveys:** 4 (1 x diurnal meander, 1 x nocturnal meander, 1 x call playback, 1 x trapping) | Arboreal mammals were recorded within the subject site including the following<br>• Sugar Glider<br>• Squirrel Glider<br>• Common Brushtail Possum;<br>• Common ringtail possum; and<br>• Koala<br><br>The Greater Glider was not recorded within the subject site. | Spotter-Catcher Report, Fauna Management Plan Summary, Frank Court, Spotter-Catcher of Tomewin Wildlife Consultancy, 13 October to 21 November 2014.<br><br>Dispersed or Captured and Released Fauna did not include the Greater Glider. |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| Consulting, March 2008.<br><br>(EPBC 2013/6819) | Minimum 2 nights to complete nocturnal surveys.<br><br>**Weather Conditions**: Varying over survey period. Temperatures and rainfall was not recorded.<br><br>**Season:** Autumn<br><br>**Surveyor**: Planit Ecologist<br><br>**Relevant Licences:**<br><br>**Location:** Lot 1 on SP209027, Old Pacific Highway, Coomera.<br><br>Aerial of Subject Site<br><br>**Surveying Methodology**<br>To classify and identify faunal populations and species which occur or may occur on site, the following methodology was applied:<br><br>• Literature review of previous surveys undertaken within the general locality including the following:<br>o WBM (1997) *Environmental Impact Study Volume 2: Coomera Woods an Integrated Major Regional Town Centre*. WBM, Brisbane.<br>o Chenoweth EPLA (2001) *Coomera Town Centre Local Area Plan Environmental Management Strategy*. Chenoweth EPLA, Brisbane. | Hollowbearing trees were considered scarce across the subject site and therefore reduced habitat value for hollow-dependent arboreal mammals.<br><br>Location of Hollowbearing Trees within the subject site<br><br>The proposed action was determined to 'not be a controlled action'.<br><br>**Statistical Analysis:**<br>This ecological study only establishes the presence, potential occurrence or absence of fauna species. The Greater Glider was not recorded and therefore is a statistic of 0. | Arboreal mammals included:<br>• Koala;<br>• Squirrel Glider;<br>• Sugar Glider; and<br>• Brushtail Possum. |

| Authority | Licence/Permit | Title | Expiration | Permit No. |
|---|---|---|---|---|
| EPA/QPWS | Scientific Purposes Permit | Wildlife Research | 30 May 2009 | WISP03727506 |
| QLD DPI&F | Scientific Use Registration | Scientific Use Registration | 15 February 2009 | 06/02204 |
| QLD DPI&F Animal Ethics | Community Access AEC | Environmental Studies- Fauna Survey for Scientific Purposes | 26 March 2009 | CA 2006/03/112 |

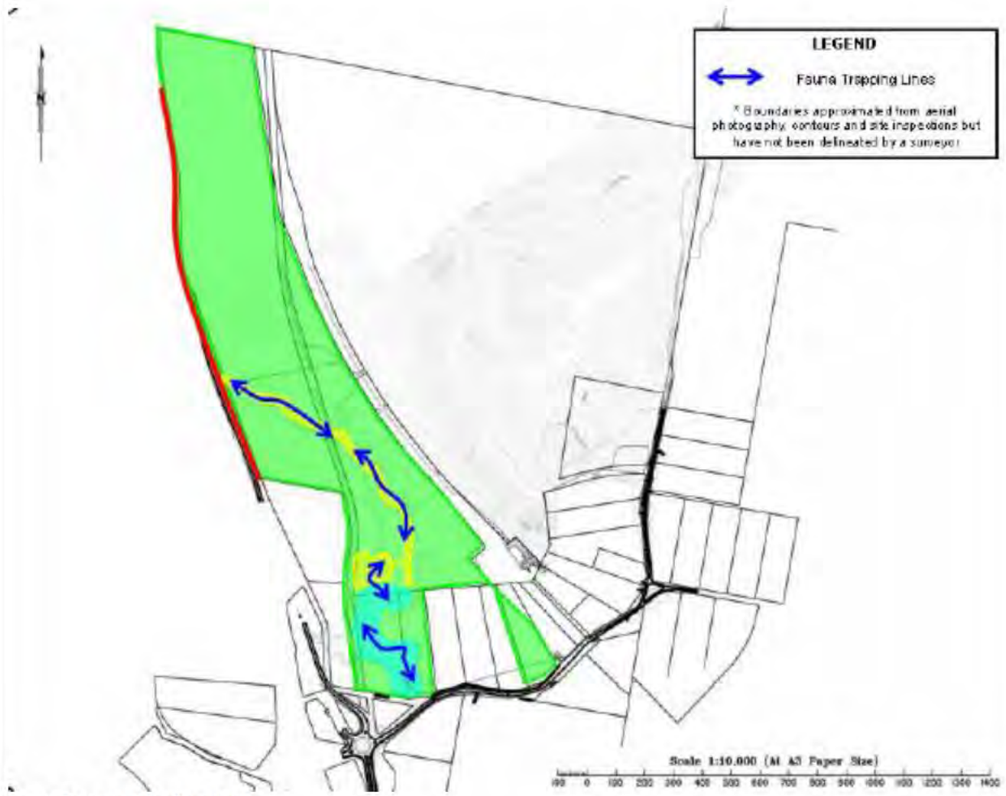



| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | • Review of Wildnet Data;<br>• Field survey of the flora communities located within and immediately adjacent to the study area to determine habitat values;<br>• Study teams' experience and knowledge of the study area and protected flora and fauna;<br>• The following detailed fauna field survey methods were implemented during the months of November 2003-May 2004 with updated diurnal survey and koala searches in February-March 2008 in general accordance with the following:<br>- Gold Coast City Council (2002) *Guidelines for Preparing Ecological Site Assessments During the Development Process: Planning Scheme Policy*. GCCC, Nerang.<br>- Department of Environment and Heritage (1999) *Suggested Conservation Criteria for Development Assessment*. DEH, Brisbane.<br>- Shire of Maroochy (1997) *Flora and Fauna Assessment Requirements for Developments in Maroochy Shire*. M.S.C<br>- Department of Land and Water Conservation (1997) *Interim Guidelines for Targeted and General Flora and Fauna Surveys under the Native Vegetation Conservation Act 1997.* NSWDLWC, Parramatta.<br>- Brisbane City Council (1999) *Ecological Assessment Guidelines*. B.C.C.<br>- NSWNPWS (2001) *The Community Biodiversity Survey Manual*. New South Wales National Parks & Wildlife Service.<br>- Redland Shire's *Planning Scheme Policy 4-Ecological Impacts*<br><br>All field survey was performed under the provisions of 'Scientific Purposes Permit for Fauna Survey' (issued by Queensland Parks and Wildlife Service) and Animal Ethics Committee approval ('Scientific Survey of Fauna Species' issued by Bribie Local Animal Ethics Committee, Queensland Department of Primary Industries).<br><br>**Diurnal Survey**<br>Active searches were conducted for key habitat components and potential macroand micro- habitat components for rare and threatened species;<br>• Binocular search and identification of all fauna heard or sighted;<br>• Opportunistic sightings/audible identifications were conducted and recorded whilst all survey works were being undertaken;<br>• walked transects through the site for a period of 30 minutes on two separate days;<br>• Detailed ground track/trace survey was performed including:<br>- Scat/pellet examination<br>- Scratch/trace examination of trees<br>- Diggings, burrow, trace and track examination<br>- Humus/crevice examination<br>- Examination and assessment of tree hollows, hanging bark, termite mounds, flowering and nesting trees<br>• Trapping for fauna was performed in accordance with permits issued to Planit Consulting. Type 'A' & 'B' Elliot traps and open wire traps (hook baited and foot paddle spring-loaded) of various sizes were utilised. Traps were set at intervals of approximately 10-20 metres depending on habitat complexity within the surveyed vegetation remnants.<br><br>Traps remained in place for 96 hours and were checked and emptied (where necessary) every morning. Baits utilized within the traps included rolled oats & golden syrup, rolled oats & peanut | | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|

butter, dog biscuits, tuna, banana, apple, sunflower seed mix, wombaroo insectivore mix, liver and chicken. In addition selected baits were laced with aniseed or vanilla essence.

| | Elliot Traps | Cage Traps | Pitfall Traps |
|---|---|---|---|
| No. of days per trap line | 4 | 4 | 4 |
| No. of replications across survey period | 4 | 4 | 4 |
| No. of traps per line | 20 | 2 | 2 |
| Total no. of trap nights | 1280 | 128 | 128 |




**Fauna Trapping Line Locations**

**Nocturnal Survey**

Nocturnal survey included the following survey techniques:

- Audible survey for calls, scratching and landings;
- Spotlighting utilising:
  - Short duration-long distance white light, and
  - Long duration-short distance red light

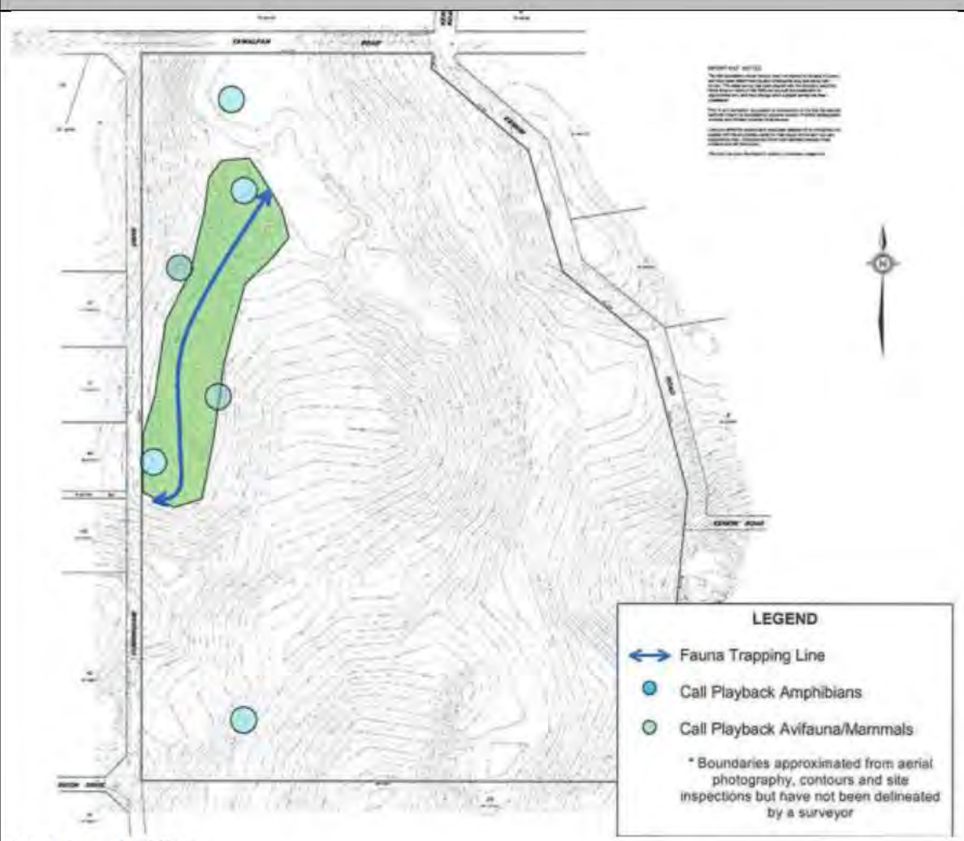
Duration on foot: Two researchers on two nights for 120 minutes per night

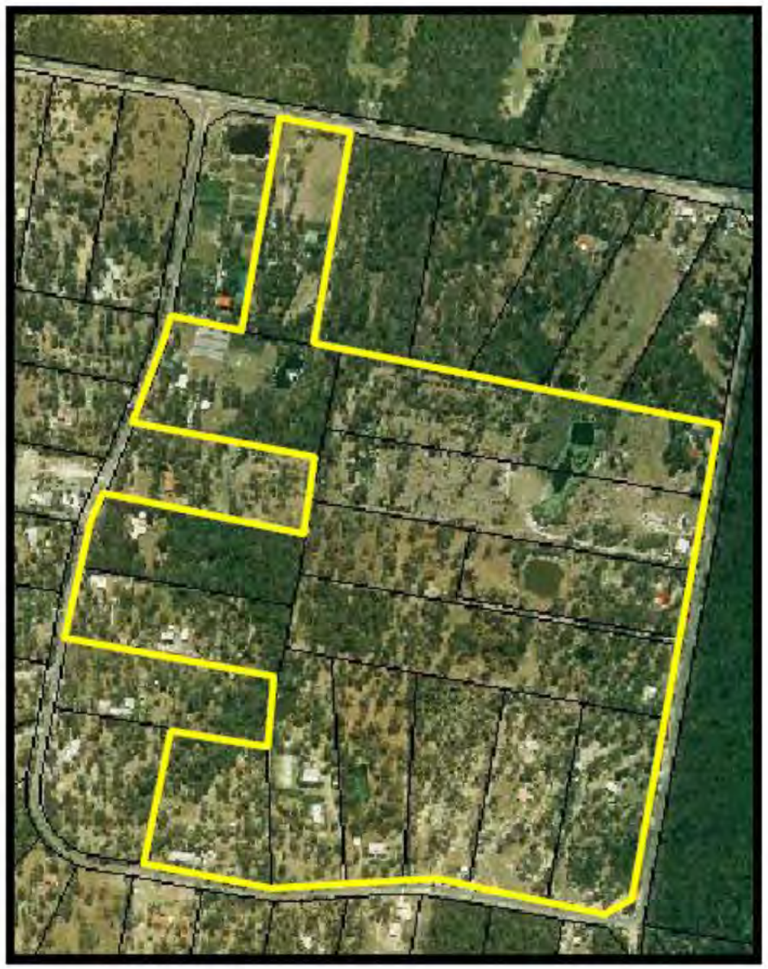
- Naked eye observation utilising dawn/dusk/moon light for bats and fauna returning to potential nest/shelter areas.
- Amplified call recording/playback for mammals. Playback of pre-recorded calls included the following threatened species:
  - Koala
  - Yellow-bellied Glider

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | ○ Sugar Glider<br>○ Squirrel Glider<br>Calls were broadcast for approximately 5 minutes followed by a 10 minute listening period and spotlighting (for nocturnal species). Depending on the species targeted, call play-back was used at dusk, after dark and/or at dawn.<br>  <br><br>**Call Playback Locations (Orange- avifauna/mammals, Blue – amphibians)**<br><br>**Survey Limitations:**<br>This survey did not target the Greater Glider, however arboreal mammals were a target species. It is considered likely that if the Greater Glider was present, this survey would have recorded the species. | | |
| Updated Ecological Assessment, Gainsborough Park, Planit Consulting, May 2004.<br><br>(EPBC 2012/6667) | Gainsborough Park is located to the north of Coomera Woods. Initial Ecological studies were performed in 2004. The EPBC Referral was submitted in 2012 (EPBC 2012/6667).<br><br>**Survey Period:** April – May 2004<br><br>**Number of surveys:** 4 ( 1 x diurnal meander, 1 x nocturnal meander, 1 x call playback, 1 x trapping) Minimum 2 nights to complete nocturnal surveys<br><br>**Weather Conditions:** Varying over the survey period. Temperatures and rainfall was not recorded.<br><br>**Season:** Autumn<br><br>**Surveyor:** Planit Ecologist | This survey recorded arboreal mammals. The Greater Glider was not observed during the surveying period or recorded through scat analysis.<br><br>Recorded Arboreal mammals;<br>• Brushtail Possum; and<br>• Koala<br><br>EPBC 2012/6667 - The proposed action was determined to 'not be a controlled action'.<br><br>**Statistical Analysis:**<br>There was no statistical analysis. This ecological study only establishes the presence, potential occurrence or absence of fauna species. The Greater Glider was not recorded. | Pre-clearing Fauna Value Assessment, Frank Court, Spotter-Catcher, Tomewin Wildlife Consultancy. Gainsborough Park Stages 1-3 Cunningham Drive North, Coomera 22, 25 & 27 February 2008.<br><br>Arboreal mammals recorded:<br>• Koala<br>• Squirrel Glider<br>• Brush-tail Possum |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | **Location**: Lot 73 on W3187, Yawalpah Road, Coomera<br>  <br><br>**Subject Site Aerial**<br><br>**Survey Methodology**<br>To classify and identify faunal populations and species which occur or may occur on site, the following methodology was applied as part of previous surveying efforts:<br>• Literature review of previous surveys undertaken within the general locality (including reports undertaken for Gainsborough Greens and the Coomera Town Centre Environmental Management Strategy);<br>• Field survey of the flora communities located within and immediately adjacent to the study area to determine habitat values;<br>• Study teams' experience and knowledge of the study area and protected flora and fauna.<br><br>All field survey was performed under the provisions of 'Scientific Purposes Permit for Fauna Survey' (issued by Queensland Parks and Wildlife Service) and Animal Ethics Committee approval ('Scientific Survey of Fauna Species' issued by Bribie Local Animal Ethics Committee, Queensland Department of Primary Industries).<br><br>**Diurnal Survey**<br>Active searches were conducted for key habitat components and potential macroand micro- habitat components for rare and threatened species;<br>• Binocular search and identification of all fauna heard or sighted;<br>• Opportunistic sightings/audible identifications were conducted and recorded whilst all survey works were being undertaken; | | Spotter-Catcher Report, Fauna Management Plan, Gainsborough Park Stage 2, Cunningham Drive North, Coomera, 16 February 2010.<br><br>Arboreal mammals recorded:<br>• Koala<br>• Squirrel Glider<br>• Brush-tail Possum<br><br>Gainsborough Park Stages 4-12 Cunningham Drive North, Coomera. Initial Survey performed 22,23 of June 2010 & 12,19 July 2010. Review Survey perform 17 June 2012.<br><br>Arboreal mammals recorded:<br>• Squirrel Glider; and<br>• Brush-tail Possum. |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | • Detailed ground track/trace survey was performed including:<br>- Scat/pellet examination<br>- Scratch/trace examination of trees<br>- Diggings, burrow, trace and track examination<br>- Humus/crevice examination<br>- Examination and assessment of tree hollows, hanging bark, termite mounds, flowering and nesting trees<br>• Trapping for fauna was performed in accordance with permits issued to Planit Consulting. Type 'A' Elliot traps, pitfall traps and open wire traps were utilised. Traps were set at intervals of approximately 10-20 metres depending on habitat complexity within the surveyed vegetation remnants.<br><br>Traps remained in place for between 72 and 96 hours and were checked and emptied (where necessary) every morning. Baits utilized within the traps included rolled oats & golden syrup, rolled oats & peanut butter, dog biscuits, tuna, banana, apple, sunflower seed mix, wombaroo insectivore mix, liver and chicken. In addition selected baits were laced with aniseed or vanilla essence.<br><br>**Nocturnal Survey**<br>Nocturnal survey included the following survey techniques:<br>• Audible survey for calls, scratching and landings;<br>• Spotlighting utilising:<br>o Short duration-long distance white light, and<br>o Long duration-short distance red light<br>Duration on foot: Two researchers on two nights for 120 minutes per night<br>• Naked eye observation utilising dawn/dusk/moon light for bats and fauna returning to potential nest/shelter areas.<br>• Amplified call recording/playback for mammals. Playback of pre-recorded calls included the following threatened species:<br>o Koala<br>o Yellow-bellied Glider<br>o Sugar Glider<br>o Squirrel Glider<br>Calls were broadcast for approximately 5 minutes followed by a 10 minute listening period and spotlighting (for nocturnal species). Depending on the species targeted, call play-back was used at dusk, after dark and/or at dawn | | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| |  <br>**Fauna Surveying Effort**<br><br>**Survey Limitations:**<br>This survey did not target the Greater Glider, however arboreal mammals were the target species. It is considered likely that if the Greater Glider was present, this survey would have recorded the species. | | |
| Ecological Assessment, Dixon Drive, Planit Consulting, January 2004. | The subject site is located to the north of Coomera Woods and known as The Meadows Estate.<br><br>**Survey Period:** June-November 2003<br><br>**Number of surveys:** 4 ( 1 x diurnal meander, 1 x nocturnal meander, 1 x call playback, 1 x trapping) Minimum 2 nights to complete nocturnal surveys<br><br>**Weather Conditions**: Partly cloudy.<br><br>Max & Min Temperatures:<br>Day: 20-31$^0$C<br>Night: 16-22$^0$C<br><br>Light northerly winds.<br><br>**Season:** Winter - Summer<br><br>**Surveyor**: Planit Ecologist | This survey recorded arboreal mammals. The Greater Glider was not observed during the surveying period or recorded through scat analysis.<br><br>Recorded Arboreal mammals;<br>• Brushtail Possum.<br><br>**Statistical Analysis:**<br>There was no statistical analysis. This ecological study only establishes the presence, potential occurrence or absence of fauna species. The Greater Glider was not recorded. | This development has occurred in multiple stages. A number of the post-clearing spotter catcher reports are summarised below.<br><br>Spotter-Catcher Report, Post-clearing Fauna Summary, Frank Court Spotter-Catcher, Tomewin Wildlife Consultancy. The Meadows, 51 Dixon Drive Pimpama. 22-23/4/2013<br><br>No Arboreal mammals were dispersed or captured and released/relocated.<br><br>Spotter-Catcher Report, Post-clearing Fauna Summary, Frank |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | **Location:** The site incorporated the following allotments which front either Yawalpah Road, Dixon Drive or Cunningham Drive North at Upper Coomera;<br>• Lot 6 on RP156726<br>• Lots 31-33 on RP163789<br>• Lots 34-35 & 37-42 on RP168217<br>• Lot 43 on RP184234<br>• Lots 44 & 45 on RP817755<br>• Lots 12 & 13 on RP184234<br>  <br>**Subject Site Aerial**<br>**Survey Methodology**<br>To classify and identify faunal populations and species which occur or may occur on site, the following methodology was applied: | | Court Spotter-Catcher, Tomewin Wildlife Consultancy. The Meadows Stages 6B and 8A Dixon Road Widening, spotter-catcher attendance: 11 August, 2, 3, 5, 8 & 18 of September 2014.<br><br>No Arboreal mammals were dispersed or captured and released/relocated.<br><br>Spotter-Catcher Report, Post-clearing Fauna Summary, Frank Court Spotter-Catcher, Tomewin Wildlife Consultancy. Stage 9 The Meadows Estate, Dixon Drive. Spotter Catcher Attendance: 28 April 2015.<br><br>No Arboreal mammals were dispersed or captured and released/relocated. |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | • Literature review of previous surveys undertaken within the general locality (including reports undertaken for Gainsborough Greens and the Coomera Town Centre Environmental Management Strategy);<br>• Field survey of the flora communities located within and immediately adjacent to the study area to determine habitat values;<br>• Study teams' experience and knowledge of the study area and protected flora and fauna;<br>• The following detailed fauna field survey methods were implemented during the months of June-November 2003 in general accordance with the following:<br>- Gold Coast City Council (2002) *Guidelines for Preparing Ecological Site Assessments During the Development Process: Planning Scheme Policy*. GCCC, Nerang.<br>- Department of Environment and Heritage (1999) *Suggested Conservation Criteria for Development Assessment*. DEH, Brisbane.<br>- Shire of Maroochy (1997) *Flora and Fauna Assessment Requirements for Developments in Maroochy Shire*. M.S.C<br>- Department of Land and Water Conservation (1997) *Interim Guidelines for Targeted and General Flora and Fauna Surveys under the Native Vegetation Conservation Act 1997.* NSWDLWC, Parramatta.<br>- Brisbane City Council (1999) *Ecological Assessment Guidelines*. B.C.C.<br>- NSWNPWS (2001) *The Community Biodiversity Survey Manual*. New South Wales National Parks & Wildlife Service.<br>All field survey was performed under the provisions of 'Scientific Purposes Permit for Fauna Trapping' (issued by Queensland Parks and Wildlife Service) and Animal Ethics Committee approval ('Scientific Survey of Fauna Species' issued by Bribie Local Animal Ethics Committee, Queensland Department of Primary Industries).<br>**Diurnal Survey**<br>• Active searches were conducted for key habitat components and potential macro and micro habitat components for rare and threatened species;<br>• Binocular search and identification of all fauna heard or sighted;<br>• Opportunistic sightings/audible identifications were conducted and recorded whilst all survey works were being undertaken;<br>• Detailed ground track/trace survey was performed including:<br>- Scat/pellet examination<br>- Scratch/trace examination on trees<br>- Diggings, burrow, trace and track examination<br>- Humus/crevice examination<br>• Examination and assessment of tree hollows, hanging bark, termite mounds, flowering and nesting trees<br>• Trapping for fauna was performed in accordance with QPWS and DPI approvals issued to Planit Consulting. Type 'A' Elliot traps and McQuade open wire traps were utilised. Traps were set at varying of intervals of 10-20 metres depending on the habitat complexity within the surveyed vegetation remnant. | | |

<table>
<tr><th>Report / Author / Date</th><th>Survey Details</th><th>Survey Results</th><th>Fauna Spotter/catcher reports</th></tr>
<tr><td></td><td>Traps remained in place for between 36 and 48 hours and were checked and emptied (where necessary) every eight hours. Traplines were replicated twice across the survey period. Baits utilized within the traps included rolled oats & golden syrup, rolled oats & peanut butter, dog biscuits, tuna, banana, apple, sunflower seed mix, wombaroo insectivore mix and chicken. In addition selected baits were laced with aniseed or vanilla essence.<br><br>Nocturnal Survey<br>Nocturnal survey was performed during varying lunar and weather conditions (including crepuscular cycles) and included the following survey techniques:<br>• Audible survey for calls, scratching and landings;<br>• Trapping for fauna as described above;<br>• Spotlighting focusing on flowering and senescent trees, vegetated corridors, drainage lines, open grassland and canopy breaks utilising:<br>- Short duration-long distance white light, and<br>- Long duration-short distance red light<br>• Naked eye observation utilising dawn/dusk/moon light for bats and fauna returning to potential nest/shelter areas. Night sky silhouetting from forest fringes was specifically utilised to locate mega and microchiropteran bats;<br>• Amplified call recording/playback for avifauna, mammals and amphibians.<br>Survey limitations:<br>This survey did not target the Greater Glider, however arboreal mammals were the target species. It is considered likely that if the Greater Glider was present, this survey would have recorded the species.</td><td></td><td></td></tr>
<tr><td>Ecological Assessment, Karingal Drive, Pimpama, Planit Consulting, February 2007.</td><td>The subject site is located to the north of Coomera Woods and known as The Karingal Precinct.<br><br>Survey Period: January 2007<br><br>Number of Surveys: 4 (1 x diurnal meander, 1 x nocturnal meander, 1 x trapping, 1 x call playback) Minimum 2 nights to complete nocturnal surveys<br><br>Weather Conditions: Fine partly cloudy. Temperatures and rainfall was not recorded.<br><br>Season: Summer<br><br>Surveyor: Planit Ecologist<br><br>Relevant Licences:
<table>
<tr><th>Authority</th><th>Licence/Permit</th><th>Title</th><th>Expiration</th><th>Permit No.</th></tr>
<tr><td>EPA/QPWS</td><td>Scientific Purposes Permit</td><td>Wildlife Research</td><td>30 May 2009</td><td>WISP03727506</td></tr>
<tr><td>QLD DPI&F</td><td>Scientific Use Registration</td><td>Scientific Use Registration</td><td>15 February 2009</td><td>06/02204</td></tr>
<tr><td>QLD DPI&F Animal Ethics</td><td>Community Access AEC</td><td>Environmental Studies-Fauna Survey for Scientific Purposes</td><td>26 March 2009</td><td>CA 2006/03/112</td></tr>
</table>
Location: The site incorporates the following allotments accessed by Karingal Drive and Dixon Drive within the suburb of Pimpama;</td><td>This survey recorded arboreal mammals. The Greater Glider was not observed during the surveying period or recorded through scat analysis.<br><br>Recorded Arboreal mammals;<br>• Koala; and<br>• Brushtail Possum.<br><br>Statistical Analysis:<br>There was no statistical analysis. This ecological study only establishes the presence, potential occurrence or absence of fauna species. The Greater Glider was not recorded.</td><td>N/A</td></tr>
</table>

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | ▪ Lots 30 – 33 RP152382<br>▪ Lots 26 – 29 RP152380<br>▪ Lots 26 & 27 RP163789<br>▪ Lot 24 RP168217<br>  <br><br>**Subject Site Aerial**<br><br>**Survey Methodology**<br>To classify and identify faunal populations and species which occur or may occur on site, the following methodology was applied:<br>• Literature review of previous surveys undertaken within the region and Wildnet Data;<br>• Field survey of the flora communities located within and immediately adjacent to the study area to determine habitat values;<br>• Study teams' experience and knowledge of the study area and protected flora and fauna;<br>• The following detailed fauna field survey methods (refer also Attachment 4) were implemented during the month of January 2007 in general accordance with the following:<br>- Gold Coast City Council (2002) *Guidelines for Preparing Ecological Site Assessments During the Development Process: Planning Scheme Policy*. GCCC, Nerang.<br>- Department of Environment and Heritage (1999) *Suggested Conservation Criteria for Development Assessment*. DEH, Brisbane.<br>- Shire of Maroochy (1997) *Flora and Fauna Assessment Requirements for Developments in Maroochy Shire*. M.S.C<br>- Department of Land and Water Conservation (1997) *Interim Guidelines for Targeted and General Flora and Fauna Surveys under the Native Vegetation Conservation Act 1997.* NSWDLWC, Parramatta.<br>- Brisbane City Council (1999) *Ecological Assessment Guidelines*. B.C.C. | | |

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|

- NSWNPWS (2001) *The Community Biodiversity Survey Manual*. New South Wales National Parks & Wildlife Service.
- Redland Shire's *Planning Scheme Policy 4-Ecological Impacts*

All field survey was performed under the provisions of 'Scientific Purposes Permit for Fauna Trapping' (issued by Queensland Parks and Wildlife Service) and Animal Ethics Committee approval ('Scientific Survey of Fauna Species' issued by Bribie Local Animal Ethics Committee, Queensland Department of Primary Industries).

**Diurnal Survey**

- Active searches were conducted for key habitat components and potential macro- and micro- habitat components for rare and threatened species;
- Binocular search and identification of all fauna heard or sighted;
- Opportunistic sightings/audible identifications were conducted and recorded whilst all survey works were being undertaken;
- Detailed ground track/trace survey was performed including:
  - Scat/pellet examination
  - Scratch/trace examination of trees
  - Diggings, burrow, trace and track examination
  - Humus/crevice examination
  - Examination and assessment of tree hollows, hanging bark, termite mounds, flowering and nesting trees.
- Trapping for fauna was performed in accordance with permits issued to Planit Consulting. Type 'A' & 'B' Elliot traps and open wire traps (hook baited and foot paddle spring-loaded) of various sizes were utilised. Traps were set at intervals of approximately 10-20 metres depending on habitat complexity within the surveyed vegetation.

  Traps remained in place for 72 hours and were checked and emptied (where necessary) every morning. Baits utilized within the traps included rolled oats & golden syrup, rolled oats & peanut butter, dog biscuits, tuna, banana, apple, sunflower seed mix, wombaroo insectivore mix, liver and chicken. In addition selected baits were laced with aniseed or vanilla essence.

| | Elliot Traps (Type A - small) | Elliot Traps (Type B - large) | Cage Traps |
|---|---|---|---|
| No. of traplines | 2 | 2 | 2 |
| No. of nights per trapline | 3 | 3 | 3 |
| No. of traps per line | 10 | 2 | 1 |
| Total no. of trap nights | 60 | 12 | 6 |

**Nocturnal Survey**

Nocturnal survey was performed during varying lunar and weather conditions (including crepuscular cycles) and included the following survey techniques:

- Audible survey for calls, scratching and landings;
- Trapping for fauna as described above;
- Spotlighting utilising:
  - Short duration-long distance white light, and
  - Long duration-short distance red light

| Report / Author / Date | Survey Details | Survey Results | Fauna Spotter/catcher reports |
|---|---|---|---|
| | Duration on foot: One researcher on two nights for 180 minutes each night (6 person hours)<br>From vehicle: One researcher on two separate nights for 60 minutes traveling at 5-10km per hour focusing on remnant vegetation fringes and open areas<br><br>• Naked eye observation utilising dawn/dusk/moon light for bats and fauna returning to potential nest/shelter areas.<br>• Amplified call recording/playback for arboreal mammals. Playback of pre-recorded calls included the following species:<br>o Koala (*Phascolarctos cinereus adustus*)<br>o Yellow-bellied Glider (*Petaurus australis*)<br>o Sugar Glider (*Petaurus breviceps*)<br>o Squirrel Glider (*Petaurus norfolcensis*)<br><br>Calls were broadcast for approximately 5 minutes followed by a 10 minute listening period and spotlighting (for nocturnal species). Depending on the species targeted, call play-back was used at dusk, after dark and/or at dawn.<br><br>**Habitat Assessment**<br>Prior to the commencement of the abovementioned survey works on site a broad habitat assessment was conducted. The purpose of this overview was to determine which species were likely to be present based on available habitat components and to target areas for detailed surveying of protected fauna species. The site incorporated the following habitat components as a result of previous landuse, vegetation types, surrounding uses and hydraulic regime:<br>• High edge:area ratio of available habitat components increasing the likelihood of transient, aggressive species. Limited separation from edges for more secretive and sensitive species is available;<br>• Low - Moderate seasonal forage values (particularly flowering trees producing nectar) are available. Flowering species (Eucalypts, Corymbias, Melaleucas etc.) are scattered throughout the site. A forage base for frugivores (usually associated with rainforest/riparian species) is generally absent;<br>• A single hollow-bearing tree (*Corymbia intermedia* - refer Figure 6 above; GPS location 530838, 6921626) may provide a nest site for arboreal mammals or avifauna;<br>• Geomorphic variation (metasediments and alluvial deposits) and gradation between swamp and woodland vegetation communities provides some limited variation (due to previous disturbance) in available habitat types for flora and fauna;<br>• Internal and external terrestrial connectivity is limited as a result of clearing and habitat fragmentation associated with historical grazing landuses and recent developments in the local area. Some limited fauna dispersal from adjacent lots to the south may occur from time to time however 'corridor' value is marginal.<br><br>**Survey Limitations:**<br>This survey did not target the Greater Glider, however arboreal mammals were the target species. It is considered likely that if the Greater Glider was present, this survey would have recorded the species. | | |

Detailed arboreal mammal surveys conducted on and adjacent to the site covering an area of approximately 550ha found that;

- Tree hollow density was low and below mean habitat tree range (5.9 +/- 0.4 habitat trees/ha) for Coastal Dry sclerophyll Forests (Ross, 1999).
    - Within the site there exists a general scattering of hollow bearing trees (HBT) which are stocked at a recorded rate of ~0.16-17 HBT/ha.
- Tree hollow density (0.16-0.17 HBT/ha) is well below that required for the Greater Glider.
    - Hollow-bearing trees appear to be the most important factor in habitat selection in southern Queensland. Although greater gliders have a relatively small home range they are reported to be absent from forests with fewer than six habitat trees per hectare (ARCS 1999).
    - Several studies have identified that a density of four hollow-bearing trees/ha is sufficient to sustain the diversity of arboreal mammal populations in South East Queensland (Wormington et al. 2002, Maloney et al. 2002). However, some species, such as the greater glider, have been known to utilise many more tree hollows to survive (Council, 'Guideline for the provision of nest boxes').
- Greater Glider was not observed within the referral site or adajcent properties through detailed ecological surveying.
- Greater Glider was not recorded through scat analysis.

Based on informaiton provided within the table above and the extensive surveying effort it is unlikely that the species is present within the Coomera Woods site and therefore unlikley that the proposed action is to have a significant impact on the Greater Glider. The Assessment of Significance provided within Attachment 1 is therefore considered appropriate and consistent with the information provided above.

Should you have any questions concerning the referral please contact Boyd Sargeant on (07) 5526 1500.

Yours sincerely,

**Boyd Sargeant**
**Director**

**List of Attachments**
*Attachment 1 – Greater Glider Assessment of Significance*

**Assessment of Significance**

Great Glider *(Petauroides volans)*

| Species | EPBC Act Status | Habitat Description | Likelihood of Occurrence and Potential impact |
|---|---|---|---|
| Greater Glider (*Petauroides volans*) | Vulnerable | "The greater glider is an arboreal nocturnal marsupial, largely restricted to eucalypt forests and woodlands. It is primarily folivorous, with a diet mostly comprising eucalypt leaves, and occasionally flowers (Kehl & Borsboom 1984; Kavanagh & Lambert 1990; van der Ree et al., 2004). It is typically found in highest abundance in taller, montane, moist eucalypt forests with relatively old trees and abundant hollows (Andrews et al., 1994; Smith et al., 1994, 1995; Kavanagh 2000; Eyre 2004; van der Ree et al., 2004; Vanderduys et al., 2012). The distribution may be patchy even in suitable habitat (Kavanagh 2000). The greater glider favours forests with a diversity of eucalypt species, due to seasonal variation in its preferred tree species (Kavanagh 1984).<br><br>During the day it shelters in tree hollows, with a particular selection for large hollows in large, old trees (Henry 1984; Kehl & Borsboom 1984; Lindenmayer et al., 1991; Smith et al., 2007; Goldingay 2012). In Grafton/Casino, Urbenville and the Urunga/Coffs Harbour Forestry Management Areas (FMAs) in northern New South Wales (NSW), the abundance of greater gliders on survey sites was significantly greater on sites with a higher abundance of tree hollows (Andrews et al., 1994; Smith et al., 1994, 1995). In the Grafton/Casino FMA, the greater glider was absent from surveyed sites with fewer than six tree hollows per hectare (Smith et al., 1994). In southern Queensland, greater gliders require at least 2–4 live den trees for every 2 ha of suitable forest habitat (Eyre 2002). | This threatened fauna species was not observed within the referral site or adjacent surveyed properties area.<br><br>It is considered that the preferred habitat for this species is largely absent from the proposed works area as a result of limited hollows and anthropogenic disturbances.<br><br>The rate of hollowbearing trees within the site is below the required rate for this species.<br><br>The proposed action is considered unlikely to significantly impact this Matter of National Environmental Significance. |

As discussed above, this species has not been recorded within the referral site during extensive and details ecological surveys over the past 15 years. Much of the surrounding properties have been surveyed by Planit. These surveys have also resulted in no records of the Greater Glider. It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to significantly impact this species.

Based upon the locality, distribution and available habitat it is unlikely that the proposed action will:

- **Lead to a long-term decrease in the size of an important population of each species**

*An 'important population' is a population that is necessary for a species' long-term survival and recovery. This may include populations identified as such in recovery plans, and/or that are:*

1. *key source populations either for breeding or dispersal*
2. *populations that are necessary for maintaining genetic diversity, and/or*
3. *populations that are near the limit of the species range.*

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying. The potential habitat within the referral site is not considered sufficient to maintain a population of this species. It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to lead to a long-term decrease in the size of an important population.

- **Reduce the area of occupancy of an important population**

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying. The potential habitat within the referral site is not considered sufficient to maintain a population of this species. It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to reduce the area of occupancy of an important population.

- **Fragment an existing important population into two or more populations**

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying.

The potential habitat within the referral site is not considered sufficient to maintain a population of this species. The referral site is largely disturbed/modified as a result of historic land uses. The referral site is considered isolated from large intact habitats as a result of adjacent land uses.

It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to fragment an existing important population into two or more populations.

- **Adversely affect habitat critical to the survival of a species**

*Habitat critical to the survival of a species refers to areas that are necessary:*

- *For activities such as foraging, breeding, roosting, or dispersal*
- *For the long-term maintenance of the species (including the maintenance of species essential to the survival of the species)*

- *To maintain genetic diversity and long-term evolutionary development, or*
- *For the reintroduction of populations or recovery of the species.*

Critical habitat may be habitat identified in a recovery plan for the species or listed as Critical Habitat on the Register maintained by the minister under the EPBC Act. The subject site is not listed as habitat critical to the survival of a threatened fauna species within the Critical Habitat Register.

It is considered that the project site does not contain habitat critical to the survival of this species as defined within the NES Guidelines and the species profiles/studies reviewed relevant to the species.

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying.

The potential habitat within the referral site is not considered sufficient to maintain a population of this species. The referral site is largely disturbed/modified as a result of historic land uses. The referral site is considered isolated from large intact habitats as a result of adjacent land uses.

It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to adversely affect habitat critical to the survival of this species.

- **Disrupt the breeding cycle of an important population of each species**

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying.

The potential habitat within the referral site is not considered sufficient to maintain a population of this species. The referral site is largely disturbed/modified as a result of historic land uses. The referral site is considered isolated from large intact habitats as a result of adjacent land uses.

It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to disrupt the breeding cycle of an important population of this species.

- **Modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline**

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying.

The potential habitat within the referral site is not considered sufficient to maintain a population of this species. The referral site is largely disturbed/modified as a result of historic land uses. The referral site is considered isolated from large intact habitats as a result of adjacent land uses.

It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline.

- **Resulting invasive species that are harmful to the vulnerable species becoming established in**

**the vulnerable species' habitat**

Invasive flora species are common within the site (i.e. exotic grasses and herbaceous pasture weeds) and a vegetation management plan has been prepared to reduce propagule spread to retained and offsite habitats.

It is considered unlikely that the proposed action will significantly increase occurrence of invasive species that are harmful to the vulnerable species and becoming established within the species' habitat.

- **Introduce disease that may cause each species to decline**

As far as the intended use of the site as an urban development there is limited possibility of disease introduction. Potential vectors of disease (i.e. introduced fauna species) are considered unlikely to increase via the project and implementation of wash-down procedures for plant and equipment to minimize the chance of transporting weed propagules into the site is recommended within the rehabilitation plan. Protocols should also be developed to ensure such plant disease are not introduced into new locations where they may impact upon the retained habitat.

The construction and operation of the proposed action is unlikely to introduce disease that may cause either of the discussed species to decline.

- **Interfere substantially with the recovery of each species**

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying.

The potential habitat within the referral site is not considered sufficient to maintain a population of this species. The referral site is largely disturbed/modified as a result of historic land uses. The referral site is considered isolated from large intact habitats as a result of adjacent land uses.

It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline.

**Conclusion**

The proposed action is unlikely to result in a significant effect on this species as:

- This species has not been recorded within the referral site during an extensive 15 year period of detailed ecological studies.
- This species was not recorded in adjacent properties during detailed ecological surveys.
- The referral site is not considered to be occupied by an important population of this species.
- The habitat is not considered critical to the survival of this species and lacks large hollows to maintain a population of this species.

7 May 2018

s22
Assessments and Governance Branch
Department of Environment and Energy
Email: s22 @environment.gov.au

**New Information relating to the ecological corridor and Koala Habitat Assessment Score – Polaris Coomera Pty Ltd - Coomera Woods Master Planned Development (EPBC 2017/8134)**

Dear s22 ,

We refer to your email of 16 March 2018 to Polaris Coomera Pty Ltd (**Polaris**) regarding EPBC 2017/8134 and the preliminary view reached by the Department that the site on which the proposed action would take place is habitat critical to the survival of the koala.

In Polaris' email to you of 6 April Polaris noted that new information had come to our attention in relation to the corridor between the north-east corner of the Coomera Woods site and the large koala habitat area located beyond the urban footprint (the **ecological corridor**) that Polaris considered would need to be addressed. Polaris also noted that the new information was inconsistent with the assessment by the Department in relation to the preliminary view that the site contained critical habitat. The Department agreed to allow Polaris until 7 May to provide a response to the Department's critical habitat assessment.

Set out below is important information we have collected regarding the ecological corridor. This information shows that there is a series of barriers that prevent koalas moving from the koala habitat area located beyond the urban footprint (the **koala conservation area**) into the ecological corridor—including, in particular, several one direction koala exclusion fences bordering habitat areas to the north of the site—and demonstrates that the site is effectively disconnected from the koala conservation area. On the basis of this information the site cannot reasonably be regarded as part of a contiguous area that incorporates the koala conservation area, and nor, when considered as an area separated from the koala conservation area, can it reasonably be regarded as having recovery value.

The information below also includes comments regarding other aspects of the preliminary assessment set out in your email of 16 March, particularly in relation to the extent of any breeding that is occurring within the sub-population of koalas associated with the site, and in relation to the impact of disease on the assessment of the recovery value of the site.

**One direction exclusion fences preventing koala migration from the conservation area to the urban area**

The Department's assessment regarding habitat connectivity refers to information that shows koalas using the ecological corridor. On the basis of that information the Department reached the view that the

evidence demonstrates that koalas use the corridor to access the site and areas to the south, and that the ecological corridor 'is of significance in maintaining connectivity between the site and the surrounding koala habitat'. This assessment is incorrect when regard is had to other information provided with the referral. For instance, despite rigorous surveys undertaken on the site, only five koalas were found to be present, and it was demonstrated that the quality of the habitat on the site was unlikely to attract koalas from habitat to the north.

However, in addition to the information previously provided with respect to the referral, further investigations of the ecological corridor have revealed that there are one direction koala exclusion fences in place at three locations that prevent koalas from moving from the koala conservation area into the ecological corridor (and potentially onwards to the Coomera Woods site).

One direction fauna exclusion fences prevent fauna from crossing the fence from the one side (the exclusion side), but allows fauna to cross the fence from the opposite side. The one-direction koala exclusion fence design used at the Gainsborough Greens estate is generally in accordance with TMR Fauna Sensitive Road Design Manual. Refer to Queensland Department of Main Roads drawing no. 1603 (included as Figure 2). This design is a standard chain-wire fence (typically 1.8m high) with a 60cm strip of sheet metal attached beneath the top of the fence on the one side (the exclusion side) of the fence only and in accordance with Note 6 on drawing 1603. It allows arboreal fauna to cross the fence from the non-exclusion side by means of a drop down method towards the exclusion side (TMR, 2010; Habitat, 2013). It also includes a concrete strip directly below the fence which prevents fauna from burrowing under the fence. This type of fence is used extensively to prevent arboreal fauna from crossing into road reserves while at the same time allowing any such fauna that are in the road reserve to escape.

The one direction koala exclusion fences erected at the Gainsborough Greens estate are located at the following locations as shown on Figure 1:

- *Location 1: the interface between the Gainsborough Greens residential development and the koala conservation area (refer to figure 1).*

The Gainsborough Greens estate is located directly north of Yawalpah road, straddles the ecological corridor and adjoins the koala conservation area. A continuous one-direction koala fence had been constructed between the conservation area and the Gainsborough Greens development precincts (e.g. residential and open space precincts). This design is a standard chain-wire fence with a 60cm strip of sheet metal attached beneath the top of the fence on the side of the conservation area.

The strip inhibits arboreal fauna from climbing the exclusion side of the fence, preventing access to the urban area and the ecological corridor from the conservation area. As the 60cm metal sheeting is only installed on the one side of the exclusion fencing, koalas are able to escape from Gainsborough Greens to the conservation area by climbing the fence on the urban side and dropping down into retained vegetation on the opposite side.

The installation of such fencing has been found effective in restricting koala movement across main roads and changing koala movement behaviours (Jones et al, 2013). These one-direction fences allow koalas to move from the Gainsborough Greens development into the koala conservation area but does not allow koalas to move out of the koala conservation area.

- *Location 2: along Gainsborough Drive (refer to figure 1).*

Gainsborough Drive is a two lane road that cross the corridor approximately 300m north of Yawalpah Road. A one direction koala fence is constructed along only the northern boundary of Gainsborough Drive. The one-direction koala exclusion fence is erected such that it excludes movement from the north towards the south. As there is no exclusion fence along the southern side of Gainsborough Drive, koalas can still cross the road and move northwards – in the direction of the koala conservation area

- *Location 3: along Yawalpah Road (refer to figure 1).*

A one-direction koala exclusion fence is constructed on the northern boundary of Yawalpah road reserve; The one-direction koala exclusion fence adjoins residential acoustic / koala exclusion fence on either side of the ecological corridor. Koalas can thus not move around the one-direction koala exclusion fence. There is no fence on the southern boundary of Yawalpah Road reserve.

Again, the one-direction koala exclusion fence is erected such that it excludes movement from the north towards the south. It is thus not possible for koalas within the Gainsborough Greens ecological open space to cross the fence into Yawalpah Road and move southwards within the ecological corridor or towards the urban footprint.

As there is no fence along the southern boundary of Ywalpah Road, koalas can however cross the road and move northwards – out of the urban footprint and towards the koala conservation area

At each of these above mentioned locations, koalas are able to move from the south to the north, but are unable to move from the north within the ecological corridor.

The presence of these fences, and the inability of koalas to move from the koala conservation area to the urban areas in the south, is consistent with the empirical evidence obtained from the surveys conducted on the site that there are only a small number of koalas using the site. Despite that the site is used by that small number of koalas, the ecological corridor does not allow for recruitment of koalas from the northern koala conservation area and thus results in a sink, where mortality rates exceed breeding and recruitment.


**Figure 1: Location of one direction fauna exclusion fencing (Source: Google Maps, 2018)**

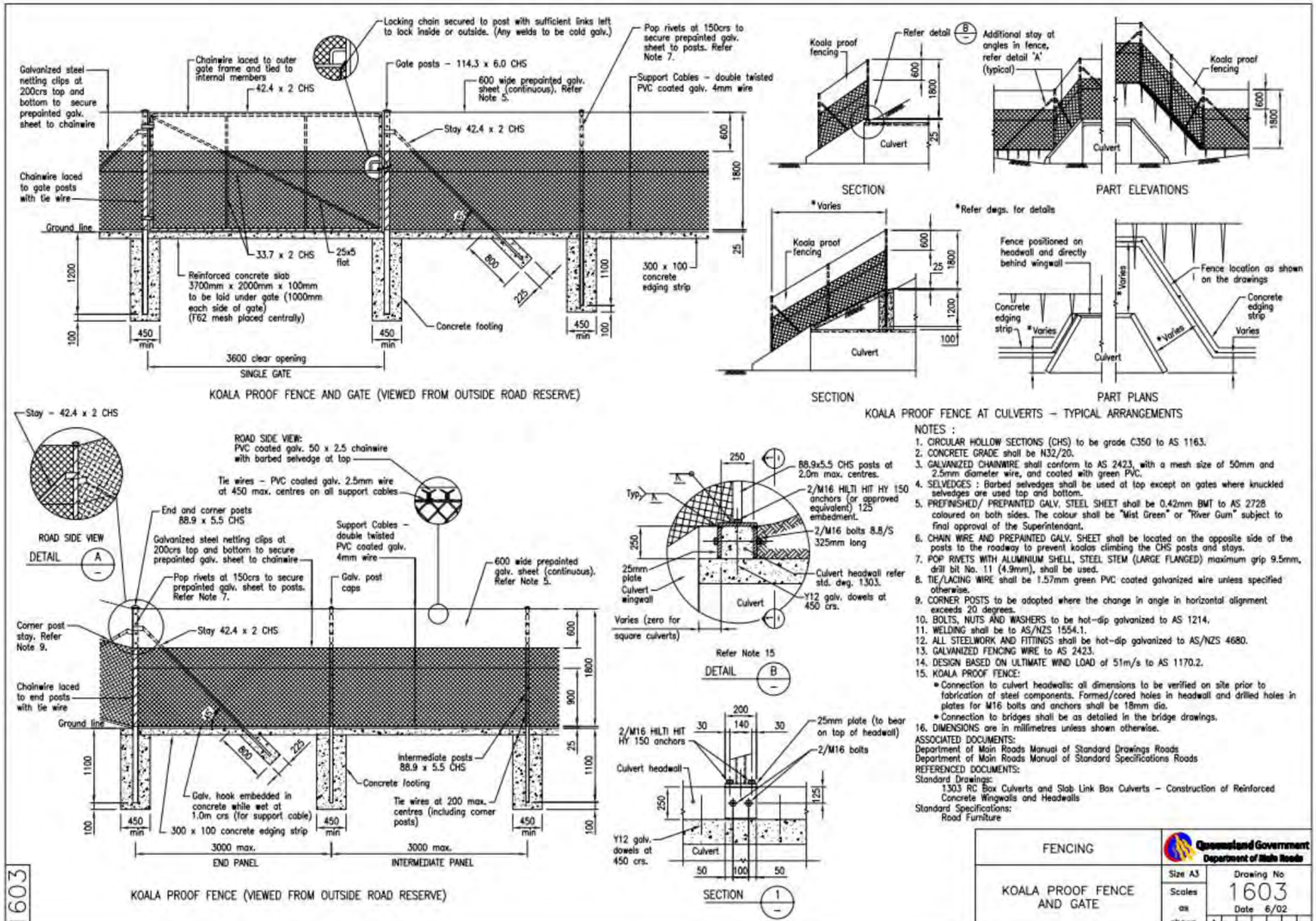



**Figure 2: TMR Fauna Sensitive Road Design Standard Drawing 1603**

**Figure 3: one direction koala fencing at the interface between Gainsborough Greens Development and the koala conservation area (Location 1)**

**Figure 4: one direction koala fencing at the interface between Gainsborough Greens Development and the koala conservation area (Location 1)**

**Figure 5: One direction exclusion fencing along Gainsborough Drive (Location 2)**

**Figure 6: One direction exclusion fencing along northern side of Yawalpah Road (Location 3)**

**Use of one direction exclusion fences to control the movement of koalas**

*One direction Fauna Exclusion Fence - Design & function*

The one direction fauna exclusion fencing constructed as part of the Gainsborough Greens development are generally in accordance with the Department of Transport and Main Roads (Qld) *Fauna Sensitive Road Design Manual, Volume 2: Preferred Practices, drawing 1603* (refer to Figure 2).

This design is a standard chain-wire fence (typically 1.8m high) with a 60cm strip of sheet metal attached beneath the top of the fence on the one side of the fence. The strip inhibits arboreal fauna from climbing the exclusion side of the fence. It does however allow arboreal fauna to climb the non-exclusive side of the fence and cross the fence by dropping down on the exclusive side. The fence prevents access to the roads and ecological corridor from the conservation area.

As the 60cm metal sheeting is only installed on the one side of the exclusion fencing, koalas are able to escape from roadways and urban areas to the conservation area by climbing the fence on the road way side and dropping down into retained vegetation on the opposite side.

A concrete strip is inserted along the bottom of the fence – preventing animals from burrowing under the fence.

This design effectively deters koala movement from the conservation area to the ecological corridor.

*Application of one direction fauna exclusion fences*

One direction koala fences are widely used in Queensland and New South Wales to prevent koalas from moving onto roads and reduce the incidence of koala strikes by vehicles. These fences however also allow koalas, that may find its way into the road reserve or within urban area, the means to scale the fence and escape using a drop-down method.

One direction koala exclusion fences are widely used along roads developed or upgraded by the QLD Department of Transport and Main Roads. Projects include upgrades of the Bruce Highway and sections of roads near Kawartha Forest to guide fauna to appropriate crossing structures.

New South Wales road projects include the $4.36 billion Woolgoolga to Ballina Pacific Highway which include a number permanent koala exclusion fences in key locations in Wardell, an upgrade jointly funded by the Australian and NSW governments. The koala exclusion fences have been installed in accordance with the Conditions of Approval for the upgrade as part of the project's Koala Management Plan.

The Tweed Coast Comprehensive Koala Plan of Management (2015) includes the use of fauna exclusion fencing within the Koala Area Precincts and Koala Linkage Precincts to facilitate the safe movement of koalas through the landscape while mitigating potential vehicle strikes.

It is noted that one direction fauna exclusion fencing has been incorporated into the landscape design for the Gainsborough Greens development at the request of the City of Gold Coast to allow arboreal fauna access to the conservation areas and restrict movement from the conservation areas to the urban landscape.

The *East Coomera Koala Population Study 2017* prepared by Biolink also recommended further installation of one direction koala exclusion fencing around the conservation areas and rural landscape to prevent koalas dispersing out of these areas and into the high-risk urban landscape (pg. 61 & 71).

*The effectiveness of the one direction fauna exclusion fences*

The installation of such fencing has been found effective in restricting koala movement across main roads and changing koala movement behaviours (Jones et al, 2013). This study recorded a koala crossing a major road numerous times prior to installation of one direction fauna exclusion fencing, approaching the road on 38 occasions and crossing 19 times (50% approach-crossing ration). Post construction the animal approached the road 11 times along the fauna-exclusion fence side, none of these approaches resulted in the koala crossing the road.

**Additional barriers to movement of koalas at Yawalpah Road**

Yawalpah Road is planned as a four lane road. The northern two lanes as well as the earthworks for the future (southern) two lanes are constructed across the ecological corridor. Roadworks are under way to the east of the ecological corridor to extend the northern two lanes of Yawalpah road to the intersection with Kerkin road, replacing the old existing two lane road.

There are a series of hydraulic culverts within the ecological corridor and crossing underneath Yawalpah Road. Council road design drawings show that the culverts are 1.8m in diameter. The culverts extend under the Yawalpah Road embankment and are approximately 40m long.

The length of piping and absence of fauna furniture and permanent inundation would preclude movements through them by koalas from the conservation areas to the ecological corridor.

The culvert outlets are located north of the Yawalpah road reserve boundary and thus north of the one direction fauna exclusion fence. The culverts are partially submerged and aquatic plants are growing at both the inlet and outlet of the culverts, indicating that the culverts are permanently submerged (refer to Figure 7). Koalas cannot cross through the culverts and move from the north to the south.

Koalas can however cross the road reserve from the south (e.g. from urban development in the south), cross the fence on the northern boundary and move towards the koala conservation area in the north.

**Figure 7: Partially submerged culverts under Yawalpah Road, north outlet**

**Response to Departmental critical habitat assessment**

*Habitat connectivity*

The Department's assessment regarding habitat connectivity refers to evidence from various reports to the effect that koalas are safely using the ecological corridor. While the evidence referred to demonstrates historical use of the corridor it does not show that koalas have used the corridor to move from the conservation area through to the Coomera Woods site in a way that would allow the ecological corridor to be properly understood as establishing a contiguous area between the conservation area and the Coomera Woods site. The presence of koalas in the corridor does not demonstrate that it is used as a means of koalas accessing the Coomera Woods site from the conservation area to the north. As demonstrated in the information provided with the referral, the disturbed nature of the Coomera Woods site, mean that the corridor cannot be expected to have the effect of recruiting koalas to the Coomera Woods site.

The evidence, therefore, does not support the finding in the preliminary assessment that, 'koalas use this corridor to access the site and areas to the south, and that the corridor is of significance in maintaining connectivity between the site and surrounding koala habitat'.

The new information now provided regarding the hard barriers to movement created by the one-direction fauna fences demonstrates that movement of koalas from the conservation area in the north to the Coomera Woods site is not possible.

Therefore, whereas the preliminary assessment was made on the basis that the Department 'cannot foresee a reason as to why koalas will not continue to use this corridor and also do[es] not see any

reason as to why the corridor will not be maintained over time', clearly the corridor is not being maintained, especially for the purpose of movement of koalas from the north to the south.

Relevantly, the *East Coomera Koala Population Study 2017* prepared by Biolink also recommended further installation of one direction koala exclusion fencing around the conservation areas and rural landscape to prevent koalas dispersing out of these areas and into the high-risk urban landscape (pg. 61 & 71), further restricting interaction between the rural and urban koala sub-populations.

Because the site cannot reasonably be regarded as part of a contiguous landscape greater than 300 Ha, the correct score for habitat connectivity should be 0.

*Recovery value*
The Department's assessment regarding recovery value includes the following statements:

> *Large and connected: The contextually large size of the referral site and its increased connectivity meet the recovery objectives.*
>
> *Viable sub-population: While the Department does not consider the referral site itself is of sufficient size to be genetically robust or operate as a viable sub-population, the site may contribute to supporting a viable sub-population within the east Coomera area. The East Coomera Koala Population Study 2017 indicates the east Coomera area contains a viable sub-population of koalas.*
>
> *Breeding: According to the East Coomera Koala Population Study 2017, the east Coomera koala sub-population has remained relatively stable, with a population estimate of approximately 500 individuals in both 2006-07 and 2017. This sub-population has remained stable despite the removal of 180 koalas. The Department considers the maintenance of a stable sub-population over this period, when 180 koalas have been removed, indicates breeding is occurring in the sub-population.*
>
> *Maintain connectivity: The site is part of a large connected area of koala habitat (refer to habitat connectivity discussion above).*

*Large and connected*

As has been demonstrated above, the site is not large and connected, and is not part of a large connected area of koala habitat.

Does the site support a viable sub-population?

Because the site (and the urban koala area) is functionally disconnected from the larger conservation area to the north, whether the referral site is able to support a viable sub-population must be considered on the basis that the sub-population on the site is separated from the sub-population in the conservation area.

As the comments above correctly reflect, 'the referral site itself is [not] of sufficient size to be genetically robust or operate as a viable sub-population'. While they remain outside the conservation area, the koalas located in the urban koala area do not represent a viable sub-population.

Furthermore, the East Coomera Koala Population Study 2017 estimates that a minimum viable population (MVP) would require 170 individuals and approximately 1500 hectares of suitable habitat (Biolink 2007b). On no measure does the population on the site, nor in the urban koala area, meet those requirements. Comprehensive surveys found only five koalas located on the site. The population of the urban koala area has been estimated to be limited to 80 koalas (Biolink 2017, p. 49 & 57).

As noted in the information submitted with the referral, the Koala Referral Guidelines state:

*In most cases, the value of these three attributes [i.e. habitat connectivity, existing threats and recovery value] in urban areas is likely to be zero as the existing effects of habitat loss, fragmentation, vehicle strike, dog attack and other threats have and are likely to continue to degrade these areas over the medium to long-term."* (Pg. 25)

The Biolink 2017 report on page 49 also include the following statement:

*"It is very clear that the urban sub-population in the emerging Coomera Town Centre section of the urban area is at significant risk and is unlikely to be viable over the longer term." (pg 49)*

The Coomera Woods site does not support a genetically robust and viable sub-population. It does not meet the interim recovery objectives in this regard.

Disease

Additionally, a consideration within the interim recovery objective refers to koalas that are '*free of disease or have a very low incidence of disease*'. The following extracts from *East Coomera Koala Translocation Program* are noted in relation to the health of koalas in the Coomera area:

"*of the Koalas examined for the project, around 40% had some clinical signs of illness or disease ranging from conjunctivitis, cystitis, reproductive tract disease, gingivitis, gastro-intestinal candidiasis, poor body condition, bacterial infection, toxaemia/septicaemia anaemia and bone marrow disease."*

The report goes on to state;

*"the health assessment have raised serious concerns regarding overall health of the local koala population, particularly in relation to chlamydial infection*", with 21% of Koala examined testing positive for Chlamydia.

In the Biolink 2017 report (p20) it is recorded that 14.3% of adult males and 26.1% of adult females observed (by detection through binoculars) showed obvious signs of disease *(i.e.* cystitis and/or conjunctivitis) .

The report further provide that:

*Disease poses an ongoing threat to koalas in urban landscapes where resident koalas are likely to face added nutritional and social stress associated with limited available habitat and safe dispersal opportunities, and in some cases elevated koala densities*

The koala sub-population within the urban koala area are not disease free and neither does it have a low incidence of disease.

The interim recovery objective is not met in this regard

*Breeding*

The Department's assessment regarding recovery value include the following statements:

*According to the East Coomera Koala Population Study 2017, the east Coomera koala sub-population has remained relatively stable, with a population estimate of approximately 500 individuals in both 2006-07 and 2017. This sub-population has remained stable despite the removal of 180 koalas. The Department considers the maintenance of a stable sub-population*

*over this period, when 180 koalas have been removed, indicates breeding is occurring in the sub-population.*

The koala population estimates mentioned by the Department relate to the population within the entire East Coomera area (Biolink 2017 terminology), which in the 2007 report prepared by Biolink (Conserving koalas in the Coomera-Pimpama Koala Habitat Area: a view to the Future. Final report prepared for the Gold Coast City Council. March 2007 (**Biolink 2007**)) was referred to as the Coomera – Pimpama Koala Habitat Area and divided into two parts namely, the Urban Koala Area (UKA) and the Koala Conservation Area (KCA). The 180 koalas were translocated from the UKA.

The Biolink 2017 report estimates that the overall koala population for the entire East Coomera area, which includes both the urban and rural koala sub-populations, is relatively the same as the results from over a decade ago, namely:

- 2006-07 population estimate: 510 (±129)
- 2017 population estimate: 499 (±74)

It is to be expected that the koala population within the conservation area would be breeding. However, in order to assess whether the koalas within the urban footprint are breeding, it is necessary to review the corresponding koala population estimates. The following figures are relevant:

- The Biolink 2007 report (p.7) estimated that 70% of the East Coomera population (356 koalas) resided within the UKA; and
- 180 koalas were translocated from the UKA (Biolink 2017, p.5)

From the abovementioned numbers, it is evident that, (ignoring all natural reproduction of the remaining koalas during this decade) the current population should be 356 – 180 = 176 koalas.

However, the Biolink 2017 report (p.57) state that only up to approximately 80 koalas are currently still likely to reside in the UKA. If these Biolink figures are correct, there has been a very considerable negative koala population growth within the koala populations located within the urban footprint.

The koala population estimates in the Biolink 2017 report do not point to successful breeding amongst the fragmented urban koala population within the urban footprint. On the contrary, the latest population estimates support the scientific position in the referral that the population within the urban footprint will decline over time.

The referral site does not meet the recovery objectives in relation to breeding.

*Maintain corridors and connective habitat that allow movement of koalas between large areas of habitat*

As has been demonstrated above, the site is not large and connected, and is not part of a large connected area of koala habitat.

The interim recovery objective is not met in this regard

Department's assessments regarding recovery value not supported by the evidence

For these reasons, the Department's assessments with respect to the site being large and connected, part of a large connected area of koala habitat, and capable of supporting a viable sub-population cannot reasonably be regarded as correct. Nor does the evidence support that sufficient breeding is occurring to support the maintenance and stability of a viable sub-population.

Conclusion regarding recovery value

Having regard to all of this information, the correct score to be attributed for recovery value is 0.

**Summary regarding habitat assessment tool**

The presence of koalas on the site, and the types of vegetation on the site support scores of 2 against koala occurrence and vegetation composition.

In both the prior and contemporary assessment of the project via the Koala Habitat Assessment Tool completed by two separate consultants and by the Department (twice), key existing threats are attributed a score of '0'. This is assigned because of evidence of frequent or regular koala mortality from vehicle strike or dog attack within the study area at present. These threats exist now and are likley to increase on all sides of the project site.

The one direction koala exclusion fencing installed at the three locations in associated with the Gainsborough Greens development function as a complete physical barrier to koala movement from the conservation area to the ecological corridor. As a result, koalas from the conservation area are unable to access the referral site.

The conservation areas are not sufficiently connected to the referral site to support the remaining individuals within Coomera Woods. The reduced breeding opportunities between the two sub-populations has caused Coomera Woods to become a sink and the sub-population within unsustainable.

The lack of connectivity between the site and the conservation area to the north affects both the score against habitat connectivity and recovery value. As is demonstrated above, the evidence indicates that the correct score for both attributes is zero.

The overall score for the habitat assessment tool is 4, the referral site is not considered to be critical to the survival of the koala.

**Overall conclusion**

The new information supports and strengthens the conclusions reached in the referral that the proposed development of Coomera Woods will not, nor is it likely to have, a significant impact on a vulnerable species for the purposes of section 18 (4) of the EPBC Act

If you should have any queries, please do not hesitate to call Boyd Sargeant on (07) 5526 1500.

**Boyd Sargeant**
**Director**

**References**


- Biolink (2007a) Koala habitat and population assessment for the Gold Coast City LGA. Final report to Gold Coast City Council. Biolink Ecological Consultants.
- Biolink (2007b). Conserving Koalas in the Coomera-Pimpama Koala habitat area: a view to the future. Final Report to Gold Coast City Council. Biolink Ecological Consultants.
- Biolink (2017) East Coomera Koala Population Study 2017 prepared for City of Gold Coast.
- Department of Main Roads (2008) Bruce Highway (Cooroy to Curra) Strategic Planning Study, Recommended Corridor Report, Appendix B Fauna Movement and Road Impact Mitigation (Biodiversity Assessment and Management)
- GeoLINK (2016) Tyagrah to Brunswick heads koala Grids.
- Habitat (2013) Gainsborough Greens Koala Management Master Plan.
- Jones et al. (2013) Koala Retrofit Works Program, Evaluation Monitoring for Koala-Specific Overpass Structure. For the Department of Transport and Main Roads
- Queensland Government (2009) Koala Safety Fencing and Measures Guideline, A guideline for the draft South East Queensland Koala Conservation State Planning Regulatory Provisions
- Queensland Parks and Wildlife (2006) Nature Conservation (Koala) Conservation Plan 2006 and Management Program 2006-2016
- RPS (2015) Bruce Highway Upgrade – Caloundra road to Sunshine Motorway Project, EPBC 2015/7464.
- TMR (2010) Fauna Sensitive Road Design Manual, Vol. 2.
- Tweed Shire Council (2015) Tweed Coast Comprehensive Koala Plan of Management.

# IMPACTS OF PROPOSED CLEARING ACTIVITY ON KOALA HABITAT LOCATED AT 49 GEORGE ALEXANDER WAY, COOMERA IN THE CITY OF GOLD COAST LGA, SOUTH-EASTERN QLD.

Report to Compliance and Enforcements Branch, Australian Government Department of Environment

June, 2015

s47F
Managing Director/Principal Ecologist
Biolink Ecological Consultants
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Tel: 02 6679 5523

## 1. Introduction

This report has been prepared in response to a request from the Australian Government Department of the Environment (DoE) for expert advice regarding the presence and quality of koala habitat associated with a proposed clearing action at 49 George Alexander Way (Lot 44 SP207822) Coomera in south-east Queensland.

The nature of the above-mentioned expert advice was to include:

a) A determination as to the extent, type and quality of koala habitat on the property,

b) A determination as to whether a koala population was currently using the site, or, if there were signs that koalas persist on site despite the translocation of koalas from the site in July 2014,

c) If a koala population exists on site, a determination as to the potential population number, and

d) Provide a reasoned opinion of the consequences that clearing of the action will have, or is likely to have on the koala habitat, with reference to the following documents:

    (i) EPBC Act referral guidelines for the vulnerable koala (guidelines for proponents to determine whether their action will need to be referred to the Department for assessment under the EPBC Act).
    (ii) Threatened Species Scientific Committee Listing Advice on the vulnerable koala - *Phascolarctos cinereus* (combined populations of Qld, NSW and the ACT).

## 2. Experience

I am a research scientist/specialist koala ecologist with over 40 years of experience in koala conservation and management, aspects of which have included work with Local, State and Federal Government agencies, non-government organisations, local and indigenous community groups and the private sector. My Doctoral thesis focused on koala ecology, examining issues of home range use, population structure

and dynamics, while also developing new techniques for identifying food tree species and procedures for habitat assessment generally. I have participated in various expert workshops on biodiversity and koala conservation, written book chapters and had scientific papers on various aspects of Australian natural history, koala management and conservation published in peer-reviewed scientific journals. For my work on koalas I am a laureate of the Smithsonian Institute, an honorary life member of the Koala Preservation Society of Australia, and have been awarded a place on the Tree of Life by the Friends of the Koala.

In my capacity as a research scientist I convened and taught undergraduate courses in Ecology, Conservation Biology and Wildlife Management for the Science Faculty, Griffith University from 2000 – 2006. I remain an adjunct Senior Lecturer at this institution and have an ongoing and active association with senior academic staff and *post*-graduate students. I have directly supervised a number of *post*-graduate research projects ranging from conservation biology of threatened species and the application of dendro-ecology to elucidate disturbance history in forest ecosystems, to conservation risk assessment and reptile systematics.

I am the Managing Director and Principal Ecologist of Biolink Pty Ltd, a consultancy company which amongst other things specialises in landscape-scale koala habitat and population assessments. My current consultancy and research interests continue to focus on survey techniques and how best to facilitate greater planning and conservation certainty for threatened species and biodiversity values. A copy of my *Curriculum Vitae*, along with a list of selected consultancies completed by my company is appended to this report as Attachment 1.

## 3. Assessment

*a) Background Documentation*

For the purposes of undertaking the assessment and preparing this report I was provided with Version 5 (September 2014) of a *Koala Conservation Plan for East Coomera 2014 – 2018* prepared by the Planning and Environment Directorate (lead author: John Callaghan), City of Gold Coast.

*b) Familiarity with the site*

I am familiar with the site in 2006 having conducted a 350 m x 350 m grid-based koala habitat and population assessment across the Coomera – Pimpama area and

other parts of the Gold Coast City LGA. The results of this assessment in a broader context are detailed in two separate reports as follows:

1. Koala Habitat and Population Assessment for Gold Coast City LGA (Phillips *et al* 2007a), and
2. Conserving Koalas in the Coomera – Pimpama Koala Habitat Area: a view to the future (Phillips *et al* 2007b).

The 2007 reports included assessments of native vegetation (mid- and tallest-stratum species > 100 mm dbh at each of 200 field sites distributed at 350 m intervals (i.e. 12.25 ha grid cells) across the Coomera - Pimpama area, 15 of which were located on property being the subject of this assessment. Of direct relevance to this particular assessment and the associated expert advice that has been requested is the following data and derived information that can be extracted from the preceding reports:

1. Preferred koala food trees in the Coomera – Pimpama area were determined to be Forest Red Gum, *Eucalyptus tereticornis*, Tallowwood *E. microcorys* and Grey Gum *E. propinqua*.
2. The assessments indicated that approximately 87% of the site (i.e. 13 of the 15 sampled field sites) supported significant koala activity levels consistent with occupancy/use by resident koala populations.
3. Koala density across the site and adjoining areas was estimated at 0.23 ± 0.03 (SE) koalas $ha^{-1}$

*c) Site Inspection & Assessment*

Under the authority of a warrant issued pursuant to Sec 409 of the EPBC Act I accessed the site accompanied by DoE officers Nathan O'Brien, Drew McLean and Ben Phillips, along with representatives of the property owner/proponent.

The initial focus of assessment was directed towards a predominately foot-based traverse of the site, the intent of which was to examine the extent and health of remnant native vegetation and to revisit/reassess each of the aforementioned 15 field sites by scoring them for the presence/absence of koala activity using the presence of diagnostic koala faecal pellets beneath preferred food trees. Given advice that 13 koalas had been translocated from the site during the course of 2013 (J. Callaghan pers. comm.) the search for koala pellets was restricted to the surface layer of leaf

litter only so as not to unearth older pellets which may have persisted beneath the leaf litter.

## 4. Results

The site was inspected on the 13th May, 2015 during which each of the 15 sites originally assessed in 2006 were revisited (Figure 1). The order of the site inspection followed the route P091, P071, P073, P056, P043, P027, P019, P029, P045, P031, P047, P058, P060, P075 and P093. In the company of the attending parties I estimate that approximately 4,500 meters of forest was traversed over the course of the day.


**Figure 1**. The subject property (red Polygon) indicating the locations for each of 15 field sites re-examined for evidence of use by koalas. These same sites were originally sampled in 2006 as part of a detailed assessment of koalas and their habitat in the Gold Coast City LGA.

*Existing vegetation*

The site presents as heavily disturbed with a simplified mid- and lower- strata commensurate with a history of under-scrubbing and low-intensity fires. Regardless, there appears to have been little modification of the tallest stratum, my notes to this

end on the day of the assessment concordant with data sheets/summaries for each of the 15 sites in 2006.

Koala activity in the form of diagnostic koala faecal pellets was recorded at 5 of the 15 sites (Sites P019, P029, P045, P058 and P071), as well as being observed elsewhere around the bases of Tallowwoods and Grey Gums most commonly on the traverses between Sites P027 to P019 and thereafter between P019 through to P058.

The aforementioned field sites and incidental localities where koala faecal pellets were observed are detailed in Figure 2.


**Figure 2.** Field sites within which koala faecal pellets were recorded, as well as the locations of incidental observations of koala faecal pellets that were observed during traverses between sites.

*Outcomes*.

Notwithstanding the earlier translocation of koalas off the site in 2013, the results of this assessment have established that evidence of koalas on the site remains relatively widespread. Moreover, the distribution of faecal pellets and spatial autocorrelation of the sites within which scats were located further implies the presence of resident koalas with established home range areas more than it does transient activity. Put more simply, the results of the field survey imply the presence of a resident population of koalas occupying approximately one third of the site (Occupancy estimate = 33.33% ± 12.81 %(SD).

In an ecological context the appropriate management response to the preceding information would be to create a minimum convex polygon (MCP) with vertices at Sites P071, P019 and P058 to create what is referred to as an *Extent of Occurrence* for koalas on the site. This MCP/EoO would then need to be buffered so as to accommodate the spatial uncertainty associated with the survey grid (i.e. 350m/2 = 175m), the end result of which would be a revised MCP/EoO that encapsulates almost the entire site. These two concepts are illustrated in Figure 3 wherein it should be noted that the initial MCP/EoO clearly does not capture the full extent of observed koala activity on the site (i.e. all locations at which fecal pellets were observed), whereas the buffered MCP/EoO has clearly captured all koala activity.


**Figure 3**. Minimum Convex Polygons encompassing koala activity on the subject site. Note that the inner blue polygon based on field sites at 350 m intersections does not adequately incorporate all known areas of habitat use whereas the outer and larger of the two MCPs does.

## 5. Discussion

*(i) Extent, type and quality of koala habitat on the property*

The greater proportion of the subject site is located on a low-nutrient soil landscape derived from underlying metasediments, the associated soils supporting communities of Eucalypt woodland – forest that commonly contain three tree species known to be preferentially utilized by koalas, namely, Tallowwood *E. microcorys*, Grey Gum *E. propinqua* and Forest Red Gum *E. tereticornis*. One or more of these species was present in all but one of the 15 field sites that were assessed (Table 1), implying that approximately 93% of the habitat on the site would qualify as high-quality koala habitat.

**Table 1**. Presence (√) / absence(-) of preferred koala food tree species at each of the 15 field sites inspected for the purposes of this report (field sites wherein koala faecal pellets were recorded are underlined).

| **Site No** | *E.mic* | *Epro* | *Eter* |
|---|---|---|---|
| P019 | - | - | √ |
| <u>P071</u> | √ | √ | - |
| P073 | - | - | √ |
| P056 | - | - | - |
| P043 | - | √ | - |
| P027 | - | √ | - |
| <u>P019</u> | - | √ | - |
| <u>P029</u> | √ | √ | - |
| <u>P045</u> | √ | √ | - |
| P031 | √ | - | - |
| P047 | - | √ | - |
| <u>P058</u> | √ | √ | - |
| P060 | - | √ | - |
| P075 | - | √ | - |
| P093 | - | √ | - |

*(ii) whether a koala population is currently using the site or otherwise persisting despite the translocation event in 2014.*

The observations reported herein indicate that a koala population <u>is</u> currently using the site. As best as I can ascertain based on the results of the field assessment, at

least 33% of the site or approximately 61 ha is occupied by koalas. I have been reliably advised that koalas were last translocated off the site towards the end of 2013 (J. Callaghan, pers comm).

*(iii) numbers of koalas*

I estimate the numbers of koalas to be present on the site to be approximately 15 animals, this being the product of the number of hectares estimated be occupied (i.e. 61) multiplied by the density estimate of 0.23 koalas $ha^{-1}$ previously established for this area in 2006.

*(iv) consequences of a clearing action*

Habitat loss is identified in the EPBC Act referral guidelines and the Threatened Species Scientific Committee listing advice for the koala as one of the key contributing factors driving koala population decline.

It is my opinion that consideration of the EPBC Act referral guidelines would warrant referral of a proposed clearing action in this instance because of the following considerations:

(i) The site readily meets criteria warranting recognition as habitat critical to the survival of the koala (Part 6, habitat assessment tool scores as follows: Koala occurrence 2+, Vegetation composition 2+, Habitat connectivity 0, Key existing threats 2+, Recovery value 1),

(ii) The proposed action will have an adverse effect on the aforementioned habitat (Part 7 pathway as follows: yes – yes – no – no - yes), and

(iii) There are no effective impact mitigation strategies in place (Part 8 refers).

**Overall conclusion**

Clearing of the site will result in the removal of native vegetation that includes food tree species that the resident koala population currently occupying the site requires for survival. In the absence of an effective impact mitigation strategy clearing of the site will thus result in a forced dispersal of koalas into adjoining residential areas where they will be killed by domestic dogs, run over by motor vehicles and/or succumb to disease.

I am confident the extent of development surrounding this site is such that the viability and long-term persistence of the resident koala population on the site will be

significantly compromised should clearing and subsequent development of the site proceed.

## 6. Declaration

The matters stated in this report are factual to the best of my knowledge and based entirely on the data I have collected. The opinions stated in the report remain my own and I have referenced all matters I consider to be significant.


s47F
Managing Director
25th June, 2015

**References**.

Phillips, S., Hopkins, M., and Callaghan, J.( 2007a). *Koala Habitat and Population Assessment for the Gold Coast City LGA***.** Final Report to Gold Coast City Council. Biolink Ecological Consultants.

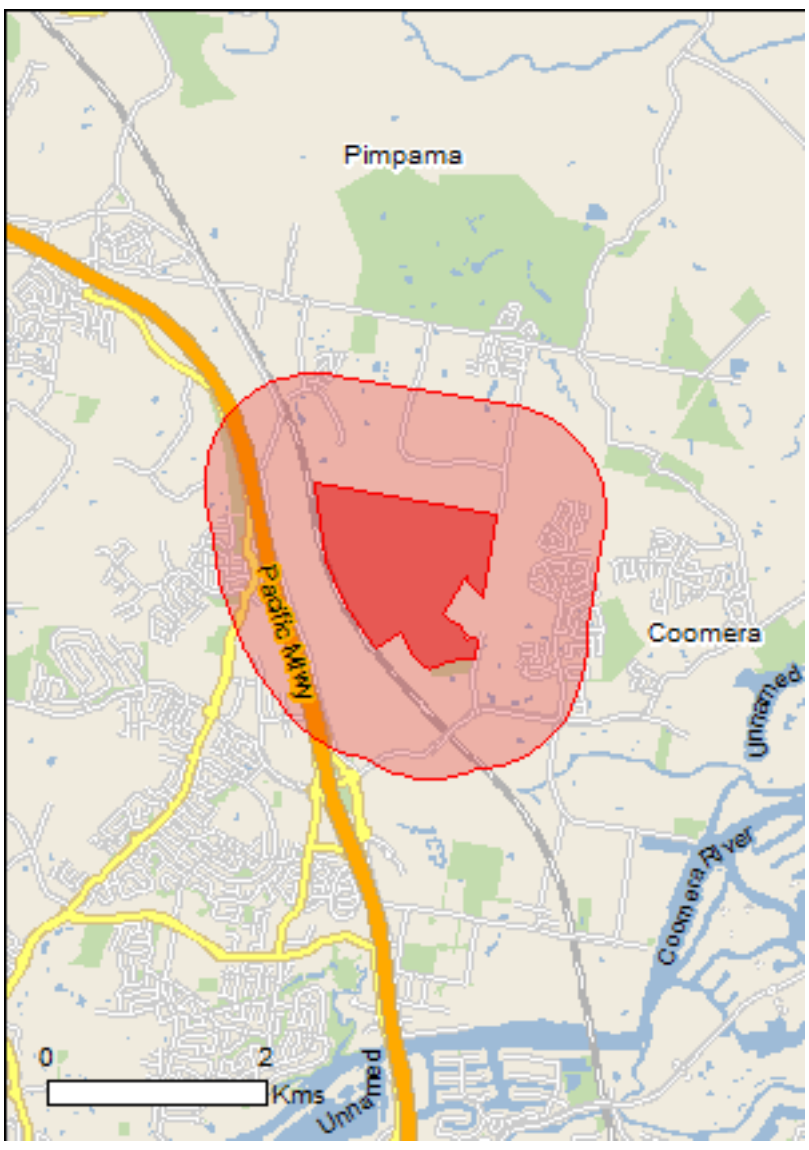
Phillips, S., Hopkins, M., and Callaghan, J. (2007b). *Conserving Koalas in the Coomera-Pimpama Koala Habitat Area: a view to the future*. Final Report to Gold Coast City Council. Biolink Ecological Consultants.

# EPBC Act Protected Matters Report

This report provides general guidance on matters of national environmental significance and other matters protected by the EPBC Act in the area you have selected. Please see the caveat for interpretation of information provided here.

Report created: 26/06/18 13:41:40





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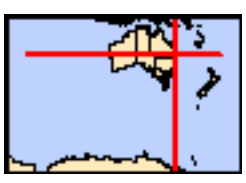

# Summary

## Matters of National Environment Significance

| | |
|---|---|
| World Heritage Properties: | None |
| National Heritage Places: | None |
| Wetlands of International Importance: | 1 |
| Great Barrier Reef Marine Park: | None |
| Commonwealth Marine Area: | None |
| Listed Threatened Ecological Communities: | 3 |
| Listed Threatened Species: | 39 |
| Listed Migratory Species: | 17 |

## Other Matters Protected by the EPBC Act

| | |
|---|---|
| Commonwealth Land: | None |
| Commonwealth Heritage Places: | None |
| Listed Marine Species: | 24 |
| Whales and Other Cetaceans: | None |
| Critical Habitats: | None |
| Commonwealth Reserves Terrestrial: | None |
| Commonwealth Reserves Marine: | None |

## Extra Information

This part of the report provides information that may also be relevant to the area you have nominated.

| | |
|---|---|
| State and Territory Reserves: | None |
| Regional Forest Agreements: | None |
| Invasive Species: | 33 |
| Nationally Important Wetlands: | None |
| EPBC Act Referrals: | 23 |
| Key Ecological Features (Marine) | None |

# Details

## Matters of National Environmental Significance

### Wetlands of International Importance (Ramsar) [ Resource Information ]

| Name | Proximity |
|---|---|
| Moreton bay | Within 10km of Ramsar |

### Listed Threatened Ecological Communities [ Resource Information ]

For threatened ecological communities where the distribution is well known, maps are derived from recovery plans, State vegetation maps, remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.

| Name | Status | Type of Presence |
|---|---|---|
| Coastal Swamp Oak (Casuarina glauca) Forest of New South Wales and South East Queensland ecological community | Endangered | Community likely to occur within area |
| Lowland Rainforest of Subtropical Australia | Critically Endangered | Community may occur within area |
| Subtropical and Temperate Coastal Saltmarsh | Vulnerable | Community likely to occur within area |

### Listed Threatened Species [ Resource Information ]

| Name | Status | Type of Presence |
|---|---|---|
| Birds | | |
| Anthochaera phrygia<br>Regent Honeyeater [82338] | Critically Endangered | Foraging, feeding or related behaviour likely to occur within area |
| Botaurus poiciloptilus<br>Australasian Bittern [1001] | Endangered | Species or species habitat known to occur within area |
| Calidris canutus<br>Red Knot, Knot [855] | Endangered | Species or species habitat likely to occur within area |
| Calidris ferruginea<br>Curlew Sandpiper [856] | Critically Endangered | Species or species habitat likely to occur within area |
| Dasyornis brachypterus<br>Eastern Bristlebird [533] | Endangered | Species or species habitat may occur within area |
| Erythrotriorchis radiatus<br>Red Goshawk [942] | Vulnerable | Species or species habitat likely to occur within area |
| Geophaps scripta scripta<br>Squatter Pigeon (southern) [64440] | Vulnerable | Species or species habitat may occur within area |
| Lathamus discolor<br>Swift Parrot [744] | Critically Endangered | Species or species habitat likely to occur within area |
| Limosa lapponica baueri<br>Bar-tailed Godwit (baueri), Western Alaskan Bar-tailed Godwit [86380] | Vulnerable | Species or species habitat known to occur within area |
| Limosa lapponica menzbieri<br>Northern Siberian Bar-tailed Godwit, Bar-tailed Godwit (menzbieri) [86432] | Critically Endangered | Species or species habitat may occur within area |
| Numenius madagascariensis<br>Eastern Curlew, Far Eastern Curlew [847] | Critically Endangered | Species or species habitat known to occur within area |
| Poephila cincta cincta<br>Southern Black-throated Finch [64447] | Endangered | Species or species |

| Name | Status | Type of Presence |
|---|---|---|
| | | habitat may occur within area |
| Rostratula australis<br>Australian Painted Snipe [77037] | Endangered | Species or species habitat may occur within area |
| Turnix melanogaster<br>Black-breasted Button-quail [923] | Vulnerable | Species or species habitat may occur within area |
| **Frogs** | | |
| Mixophyes fleayi<br>Fleay's Frog [25960] | Endangered | Species or species habitat likely to occur within area |
| **Insects** | | |
| Argynnis hyperbius  inconstans<br>Australian Fritillary [88056] | Critically Endangered | Species or species habitat may occur within area |
| **Mammals** | | |
| Chalinolobus dwyeri<br>Large-eared Pied Bat, Large Pied Bat [183] | Vulnerable | Species or species habitat may occur within area |
| Dasyurus maculatus  maculatus (SE mainland population)<br>Spot-tailed Quoll, Spotted-tail Quoll, Tiger Quoll (southeastern mainland population) [75184] | Endangered | Species or species habitat likely to occur within area |
| Petauroides volans<br>Greater Glider [254] | Vulnerable | Species or species habitat known to occur within area |
| Phascolarctos cinereus (combined populations of Qld, NSW and the ACT)<br>Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory) [85104] | Vulnerable | Species or species habitat known to occur within area |
| Potorous tridactylus  tridactylus<br>Long-nosed Potoroo (SE mainland) [66645] | Vulnerable | Species or species habitat may occur within area |
| Pseudomys novaehollandiae<br>New Holland Mouse, Pookila [96] | Vulnerable | Species or species habitat likely to occur within area |
| Pteropus poliocephalus<br>Grey-headed Flying-fox [186] | Vulnerable | Foraging, feeding or related behaviour known to occur within area |
| Xeromys myoides<br>Water Mouse, False Water Rat, Yirrkoo [66] | Vulnerable | Species or species habitat known to occur within area |
| **Plants** | | |
| Arthraxon hispidus<br>Hairy-joint Grass [9338] | Vulnerable | Species or species habitat may occur within area |
| Baloghia marmorata<br>Marbled Balogia, Jointed Baloghia [8463] | Vulnerable | Species or species habitat may occur within area |
| Bosistoa transversa<br>Three-leaved Bosistoa, Yellow Satinheart [16091] | Vulnerable | Species or species habitat likely to occur within area |
| Corchorus cunninghamii<br>Native Jute [14659] | Endangered | Species or species habitat likely to occur within area |
| Cryptocarya foetida<br>Stinking Cryptocarya, Stinking Laurel [11976] | Vulnerable | Species or species habitat may occur within area |
| Endiandra floydii<br>Floyd's Walnut [52955] | Endangered | Species or species habitat likely to occur within area |
| Macadamia integrifolia<br>Macadamia Nut, Queensland Nut Tree, Smooth-shelled Macadamia, Bush Nut, Nut Oak [7326] | Vulnerable | Species or species habitat likely to occur within area |

| Name | Status | Type of Presence |
|---|---|---|
| Macadamia tetraphylla | | |
| Rough-shelled Bush Nut, Macadamia Nut, Rough-shelled Macadamia, Rough-leaved Queensland Nut [6581] | Vulnerable | Species or species habitat may occur within area |
| Phaius australis | | |
| Lesser Swamp-orchid [5872] | Endangered | Species or species habitat likely to occur within area |
| Planchonella eerwah | | |
| Shiny-leaved Condoo, Black Plum, Wild Apple [17340] | Endangered | Species or species habitat likely to occur within area |
| Plectranthus habrophyllus | | |
| [64589] | Endangered | Species or species habitat likely to occur within area |
| Samadera bidwillii | | |
| Quassia [29708] | Vulnerable | Species or species habitat likely to occur within area |
| Thesium australe | | |
| Austral Toadflax, Toadflax [15202] | Vulnerable | Species or species habitat may occur within area |
| Reptiles | | |
| Delma torquata | | |
| Adorned Delma, Collared Delma [1656] | Vulnerable | Species or species habitat may occur within area |
| Saiphos reticulatus | | |
| Three-toed Snake-tooth Skink [88328] | Vulnerable | Species or species habitat may occur within area |

## Listed Migratory Species [ Resource Information ]

* Species is listed under a different scientific name on the EPBC Act - Threatened Species list.

| Name | Threatened | Type of Presence |
|---|---|---|
| Migratory Marine Birds | | |
| Apus pacificus | | |
| Fork-tailed Swift [678] | | Species or species habitat likely to occur within area |
| Migratory Terrestrial Species | | |
| Cuculus optatus | | |
| Oriental Cuckoo, Horsfield's Cuckoo [86651] | | Species or species habitat known to occur within area |
| Hirundapus caudacutus | | |
| White-throated Needletail [682] | | Species or species habitat known to occur within area |
| Monarcha melanopsis | | |
| Black-faced Monarch [609] | | Species or species habitat known to occur within area |
| Monarcha trivirgatus | | |
| Spectacled Monarch [610] | | Species or species habitat known to occur within area |
| Myiagra cyanoleuca | | |
| Satin Flycatcher [612] | | Species or species habitat known to occur within area |
| Rhipidura rufifrons | | |
| Rufous Fantail [592] | | Species or species habitat likely to occur within area |
| Migratory Wetlands Species | | |
| Actitis hypoleucos | | |
| Common Sandpiper [59309] | | Species or species habitat likely to occur within area |
| Calidris acuminata | | |
| Sharp-tailed Sandpiper [874] | | Species or species habitat known to occur within area |
| Calidris canutus | | |
| Red Knot, Knot [855] | Endangered | Species or species habitat likely to occur within area |
| Calidris ferruginea | | |
| Curlew Sandpiper [856] | Critically Endangered | Species or species habitat likely to occur |

| Name | Threatened | Type of Presence |
|---|---|---|
| | | within area |
| Calidris melanotos<br>Pectoral Sandpiper [858] | | Species or species habitat may occur within area |
| Gallinago hardwickii<br>Latham's Snipe, Japanese Snipe [863] | | Species or species habitat may occur within area |
| Limosa lapponica<br>Bar-tailed Godwit [844] | | Species or species habitat known to occur within area |
| Numenius madagascariensis<br>Eastern Curlew, Far Eastern Curlew [847] | Critically Endangered | Species or species habitat known to occur within area |
| Pandion haliaetus<br>Osprey [952] | | Species or species habitat known to occur within area |
| Tringa nebularia<br>Common Greenshank, Greenshank [832] | | Species or species habitat likely to occur within area |

## Other Matters Protected by the EPBC Act

| Listed Marine Species | | [ Resource Information ] |
|---|---|---|
| * Species is listed under a different scientific name on the EPBC Act - Threatened Species list. | | |
| Name | Threatened | Type of Presence |
| Birds | | |
| Actitis hypoleucos<br>Common Sandpiper [59309] | | Species or species habitat likely to occur within area |
| Anseranas semipalmata<br>Magpie Goose [978] | | Species or species habitat may occur within area |
| Apus pacificus<br>Fork-tailed Swift [678] | | Species or species habitat likely to occur within area |
| Ardea alba<br>Great Egret, White Egret [59541] | | Species or species habitat likely to occur within area |
| Ardea ibis<br>Cattle Egret [59542] | | Species or species habitat may occur within area |
| Calidris acuminata<br>Sharp-tailed Sandpiper [874] | | Species or species habitat known to occur within area |
| Calidris canutus<br>Red Knot, Knot [855] | Endangered | Species or species habitat likely to occur within area |
| Calidris ferruginea<br>Curlew Sandpiper [856] | Critically Endangered | Species or species habitat likely to occur within area |
| Calidris melanotos<br>Pectoral Sandpiper [858] | | Species or species habitat may occur within area |
| Cuculus saturatus<br>Oriental Cuckoo, Himalayan Cuckoo [710] | | Species or species habitat known to occur within area |
| Gallinago hardwickii<br>Latham's Snipe, Japanese Snipe [863] | | Species or species habitat may occur within area |
| Haliaeetus leucogaster<br>White-bellied Sea-Eagle [943] | | Species or species |

| Name | Threatened | Type of Presence |
|---|---|---|
| | | habitat known to occur within area |
| Hirundapus caudacutus<br>White-throated Needletail [682] | | Species or species habitat known to occur within area |
| Lathamus discolor<br>Swift Parrot [744] | Critically Endangered | Species or species habitat likely to occur within area |
| Limosa lapponica<br>Bar-tailed Godwit [844] | | Species or species habitat known to occur within area |
| Merops ornatus<br>Rainbow Bee-eater [670] | | Species or species habitat may occur within area |
| Monarcha melanopsis<br>Black-faced Monarch [609] | | Species or species habitat known to occur within area |
| Monarcha trivirgatus<br>Spectacled Monarch [610] | | Species or species habitat known to occur within area |
| Myiagra cyanoleuca<br>Satin Flycatcher [612] | | Species or species habitat known to occur within area |
| Numenius madagascariensis<br>Eastern Curlew, Far Eastern Curlew [847] | Critically Endangered | Species or species habitat known to occur within area |
| Pandion haliaetus<br>Osprey [952] | | Species or species habitat known to occur within area |
| Rhipidura rufifrons<br>Rufous Fantail [592] | | Species or species habitat likely to occur within area |
| Rostratula benghalensis (sensu lato)<br>Painted Snipe [889] | Endangered* | Species or species habitat may occur within area |
| Tringa nebularia<br>Common Greenshank, Greenshank [832] | | Species or species habitat likely to occur within area |

## Extra Information

| Invasive Species | [ Resource Information ] |
|---|---|

Weeds reported here are the 20 species of national significance (WoNS), along with other introduced plants that are considered by the States and Territories to pose a particularly significant threat to biodiversity. The following feral animals are reported: Goat, Red Fox, Cat, Rabbit, Pig, Water Buffalo and Cane Toad. Maps from Landscape Health Project, National Land and Water Resouces Audit, 2001.

| Name | Status | Type of Presence |
|---|---|---|
| Birds | | |
| Acridotheres tristis<br>Common Myna, Indian Myna [387] | | Species or species habitat likely to occur within area |
| Anas platyrhynchos<br>Mallard [974] | | Species or species habitat likely to occur within area |

| Name | Status | Type of Presence |
|---|---|---|
| Carduelis carduelis<br>European Goldfinch [403] | | Species or species habitat likely to occur within area |
| Columba livia<br>Rock Pigeon, Rock Dove, Domestic Pigeon [803] | | Species or species habitat likely to occur within area |
| Lonchura punctulata<br>Nutmeg Mannikin [399] | | Species or species habitat likely to occur within area |
| Passer domesticus<br>House Sparrow [405] | | Species or species habitat likely to occur within area |
| Streptopelia chinensis<br>Spotted Turtle-Dove [780] | | Species or species habitat likely to occur within area |
| Sturnus vulgaris<br>Common Starling [389] | | Species or species habitat likely to occur within area |
| **Frogs** | | |
| Rhinella marina<br>Cane Toad [83218] | | Species or species habitat known to occur within area |
| **Mammals** | | |
| Bos taurus<br>Domestic Cattle [16] | | Species or species habitat likely to occur within area |
| Canis lupus familiaris<br>Domestic Dog [82654] | | Species or species habitat likely to occur within area |
| Felis catus<br>Cat, House Cat, Domestic Cat [19] | | Species or species habitat likely to occur within area |
| Lepus capensis<br>Brown Hare [127] | | Species or species habitat likely to occur within area |
| Mus musculus<br>House Mouse [120] | | Species or species habitat likely to occur within area |
| Oryctolagus cuniculus<br>Rabbit, European Rabbit [128] | | Species or species habitat likely to occur within area |
| Rattus norvegicus<br>Brown Rat, Norway Rat [83] | | Species or species habitat likely to occur within area |
| Rattus rattus<br>Black Rat, Ship Rat [84] | | Species or species habitat likely to occur within area |
| Sus scrofa<br>Pig [6] | | Species or species habitat likely to occur within area |
| Vulpes vulpes<br>Red Fox, Fox [18] | | Species or species habitat likely to occur within area |
| **Plants** | | |
| Alternanthera philoxeroides<br>Alligator Weed [11620] | | Species or species habitat likely to occur within area |
| Cabomba caroliniana<br>Cabomba, Fanwort, Carolina Watershield, Fish Grass, Washington Grass, Watershield, Carolina Fanwort, Common Cabomba [5171] | | Species or species habitat likely to occur within area |
| Chrysanthemoides monilifera<br>Bitou Bush, Boneseed [18983] | | Species or species habitat may occur within area |

| Name | Status | Type of Presence |
|---|---|---|
| Chrysanthemoides monilifera subsp. rotundata<br>Bitou Bush [16332] | | Species or species habitat likely to occur within area |
| Cryptostegia grandiflora<br>Rubber Vine, Rubbervine, India Rubber Vine, India Rubbervine, Palay Rubbervine, Purple Allamanda [18913] | | Species or species habitat likely to occur within area |
| Hymenachne amplexicaulis<br>Hymenachne, Olive Hymenachne, Water Stargrass, West Indian Grass, West Indian Marsh Grass [31754] | | Species or species habitat likely to occur within area |
| Lantana camara<br>Lantana, Common Lantana, Kamara Lantana, Large-leaf Lantana, Pink Flowered Lantana, Red Flowered Lantana, Red-Flowered Sage, White Sage, Wild Sage [10892] | | Species or species habitat likely to occur within area |
| Opuntia spp.<br>Prickly Pears [82753] | | Species or species habitat likely to occur within area |
| Parthenium hysterophorus<br>Parthenium Weed, Bitter Weed, Carrot Grass, False Ragweed [19566] | | Species or species habitat likely to occur within area |
| Sagittaria platyphylla<br>Delta Arrowhead, Arrowhead, Slender Arrowhead [68483] | | Species or species habitat likely to occur within area |
| Salix spp. except S.babylonica, S.x calodendron & S.x reichardtii<br>Willows except Weeping Willow, Pussy Willow and Sterile Pussy Willow [68497] | | Species or species habitat likely to occur within area |
| Salvinia molesta<br>Salvinia, Giant Salvinia, Aquarium Watermoss, Kariba Weed [13665] | | Species or species habitat likely to occur within area |
| Senecio madagascariensis<br>Fireweed, Madagascar Ragwort, Madagascar Groundsel [2624] | | Species or species habitat likely to occur within area |
| **Reptiles** | | |
| Hemidactylus frenatus<br>Asian House Gecko [1708] | | Species or species habitat likely to occur within area |

## EPBC Act Referrals [ Resource Information ]

Further details about the referral or advice - including its current status if still active - are available in its PINK report; click on the title.

| Referral | | | |
|---|---|---|---|
| Title | Reference | Referral Outcome | Assessment Status |
| GCCC Northern Wastewater Strategy and associated Reclaimed Water Scheme - Stage | 2001/282 | NCA | Referral Decision Made-Completed |
| Dreamworld Town Centre Development | 2001/484 | NCA | Referral Decision Made-Completed |
| Jacobs Well Airport Project | 2003/947 | | Withdrawn-Completed |
| Jacobs Well Airport | 2004/1361 | | Withdrawn-Completed |
| Kerkins Levee Rehabilitation Project, Phases 2-8 | 2004/1435 | NCA-PM | Referral Decision Made-POST-APPROVAL/COMPLIANCE |
| Vegetation clearing for the Gainsborough Park Residential Estate | 2012/6667 | NCA | Referral Decision Made-Completed |
| Residential Development on Finnegan Way, Coomera, QLD | 2012/6685 | | Withdrawn-Completed |
| Clearing of vegetaion for a residential subdivision on Karingal Drive, Pimpama, QLD | 2013/6716 | NCA | Referral Decision Made-Completed |
| Residential subdivision, 54-64 Karingal Drive, Pimpama, Qld | 2013/6739 | NCA | Referral Decision Made-Completed |
| Low impact industrial development and associated infrastructure, Old Pacific Highway, Coomera | 2013/6819 | NCA | Reconsidered-Completed |
| Coomera, QLD | 2013/7104 | | Withdrawn-Completed |

| | | | |
|---|---|---|---|
| Develop Stage 1 & 2 (Lots 21, 23 & 24), Coomera Urban Village, Cnr Foxwell Rd & Finnegan Wy, Coomera, QLD | 2014/7124 | NCA | Referral Decision Made-Completed |
| Nambucca Crescent residential subdivision Pimpama, QLD | 2014/7190 | CA | Approval Decision Made-Post-Approval |
| Residential Development Stages 4 & 9-10 Big Sky Estate, Coomera, QLD | 2014/7192 | NCA | Referral Decision Made-Completed |
| To develop high and medium density residential dwellings, commercial precincts and open space areas, Foxwell Road, Coomera, QLD | 2014/7291 | NCA | Referral Decision Made-Completed |
| Coomera Town Centre shopping centre development, Coomera Qld | 2014/7292 | NCA | Referral Decision Made-Completed |
| Heavy Rail Duplication Project, Coomera to Helensvale, Qld | 2014/7392 | NCA | Referral Decision Made-Completed |
| Mixed use development, Lot 138, 62 Finnegan Way, Coomera, Qld | 2015/7488 | NCA | Referral Decision Made-Completed |
| Improving rabbit biocontrol: releasing another strain of RHDV, sthrn two thirds of Australia | 2015/7522 | NCA | Referral Decision Made-Close |
| Residential development, Big Sky Estate (Stages 5-8), Coomera | 2015/7535 | NCA | Referral Decision Made-Completed |
| Coomera Woods master planned residential development, Qld | 2015/7610 | | Withdrawn-Close |
| Coomera Woods Master Planned Development, 49 & 51 George Alexander Way, Coomera, Qld | 2017/8134 | RD | Referral Published-Publish Case |
| Coomera Woods Protection Zone, 49 George Alexander Way, Coomera Qld | 2018/8214 | RD | Referral Published-Publish Case |

# Caveat

The information presented in this report has been provided by a range of data sources as acknowledged at the end of the report.

This report is designed to assist in identifying the locations of places which may be relevant in determining obligations under the Environment Protection and Biodiversity Conservation Act 1999. It holds mapped locations of World and National Heritage properties, Wetlands of International and National Importance, Commonwealth and State/Territory reserves, listed threatened, migratory and marine species and listed threatened ecological communities. Mapping of Commonwealth land is not complete at this stage. Maps have been collated from a range of sources at various resolutions.

Not all species listed under the EPBC Act have been mapped (see below) and therefore a report is a general guide only. Where available data supports mapping, the type of presence that can be determined from the data is indicated in general terms. People using this information in making a referral may need to consider the qualifications below and may need to seek and consider other information sources.

For threatened ecological communities where the distribution is well known, maps are derived from recovery plans, State vegetation maps, remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.

Threatened, migratory and marine species distributions have been derived through a variety of methods. Where distributions are well known and if time permits, maps are derived using either thematic spatial data (i.e. vegetation, soils, geology, elevation, aspect, terrain, etc) together with point locations and described habitat; or environmental modelling (MAXENT or BIOCLIM habitat modelling) using point locations and environmental data layers.

Where very little information is available for species or large number of maps are required in a short time-frame, maps are derived either from 0.04 or 0.02 decimal degree cells; by an automated process using polygon capture techniques (static two kilometre grid cells, alpha-hull and convex hull); or captured manually or by using topographic features (national park boundaries, islands, etc). In the early stages of the distribution mapping process (1999-early 2000s) distributions were defined by degree blocks, 100K or 250K map sheets to rapidly create distribution maps. More reliable distribution mapping methods are used to update these distributions as time permits.

Only selected species covered by the following provisions of the EPBC Act have been mapped:

- migratory and
- marine

The following species and ecological communities have not been mapped and do not appear in reports produced from this database:

- threatened species listed as extinct or considered as vagrants
- some species and ecological communities that have only recently been listed
- some terrestrial species that overfly the Commonwealth marine area
- migratory species that are very widespread, vagrant, or only occur in small numbers

The following groups have been mapped, but may not cover the complete distribution of the species:

- non-threatened seabirds which have only been mapped for recorded breeding sites
- seals which have only been mapped for breeding sites near the Australian continent

Such breeding sites may be important for the protection of the Commonwealth Marine environment.

# Coordinates

-27.837961424306 153.32270929535,-27.844052040175 153.32155058105,-27.842913633287 153.32034895142,-27.842610056099 153.32032749374,-27.842610056099 153.32024166306,-27.842648003294 153.32004854401,-27.843065421562 153.3197481366,-27.845266327686 153.31835338791,-27.845721681998 153.31899711807,-27.846101142464 153.31957647522,-27.846708276449 153.32032749374,-27.846954923659 153.32015583237,-27.847106706279 153.32037040909,-27.846935950817 153.32064935883,-27.84718259751 153.3212072583,-27.848591581224 153.32082649,-27.848553636109 153.32027931937,-27.848544149828 153.31992526778,-27.848781306603 153.31864853628,-27.849198701267 153.31772585638,-27.849312535897 153.31717868574,-27.849056407812 153.3167495323,-27.848060348398 153.31571956404,-27.846874551454 153.31489344366,-27.846570985352 153.31482907065,-27.847766271965 153.3127905918,-27.846722768509 153.31188936957,-27.844521891939 153.3101727558,-27.841410231622 153.30871363409,-27.837311811107 153.3079411579,-27.835717939096 153.30772658118,-27.837956943122 153.32270403631,-27.837961424306 153.32270929535

# Acknowledgements

This database has been compiled from a range of data sources. The department acknowledges the following custodians who have contributed valuable data and advice:

-Office of Environment and Heritage, New South Wales
-Department of Environment and Primary Industries, Victoria
-Department of Primary Industries, Parks, Water and Environment, Tasmania
-Department of Environment, Water and Natural Resources, South Australia
-Department of Land and Resource Management, Northern Territory
-Department of Environment and Heritage Protection, Queensland
-Department of Parks and Wildlife, Western Australia
-Environment and Planning Directorate, ACT
-Birdlife Australia
-Australian Bird and Bat Banding Scheme
-Australian National Wildlife Collection
-Natural history museums of Australia
-Museum Victoria
-Australian Museum
-South Australian Museum
-Queensland Museum
-Online Zoological Collections of Australian Museums
-Queensland Herbarium
-National Herbarium of NSW
-Royal Botanic Gardens and National Herbarium of Victoria
-Tasmanian Herbarium
-State Herbarium of South Australia
-Northern Territory Herbarium
-Western Australian Herbarium
-Australian National Herbarium, Canberra
-University of New England
-Ocean Biogeographic Information System
-Australian Government, Department of Defence
-Forestry Corporation of NSW
-Geoscience Australia
-CSIRO
-Australian Tropical Herbarium, Cairns
-eBird Australia
-Australian Government – Australian Antarctic Data Centre
-Museum and Art Gallery of the Northern Territory
-Australian Government National Environmental Science Program
-Australian Institute of Marine Science
-Reef Life Survey Australia
-American Museum of Natural History
-Queen Victoria Museum and Art Gallery, Inveresk, Tasmania
-Tasmanian Museum and Art Gallery, Hobart, Tasmania
-Other groups and individuals

The Department is extremely grateful to the many organisations and individuals who provided expert advice and information on numerous draft distributions.

Please feel free to provide feedback via the Contact Us page.

**From:** Rose Adams
**To:** EPBC Referrals
**Subject:** EBPC Referral - 2017/8134- Submission Gecko Environment Council
**Date:** Wednesday, 17 January 2018 4:00:55 PM
**Attachments:** 20180116_SUB_EPBC_referral_Polaris (003).pdf

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Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
epbc.referrals@environment.gov.au

Dear Sir/ Madam

EBPC Referral - 2017/8134
Polaris Coomera PTY LTD Residential Development/Lot 7, 49 George Alexander Way, Coomera 4209
Coomera Woods Master Planned Development, 49 & 51 George Alexander Way, Coomera 4209

Attached please find a submission from Gecko Environment Council on the above referral. Thank you for your consideration of the issues we raise.

Kind regards
Rose Adams, Secretary

Gecko Environment Council Association Inc
ABN 90 689 258 843
Gecko House, 139 Duringan St, Currumbin Qld 4223
Phone +61 (0)7 5534 1412 | Email s47F | www.gecko.org.au

gecko Environment Council

Gecko Environment Council Assn Inc. ABN 90 689 258 843
Gecko House, 139 Duringan Street, Currumbin QLD 4223
+61 7 5534 1412 office@gecko.org.au gecko.org.au

16th January 2018

Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
epbc.referrals@environment.gov.au

Dear Sir/ Madam

**EBPC Referral - 2017/8134**

**Polaris Coomera** PTY LTD Residential Development/Lot 7, 49 George Alexander Way, Coomera 4209

**Coomera Woods** Master Planned Development, 49 & 51 George Alexander Way, Coomera 4209

I write on behalf of Gecko Environment Council. Gecko Environment Council Assoc. Inc. (Gecko) is a not-for-profit environment association founded in 1989 and has been active for the past 28 years in protecting the environmental values and ecological sustainability of the Gold Coast, Queensland and, when appropriate, nationally. Gecko's Mission is "*To actively promote, conserve and restore the natural environment and improve the sustainability of the built environment of the Gold Coast region in partnership with our member groups and the wider community.*"

East Coomera has been found to be the home of a viable population of koalas and every effort must be made to maintain and sustain that population. The major pressure on the viability of this population is habitat clearing for development followed by vehicle strike, dog attacks and subsequent disease from stress. Koalas in South East Queensland are listed as vulnerable and so far little of real constructive value has been done to ensure this listing is not upgraded. Action by all three levels of Government to ensure the continued viability of the East Coomera population is essential for this iconic and very vulnerable animal.

Gecko recognizes that development companies have the right to develop their property and that a population of koalas is generally not a reason to prevent development, though this is a consideration that the EPBC Assessment Unit must make based on the evidence presented. At the very least any major development in the East Coomera area that threatens this viable population must be declared a controlled action.

Gecko has noted that the Polaris Company referral documents seek to use mainly data from studies of koala population on their site done in 2006 and 2007 with some additional limited data undertaken by Planit during 2017. Their argument fails to adequately recognize that there have been vast changes in the landscape of the East Coomera area since 2007, including a decrease of koala habitat by 34%, and that these must be taken into account in

their referral to the Environment Assessment Branch. Further the proponent's Fauna Management Plan 2014 is out of date as most of the changes to the surrounding areas occurred from 2015 -2017 and ongoing. This particularly true in view of the proponent's claim that the habitat on their site is of poor quality. The proponent must be required to produce an updated fauna management plan, preferably under the requirements set by a controlled action.

The Polaris development on 147 ha will result in development of 137ha leaving only 10.15 ha for open space and conservation, less than 10% of the site. This density of development will be detrimental to the existing population of koalas as it is unlikely that much of the 10.15 ha will be specifically suitable habitat for koalas. The developer states that development will apparently occur in stages over 15 years and that this gradual clearing of the site will aid dispersal of the existing population. However as development in adjoining areas will continue apace over that 15 years it is obvious that there will be nowhere for the koalas to disperse to. It is noted that the developer intends to create a greenspace corridor of 100m width, but as this will not connect to any other corridors or suitable habitat by the completion of the development it will be of very limited use to koalas.

The recent Biolink report "East Coomera Koala Population Study" 2017 states that the population of koalas in 2017 (499) is close to the population on 2007 (510), despite the translocation of 180 koalas away from the area post 2007. This is encouraging news for viability of this population. What is not so good is the increase in density of the population due to the incremental clearing of their habitat as development has occurred and consequent movement of koalas into the remaining habitat. The increase in density puts more pressure on the remaining habitat and some of the trees could succumb to browsing stress compounding the situation.

The Biolink Report is thorough in its research methodology and compares favourably with the very limited work undertaken by Planit on behalf of Polaris. It is obvious that there are more than 5 koalas on the Polaris property known as Coomera Woods and that the secure future of these animals must be properly made.

The proponent Polaris has claimed that their development should not be prevented or made a controlled action based on the fact that previous developments in the area were not controlled actions. This is a spurious claim as mistakes of the past cannot be used as a reason to repeat them now. Whatever the reason for these other developments not to be a controlled action (failure to refer or change in circumstances) this particular development will have a major impact on the koala population and must be considered to be a controlled action.

Regardless of Polaris view that their property does not have critical habitat or connection with other areas, the developer still has a responsibility to the protection and preservation of the existing population and cannot assume that the koalas' dispersal into neighbouring areas relieves them of this responsibility.

The East Coomera Koala Population Study 2017 states that the resident koala population:-

- "Remains the largest within the city of Gold Coast east of the M1
- Makes an important contribution to biodiversity conservation within SEQ

- Would help maintain and support overall genetic diversity
- Potential source for recruiting young koalas to reestablish koala populations in other parts of the city.
- Is a viable population provided that it is supported by appropriate management and that adequate habitat is retained. "

The East Coomera Koala Population Study 2017 recommends that at least 1500ha is set aside as a habitat reserve for the East Coomera koalas and that this is urgent if the population is not to be decimated by clearing of habitat and the other ever present threats to its existence. A condition of a controlled action of the Polaris development could be a reasonable contribution to the establishment of this reserve in a suitable area of East Coomera.

Gecko requests that this development by Polaris be either refused because of the impact on the remaining koala population of East Coomera or be conditioned by a controlled action. We further request that all subsequent development proposals for the East Coomera area are also made a controlled action so that an overall 'plan' for survival of this important population can be adhered to rather than the piecemeal situation that occurs at present.

It is the responsibility of all levels of Government to ensure that this currently viable population remains viable and a source of community pride that these koalas have a future.

Yours sincerely

s47F

Lois Levy OAM

Campaign Coordinator.

Gecko Environment Council

FOI 180918
Document 3q

**From:** s47F
**To:** EPBC Referrals
**Subject:** Referral no 2017/8134
**Date:** Monday, 15 January 2018 8:23:47 PM

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**Subject: Fwd: Referral no 2017/8134**

Referral no 2017/8134
Title: Polaris Coomera Pty Ltd/ Residential Development/Lot 7, 49 George Alexander Way, Coomera, QLD/ Coomera Woods Master Planned Development , 49 & 51 George Alexander Way, Coomera QLD 4209.

I would like to express my concern on the impact of this development to our koala population.

Koala is our national icon, and we should't trade off their habitat over developments.

Council should take action on Koala protection instead of pleasing the developers.

What makes Gold Coast unique and special is our unique life style, balance of wild life and civilisation, in recent years, we are losing the balance so fast.

Taking guests from Japan and Taiwan to Coomera, they were all shocked by Koala signs side by side with houses, and they all disappointed with government's decision, and our reputation of country so great on animal protection is in ruined.

Developments should be approved on the area with less impact on the wild life.

Kind regards,

s47F

**From:** s47F
**To:** EPBC Referrals
**Subject:** Ref: 2017/8134 Polaris Coomera Pty Ltd Residential Development Lot 7 49 George Alexander Way Coomera - Objection
**Date:** Monday, 15 January 2018 4:42:18 PM

> I wish to express my concerns on wildlife habitat harm from the above proposed development.
>
> I reside in the vicinity and I have witnessed many Koala's in the area of Coomera. With risks to their survival including major transport corridors, domestic animals and limited food sources, this development will harm the successful existence of Koalas and other native wildlife in this area.
>
> Unless wildlife habitats and corridors are maintained, their is an extreme risk of extinction of native wildlife in this area. Development can not be justified in this manner, when there are other less harmful areas to develop (where historic poorly managed development has already witnessed such extinctions).
>
> I'm concerned with the developers outdated fauna management plan, and the factual ability of koalas to access other habitat safely and effectively, in particular for territorial animals. This is a serious animal welfare issue.
>
> It is time to assure wildlife preservation as well as the liveability of these areas over development at all cost simply to give financial reward to a few.
>
> I object to this development and any further removal of wildlife habitat in this and the Coomera area.
>
>
> s47F
>
>
>

**From:** s47F
**To:** EPBC Referrals
**Subject:** Referral no 2017/8134 Title: Polaris Coomera Pty Ltd/ Residential Development/Lot 7, 49 George Alexander Way, Coomera, QLD/ Coomera Woods Master Planned Development , 49 & 51 George Alexander Way, Coomera QLD 4209
**Date:** Sunday, 14 January 2018 3:04:33 PM

My objection to: Referral no 2017/8134 Title: Polaris Coomera Pty Ltd/ Residential Development/Lot 7, 49 George Alexander Way, Coomera, QLD/ Coomera Woods Master Planned Development , 49 & 51 George Alexander Way, Coomera QLD 4209

The proposed action is a large continuous area of habitat which may allow for the long term persistence of the koala population present on site. Therefore the department considers the proposed action will result in the loss of a population which could be important to the viability of the species in the Coomera area'
'The compliance report states that clearing will result in a forced dispersal of koalas into adjoining areas where they will likely by killed by domestic dogs, encounter motor vehicle strike and/or succumb to disease'.
On Jan 2nd, the first day EPBC offices opened they resubmitted, providing new population estimates and responses.
We have many concerns about the new application including concerns over the reliability of their koala population estimates which do not align with those from other sources. In addition it contains an outdated fauna management plan which does not take into account the changed landscape of the last 3 to 4 years. The plan that koalas and other animals will simply able to disperse into adjoining habitat now is simply no longer appropriate given that a significant amount of neighbouring habitat is now already gone. This is now a significant animal welfare issue.
1.There are 350 plus koalas out there.2 Most of the habitat is to be cleared without Green Fauna Infrastructure.3.The Coomera conservation group wants better koala and koala habitat mapping 4. The Coomera conservation group and the conservation movement want a 1500 ha koala reserve nearby and safe koala corridors to it. 5. The Coomera conservation group wish to restrict urban footprint penetration into more koala habitat.. 6. The mortality rate of 90% is high above SEQ average

s47F

**From:** s47F
**To:** epbcreferrals@environment.gov.au
**Subject:** Referral no 2017/8134 Title: Polaris Coomera Pty Ltd/ Residential Development/Lot 7, 49 George Alexander Way, Coomera, QLD/ Coomera Woods Master Planned Development , 49 & 51 George Alexander Way, Coomera QLD 4209.
**Date:** Saturday, 13 January 2018 9:26:53 AM

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To register an objection to this development on the grounds that it will decimate the wildlife in the region.

Due to the resubmittal of the original application
the following to sumarise

I have many concerns about the new application including concerns over the reliability of their koala population estimates which do not align with those from other sources. In addition it contains an outdated fauna management plan which does not take into account the changed landscape of the last 3 to 4 years. The plan that koalas and other animals will simply able to disperse into adjoining habitat now is simply no longer appropriate given that a significant amount of neighbouring habitat is now already gone. This is now a significant animal welfare issue.

s47F

FOI 180918
Document 3u

**From:** s47F
**To:** EPBC Referrals
**Subject:** Reference No. 2017/8135
**Date:** Thursday, 11 January 2018 7:25:01 PM

Dear Sirs,

Reference No. 2017/8134
POLARIS COOMERA PTY LTD/Residential Development/49 George Alexander Way, Coomera , QLD, 4209/Queensland/Coomera Woods Master Planned Development, 49 & 51 George Alexander Way, Coomera, Qld

I wish to make known my objection to the above proposal, due to the site being a significant site for Koala habitat. Developing the land will cause existing koala populations to plummet even more as they have nowhere else to go due to surrounding land already being cleared.

Clearly not enough has been to done to protect Koalas in Queensland and this development will impact their safety even more, by clearing habitat and food trees, exposing them to heavy machinery, cars, dogs and humans.

To allow this development to go ahead will create a significant and immediate wild animal welfare problem and this is unacceptable to not only the Coomera area community, but to the community of Australia who want government and councils to protect these dwindling animals.

So i strongly object to this development. Many thanks for your consideration.

Yours sincerely

s47F

**From:** s47F
**To:** EPBC Referrals
**Subject:** Submission.docx
**Date:** Monday, 15 January 2018 4:33:44 PM
**Attachments:** Submission.docx

---

Dear Sir or Madam,

Please find attached my submission for proposed development: **Referral no 2017/8134**

**Title: Polaris Coomera Pty Ltd/ Residential Development/Lot 7, 49 George Alexander Way, Coomera, QLD/ Coomera Woods Master Planned Development , 49 & 51 George Alexander Way, Coomera QLD 4209.**

Kind regards,

s47F

Sent from OPPO Mail

15 January 2018

s47F

**Referral no 2017/8134**
**Title: Polaris Coomera Pty Ltd/ Residential Development/Lot 7, 49 George Alexander Way, Coomera, QLD/ Coomera Woods Master Planned Development , 49 & 51 George Alexander Way, Coomera QLD 4209.**

Dear Sir or Madam,

I am writing to express my grave concerns about; and objection to the proposed Polaris Development in Coomera, specifically **Polaris Coomera Pty Ltd/ Residential Development/Lot 7, 49 George Alexander Way, Coomera, QLD/ Coomera Woods Master Planned Development , 49 & 51 George Alexander Way, Coomera QLD 4209. Ref: 2017/8134**

This new 147ha development in East Coomera poses extreme threats to koala survival, due to its location and scale. This development threatens a large continuous area of habitat, which may allow for the long-term viability of the koala population currently residing in this location. The proposed development will result in the loss of the koala population, which is essential to the viability of the species in the Coomera area.

Clearing this land will also force the koalas to disperse out of their natural habitat and into adjoining areas of land where they will more than likely, be killed by domestic dogs, hit by motor vehicles and/or become affected by disease and eventually die. All of these threats have also been identified by the EPBC previously.

There are many alarming and misleading elements to the new application submitted by Polaris, including the reliability of their koala population estimates, which do not align with those from other sources. Additionally, it contains an outdated fauna management plan, which does not take into account the changed landscape of the last 3 to 4 years, which is immense. The plan that koalas and other animals will simply able to disperse into adjoining habitat now is simply no longer possible given that a significant amount of neighbouring habitat is now already gone. This is already a significant animal welfare issue in this area.

I am extremely concerned about the long-term survival of our national icon, the koala and other native animals that populate the Coomera area. If the koalas' natural habitat is eliminated, so are they! It is up to us now to protect these species **NOW**, now only for the ecosystem but so that future generations can also experience the natural wonders of our beautiful country. This development poses many significant issues in respect to the specific matters of national environmental significance and matters protected under the EPBC Act and I strongly object to its proposal. If you wish to discuss my submission further, please feel free to contact me anytime on s47F .

Yours Sincerely,

s47F

Queensland
Government

Department of
**Environment and
Heritage Protection**

Ref: 101/0003868-006

17 January 2018

Ms s22
Director
Queensland Assessments & Sea Dumping Assessment Section
Assessments and Governance Branch
Department of the Environment and Energy
GPO Box 787
CANBERRA ACT 2601

Dear s22

**Invitation to comment on referral EPBC 2017/8134 – Coomera Woods Master Planned development, 49 and 51 George Alexander Way, Coomera, Queensland**

Thank you for your letter dated 3 January 2018 requesting advice on whether the above action will be assessed in a manner described in Schedule 1 of the Agreement between the Commonwealth of Australia and the State of Queensland (the Bilateral Agreement) developed under Section 45 of the *Environment Protection and Biodiversity Conservation Act 1999*.

I advise the proposal will not be assessed using the EIS process in chapter 3 of the *Environmental Protection Act 1994*.

The Department of State Development, Manufacturing, Infrastructure and Planning has advised that the Coordinator-General has not received a request for declaration of this proposal as a coordinated project under Part 4 of the *State Development and Public Works Organisation Act 1971*.

Should you have any further enquiries, please contact me on telephone (07) s22

Yours sincerely

s22

**Director, Impact Assessment and Operational Support**

Level 9
400 George Street Brisbane
GPO Box 2454 Brisbane
Queensland 4001 Australia
**Telephone** + 61 7 s22
**Facsimile** + 61 7 3330 5875
**Website** www.ehp.qld.gov.au
ABN 46 640 294 485

Australian Government
Department of the Environment and Energy

## EPBC Act Cost Recovery - Fee Schedule

EPBC No: 2017/8134 Date of Fee Schedule: June 26, 2018

Project title: Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland

Assessment method: Preliminary Documentation

**Fee Schedule**

| STAGE FEES | Base fee | PART A Complexity costs (A-L, P) | PART B Complexity costs (MNO) | Total |
|---|---|---|---|---|
| **Stage 1** | $2,074 | $809 | $0 | $2,883 |
| **Stage 2** | $2,289 | $1,280 | $0 | $3,569 |
| **Stage 3** | $852 | $1,348 | $5,491 (Estimate) | $7,691 (Estimate) |
| **Stage 4** | $2,795 | $3,303 | $5,491 (Estimate) | $11,589 (Estimate) |
| **TOTAL PROJECT COST** | $8,010 | $6,742 | $10,982 (Estimate) | $25,734 (Estimate) |

**Notes:**

- For assessments by environmental impact statement - If standard guidelines are used under Section 101A(2)(a) of the EPBC Act, the Stage 1 fee will not be applicable.
- For assessments by public environmental report - If standard guidelines are used under Section 96B of the EPBC Act, the Stage 1 fee will not be applicable.
- If no further information is requested under section 95A of the EPBC Act, the Stage 1 and 2 fees will not be applicable.
- The Department advises applicants of the maximum liability for Part B complexity fees at the time of the assessment approach decision, based on the information provided in the referral documentation. Applicants have the opportunity to reduce the Part B complexity fees during the assessment process by improving the quality of information provided to the Department during Stage 2 of the assessment. These Part B complexity fees are confirmed when all the assessment documentation is provided in Stage 2, and are not payable until Stages 3 and 4 of the assessment.

**Fee Breakdown**

| | | | COMPLEXITY FEE | |
|---|---|---|---|---|
| | **CONTROLLING PROVISIONS** | | | |
| **Part A Fees** | A | Listed threatened species and ecological communities<br>1 species requires assessment | Moderate | $6,742 |
| | B | Listed migratory species<br>Not applicable. | None | $0 |
| | C | Wetlands of international importance<br>Not applicable. | None | $0 |
| | D | Environment of the Commonwealth marine area<br>Not applicable. | None | $0 |
| | E | World heritage properties<br>Not applicable. | None | $0 |
| | F | National heritage places<br>Not applicable. | None | $0 |
| | G | Nuclear actions<br>Not applicable. | None | $0 |
| | H | Great Barrier Reef Marine Park<br>Not applicable. | None | $0 |
| | I | Water Resources<br>Not applicable. | None | $0 |
| | J | Commonwealth Land/Commonwealth Agency/Commonwealth Heritage Places Overseas<br>Not applicable. | None | $0 |
| | **NUMBER OF PROJECT COMPONENTS** | | | |
| | K | Number of project components<br>Residential development - only 1 component | Low | $0 |
| | **COORDINATION WITH OTHER LEGISLATION** | | | |

| | | | | COMPLEXITY FEE |
|---|---|---|---|---|
| | L | Coordination with other legislation | Low | $0 |
| | | **ADEQUACY OF INFORMATION AND CLARITY OF PROJECT SCOPE** | | |
| | M | Site surveys/Knowledge of environment<br>Site surveys complete for all project components | Low | $0 |
| **Part B Fees: estimate (to be confirmed prior to Stage 3)** | N | Management measures (including mi igation and offsets)<br>Offsets required but none proposed | Moderate | $10,982 |
| | O | Project scope<br>Project scope is well defined with no alternatives | Low | $0 |
| | | **EXCEPTIONAL CIRCUMSTANCES** | | |
| **Exceptional circumstances** | P | Exceptional circumstances<br>N/A | False | $0 |
| **TOTAL COMPLEXITY FEES (Estimate)** | | | | $17,724 |
| **BASE FEE** | | | | $8,010 |
| **TOTAL FEE (Estimate)** | | | | $25,734 |

**Potential fees for contingent and post-approval activities (if required)**

The Department will notify you if a contingent activity fee is applicable due to an additional statutory step being required under the *Environment Protection and Biodiversity Conservation Act 1999*.

**Post-approval fees**

Evaluation of new Action Management Plan (per management plan) ($2,690)

**Contingent Fees**

Request additional information for referral or assessment approach decision ($1,701)

Variation to the proposed action ($1,353)

Reconsidera ion of the controlled action or assessment approach decision at the applicant's request ($6,577)

Request additional information for approval decision (assessment on referral information, preliminary documentation or bilateral/accredited assessment) ($1,701)

Request additional information for approval decision (assessment by environmental impact statement or public environment report) ($7,476)

Variation of conditions ($2,690)

Variation of an action management plan under condi ions of approval ($2,690)

Administrative variation of an action management plan under conditions of approval ($710)

Transfer of approval to new approval holder ($1,967)

Extension to approval expiry date ($2,690)

Australian Government
Department of the Environment and Energy

## EPBC Act Cost Recovery - Fee Schedule

EPBC No: 2017/8134 Date of Fee Schedule: June 26, 2018

Project title: Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland

Assessment method: Preliminary Documentation

**Fee Schedule**

| STAGE FEES | Base fee | PART A Complexity costs (A-L, P) | PART B Complexity costs (MNO) | Total |
|---|---|---|---|---|
| **Stage 1** | $2,074 | $809 | $0 | $2,883 |
| **Stage 2** | $2,289 | $1,280 | $0 | $3,569 |
| **Stage 3** | $852 | $1,348 | $5,491 (Estimate) | $7,691 (Estimate) |
| **Stage 4** | $2,795 | $3,303 | $5,491 (Estimate) | $11,589 (Estimate) |
| **TOTAL PROJECT COST** | $8,010 | $6,742 | $10,982 (Estimate) | $25,734 (Estimate) |

**Notes:**

- For assessments by environmental impact statement - If standard guidelines are used under Section 101A(2)(a) of the EPBC Act, the Stage 1 fee will not be applicable.
- For assessments by public environmental report - If standard guidelines are used under Section 96B of the EPBC Act, the Stage 1 fee will not be applicable.
- If no further information is requested under section 95A of the EPBC Act, the Stage 1 and 2 fees will not be applicable.
- The Department advises applicants of the maximum liability for Part B complexity fees at the time of the assessment approach decision, based on the information provided in the referral documentation. Applicants have the opportunity to reduce the Part B complexity fees during the assessment process by improving the quality of information provided to the Department during Stage 2 of the assessment. These Part B complexity fees are confirmed when all the assessment documentation is provided in Stage 2, and are not payable until Stages 3 and 4 of the assessment.

**Fee Breakdown**

| | | COMPLEXITY | FEE |
|---|---|---|---|
| | **CONTROLLING PROVISIONS** | | |
| **Part A Fees** | A Listed threatened species and ecological communities | Moderate | $6,742 |
| | B Listed migratory species | None | $0 |
| | C Wetlands of international importance | None | $0 |
| | D Environment of the Commonwealth marine area | None | $0 |
| | E World heritage properties | None | $0 |
| | F National heritage places | None | $0 |
| | G Nuclear actions | None | $0 |
| | H Great Barrier Reef Marine Park | None | $0 |
| | I Water Resources | None | $0 |
| | J Commonwealth Land/Commonwealth Agency/Commonwealth Heritage Places Overseas | None | $0 |
| | **NUMBER OF PROJECT COMPONENTS** | | |
| | K Number of project components | Low | $0 |
| | **COORDINATION WITH OTHER LEGISLATION** | | |
| | L Coordination with other legislation | Low | $0 |
| **Part B Fees: estimate (to be confirmed prior to Stage 3)** | **ADEQUACY OF INFORMATION AND CLARITY OF PROJECT SCOPE** | | |
| | M Site surveys/Knowledge of environment | Low | $0 |
| | N Management measures (including mi igation and offsets) | Moderate | $10,982 |
| | O Project scope | Low | $0 |
| **Exceptional circumstances** | **EXCEPTIONAL CIRCUMSTANCES** | | |
| | P Exceptional circumstances | False | $0 |
| **TOTAL COMPLEXITY FEES (Estimate)** | | | $17,724 |
| **BASE FEE** | | | $8,010 |
| **TOTAL FEE (Estimate)** | | | $25,734 |

**Potential fees for contingent and post-approval activities (if required)**

The Department will notify you if a contingent activity fee is applicable due to an additional statutory step being required under the *Environment Protection and Biodiversity Conservation Act 1999*.

**Post-approval fees**

Evaluation of new Action Management Plan (per management plan) ($2,690)

**Contingent Fees**

Request additional information for referral or assessment approach decision ($1,701)

Variation to the proposed action ($1,353)

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Request additional information for approval decision (assessment by environmental impact statement or public environment report) ($7,476)

Variation of conditions ($2,690)

Variation of an action management plan under condi ions of approval ($2,690)

Administrative variation of an action management plan under conditions of approval ($710)

Transfer of approval to new approval holder ($1,967)

Extension to approval expiry date ($2,690)

EPBC Ref: 2017/8134

Kaeko Omura
Managing Director
Polaris Coomera Pty Ltd
PO Box 105
SURFERS PARADISE QLD 4217

Dear Kaeko Omura

**Decision on referral—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland**

Thank you for submitting a referral under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This is to advise you of my decision about the above proposed action.

As a delegate of the Minister for the Environment and Energy, I have decided under section 75 of the EPBC Act that the proposed action is a controlled action and, as such, it requires assessment and a decision about whether approval for it should be given under the EPBC Act.

The information that I have considered indicates that the proposed action is likely to have a significant impact on listed threatened species and communities (section 18 & section 18A). In particular, the proposed action is likely to result in direct and indirect impacts to habitat critical to the survival of the vulnerable Koala. Please note that this decision only relates to the potential for significant impacts on matters protected by the Australian Government under Chapter 2 of the EPBC Act.

I have also decided that the proposed action will need to be assessed by preliminary documentation. Each assessment approach requires different levels of information and involves different steps. All levels of assessment include a public consultation phase, in which any third parties can comment on the proposed action.

Indigenous communities may also need to be consulted during the assessment process. For more information on how and when indigenous engagement should occur during environmental assessments, please refer to the indigenous engagement guidelines at: environment.gov.au/epbc/publications/engage-early.

A copy of the document recording the controlled action decision and the assessment approach decision is attached.

*Cost recovery*

Please note, under subsection 520(4A) of the EPBC Act and the *Environment Protection and Biodiversity Conservation Regulations 2000* your assessment is subject to cost recovery. Please find attached a copy of the fee schedule and an invoice for Stage 1. Fees will be payable prior to each stage of the assessment proceeding. Further details on cost recovery are available at: environment.gov.au/epbc/cost-recovery.

If you disagree with the fee schedule provided, you may apply under section 514Y of the EPBC Act for reconsideration of the method used to work out the fee. The application for reconsideration must be made within 30 business days of the date of this letter and can only be made once for a fee. Further details regarding the reconsideration process can be found at: environment.gov.au/protection/environment-assessments/assessment-and-approval-process/refer-proposed-action.

You may elect under section 132B of the EPBC Act to submit a management plan for approval at any time before the Minister makes an approval decision of the proposed action under section 133 of the EPBC Act. If an election is made under section 132B of the EPBC Act, cost recovery will apply to the approval of any action management plans you submit. Please refer to the attached election form for more details.

Cost recovery does not apply to the approval of action management plans where you do not elect to submit an action management plan for approval under section 132B of the EPBC Act and the approval of the action management plan does not arise from a variation to the approval conditions that you have requested. Where you vary an approval condition and it results in you being required to submit an action management plan for approval, cost recovery will apply to the approval of the action management plan.

*Further information required*

While I have determined that your proposed action will be assessed by preliminary documentation, some further information will be required to be able to assess the relevant impacts of the proposed action. You should expect to receive a letter from the Department within 10 business days of the payment of Stage 1 fees, outlining the information required.

Please also note that once a proposal to take an action has been referred under the EPBC Act, it is an offence under section 74AA to take the action while the decision making process is on-going (unless that action is specifically excluded from the referral or other exemptions apply). Persons convicted of an offence under this provision of the EPBC Act may be liable for a penalty of up to 500 penalty units. The EPBC Act is available on line at: environment.gov.au/epbc/about/index.html.

If you have any questions about the referral process or this decision, please contact the project manager, s22 by email to s22 @environment.gov.au, or telephone 07 s22 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

James Barker
Assistant Secretary
Assessments and Governance Branch

5 / 7 / 2018

EPBC Ref: 2017/8134

s22
Director
Impact Assessment and Operational Support
Department of Environment Science
GPO Box 2454
BRISBANE QLD 4001

Dear s22

**Decision on referral—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland**

I am writing to you in relation to the above proposed action which was referred by Polaris Coomera Pty Ltd for consideration under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

As a delegate of the Minister for the Environment and Energy, I have decided under section 75 of the EPBC Act that the proposed action is a controlled action and, as such, it requires assessment and a decision about whether approval for it should be given under the EPBC Act.

The information that I have considered indicates that the proposed action is likely to have a significant impact on listed threatened species and communities (section 18 & section 18A). Please note that this decision only relates to the potential for significant impacts on matters protected by the Australian Government under Chapter 2 of the EPBC Act.

I have also decided that the proposed action will need to be assessed by preliminary documentation. A copy of the document recording the controlled action decision and the assessment approach decision is attached. This document will also be published on the Department's website.

If you have any questions about the referral process or this decision, please contact the project manager, s22, by email to s22@environment.gov.au, or telephone 07 s22 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

James Barker
Assistant Secretary
Assessments and Governance Branch

5 / 7 / 2018

**From:** s22
**To:** Barker, James
**Cc:** s22
**Subject:** 2017-8134 Referral-decision-briefing package-Coomera Woods [SEC=UNCLASSIFIED]
**Date:** Thursday, 5 July 2018 2:59:06 PM
**Attachments:** 2017-8134 Referral-decision-briefing package.xlsx

---

Hi James

The referral decision package for the Coomera Woods Master Planned Development is attached for your consideration and approval. I have left hard copies of the documents for your signature in your in-tray.

Cheers

s22

Director – Queensland South and Sea Dumping Section
Assessments and Governance Branch
Department of the Environment and Energy

s22

*The Department acknowledges the traditional owners of country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures and to their elders both past and present.*

FOI 180918
Document 4a

**2017/8134 Polaris, Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland**
**Referral decision package**

| Document | Name | Version | Document Description | Record Number | Modified |
|---|---|---|---|---|---|
| **Checklist** | 2017-8134 Referral-decision-QA checklist | 0.02 | Checklist | | 26/06/2018 15:26 |
| Brief | 2017-8134 Referral-decision-brief | 0.43 | Brief-FOR SIGNATURE | 002194781 | 4/07/2018 17 51 |
| Att A | 2017-8134 referral.pdf | 0.02 | Referral | 002118240 | 3/01/2018 14 05 |
| Att A | 2017-8134 Referral-Attach-1 | 0.01 | Referral attachment | 002118257 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-2 | 0.01 | Referral attachment | 002118218 | 4/01/2018 10 00 |
| Att A | 2017-8134 Referral-Attach-3-part a | 0.01 | Referral attachment | 002118249 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-3-part b | 0.01 | Referral attachment | 002118261 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-4 | 0.01 | Referral attachment | 002118266 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-4-figures 1-3 | 0.01 | Referral attachment | 002118263 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-4-figures 4-7 | 0.01 | Referral attachment | 002118222 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-5-part a | 0.01 | Referral attachment | 002118201 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-5-part b | 0.01 | Referral attachment | 002118223 | 22/12/2017 13:49 |
| Att A | 2017-8134 Referral-Attach-6 | 0.01 | Referral attachment | 002118282 | 4/01/2018 10 02 |
| Att A | 2017-8134 Referral-Attach-7-part a | 0.01 | Referral attachment | 002118244 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-7-part b | 0.01 | Referral attachment | 002118246 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-8-part a | 0.01 | Referral attachment | 002118209 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-8-part b | 0.01 | Referral attachment | 002118214 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-9-part a | 0.01 | Referral attachment | 002118233 | 22/12/2017 13:49 |
| Att A | 2017-8134 Referral-Attach-9-part b | 0.01 | Referral attachment | 002118205 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-10-part a | 0.01 | Referral attachment | 002118269 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-10-part b | 0.01 | Referral attachment | 002118284 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-10-part c | 0.01 | Referral attachment | 002118288 | 22/12/2017 13:49 |
| Att A | 2017-8134 Referral-Attach-10-part d | 0.01 | Referral attachment | 002118290 | 22/12/2017 13:49 |
| Att A | 2017-8134 Referral-Attach-10-part e | 0.01 | Referral attachment | 002118273 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-10-part f | 0.01 | Referral attachment | 002118294 | 22/12/2017 13:49 |
| Att A | 2017-8134 Referral-Attach-10-part g | 0.01 | Referral attachment | 002118255 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-10-part h | 0.01 | Referral attachment | 002118276 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-11-part a | 0.01 | Referral attachment | 002118252 | 22/12/2017 13:48 |
| Att A | 2017-8134 Referral-Attach-11-part b | 0.01 | Referral attachment | 002118211 | 22/12/2017 13:48 |
| Att B | 2017-8134 Variation request-decision-package-signed | 0.01 | Additional information to referral | | 21/05/2018 14:16 |
| Att C | 2017-8134 Referral-Polaris letter-confirm not part of larger action | 0.02 | Additional information to referral | 002154954 | 22/01/2018 15:46 |
| Att C | 2017-8134 Referral-additional info-greater glider-6Apr2018 | 0.02 | Additional information to referral | | 6/06/2018 14:40 |
| Att C | 2017-8134 Referral-additional info-koala 7May2018 | 0.02 | Additional information to referral | | 8/05/2018 10:36 |
| Att D | 2017-8134 Referral-koala referral guidelines | 0.01 | Guidelines | | 6/06/2018 14 56 |
| Att E | 2017-8134 Referral-compliance-expert report | 0.01 | Report | | 6/06/2018 15 02 |
| Att F | 2017-8134 Referral-ERT-site plus 1km | 0.04 | ERT | 002124341 | 26/06/2018 13:47 |
| Att G | 2017-8134 Referral-Redacted East Coomera Koala Population Study2017 | 0.02 | Report | 002149505 | 19/01/2018 11:42 |
| Att H | 2017-8134 Referral-Submission-CCG-May2018 | 0.02 | Public Comment | | 29/05/2018 8 56 |
| Att H | 2017-8134 Referral-Submission-CCG-May2018-Att A | 0.02 | Public Comment | | 29/05/2018 8 58 |
| Att H | 2017-8134-Referral-Submission-Gecko Environment Council | 0.01 | Public Comment | 002147275 | 18/01/2018 14:23 |
| Att H | 2017-8134-Referral-Submission-Gecko Environment Council-Att A | 0.01 | Public Comment | 002149347 | 18/01/2018 14:24 |
| Att H | 2017-8134-Referral-Submission-Waterman | 0.01 | Public Comment | 002141136 | 16/01/2018 14:12 |
| Att H | 2017-8134-Referral-Submission-Waterman-CCG-Att A | 0.02 | Public Comment | 002140492 | 16/01/2018 14:13 |
| Att H | 2017-8134-Referral-Submission-Waterman-CCG-Att B | 0.01 | Public Comment | 002141142 | 16/01/2018 14:14 |
| Att H | 2017-8134-Referral-Submission-Lai | 0.01 | Public Comment | 002139468 | 16/01/2018 9 50 |
| Att H | 2017-8134-Referral-Submission-Easterby | 0.01 | Public Comment | 002138845 | 15/01/2018 17:13 |
| Att H | 2017-8134-Referral-Submission-Jean | 0.01 | Public Comment | 002138348 | 15/01/2018 12 55 |
| Att H | 2017-8134-Referral-Submission-Monty | 0.01 | Public Comment | 002138343 | 15/01/2018 12 52 |
| Att H | 2017-8134-Referral-Submission-Shergil | 0.01 | Public Comment | 002134488 | 12/01/2018 9 09 |
| Att H | 2017-8134-Referral-Submission-Winkler | 0.01 | Public Comment | 002138850 | 15/01/2018 17:13 |
| Att H | 2017-8134-Referral-Submission-Winkler-Att A | 0.01 | Public Comment | 002138859 | 15/01/2018 17:14 |
| Att I | 2017-8134 Referral-comment-DEHP | 0.02 | Qld Govt comment | 002146398 | 17/01/2018 17:22 |
| Att J | 2017-8134 Referral-decision-CR-fee schedule-with justifications | 0.02 | Fee schedule | | 26/06/2018 13:26 |
| Att K | 2017-8134 Referral-decision-CR-fee schedule-proponent | 0.02 | Fee schedule | | 26/06/2018 13:27 |
| Att L | 2017-8134 Referral-decision-notice | 0.04 | Decision notice-FOR SIGNATURE | 000883720 | 20/06/2018 16:33 |
| Att M | 2017-8134 Referral-decision-letter-proponent | 0.04 | Letter-FOR SIGNATURE | 001469281 | 20/06/2018 16:24 |
| Att M | 2017-8134 Referral-decision-letter-Qld | 0.03 | Letter-FOR SIGNATURE | 001549805 | 20/06/2018 16:28 |

# Quality Assurance Checklist – Referral Brief

**Reviewing Officer (may be assessment officer, clearing officer or peer reviewer)**

Name: s22 Signature: s22 Date: 26/6/18

**Note:** Assessment officer to fill out sections shaded YELLOW. Reviewing officer to complete all other sections.

| **Project: Polaris, Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland.** | | | | | | |
|---|---|---|---|---|---|---|
| **EPBC No: (2017/8134)** | **Assessment officer: Ben Phillips** | **Due Date: 24 January 2018** | | | | |
| **General requirements** | | **Brief** | | **Decision Notice** | | **Letters** |
| | | (tick or circle) | | | | |
| Correct templates used | | ☑ | | ☑ | | ☑ |
| Template version numbers: (assessment officer to insert version numbers) | | 4.2 | | 4.1 | | 1.2 |
| EPBC reference number correct and used consistently | | ☑ | | ☑ | | ☑ |
| Title of the action consistent | | ☑ | | ☑ | | ☑ |
| The ACN (or ABN if no ACN) is listed and correct | | ☑ | | ☑ | | |
| The designated proponent (CA)/person proposing the action (NCA or NCA-PM) is correct. Needs to be a 'person' for the purposes of the EPBC Act. | | ☑ | | ☑ | | |
| Description of the proposal is an accurate reflection of what is in the referral and encompasses all proposed activities | | ☑ | | ☑ | | ☑ |
| Statutory deadline consistent with database record | | ☑ | | | | |
| Signature blocks and dates are correct | | ☑ | | ☑ | | ☑ |
| List of attachments is correct | | ☑ | | | | |
| All dates mentioned accord with records | | ☑ | | ☑ | | ☑ |
| All species references use SPRAT scientific names (first time that they are used) | | ☑ | N/A | ☐ | N/A | ☐ | N/A |
| Material used to prepare briefing is listed | | ☑ | N/A | | | |
| Public comments are included and issues raised in public comments are addressed (s75(1A)) | | ☑ | N/A | | | |
| Legal advice is included (if advice has been sought) | | ☐ | N/A | | | |
| Line area advice is included (if advice has been sought) | | ☐ | N/A | | | |
| All line areas consulted are clearly identified | | ☐ | N/A | | | |
| Comments from Commonwealth and State/Territory Ministers are included and addressed | | ☑ | N/A | | | |
| Additional information requests (stop clocks) are discussed and briefing package and additional information attached | | ☑ | N/A | | | |
| Current ERT Report included | | ☑ | | Date of ERT Report: 26/6/18 | | |
| Compliance, monitoring and auditing fact sheet is attached (for NCA and NCA-PM) | | N/A ☐ | | | | N/A ☐ |

| | | | | | | |
|---|---|---|---|---|---|---|
| Identifies the protected matters potentially impacted by the proposed action and provides clear reasons why significant impacts are likely/not likely | ☑ | | | | | |
| Recommendations on significance are based on *EPBC Act Policy Statement 1.1 Significant Impact Guidelines – Matters of National Environmental Significance* (2013) and relevant referral guidelines | ☑ | | | | | |
| Considers all adverse impacts the action has, will have or is likely to have on matters protected by each provision of Part 3 ((s.75)(2)(a)) | ☑ | | | | | |
| Does not consider any beneficial impacts the action has, will have or is likely to have on matter protected by each provision of Part 3 ((s.75)(2)(b)) | ☑ | | | | | |
| States that the decision maker must take account of the precautionary principle, and the precautionary principle is discussed as appropriate to recommendations of significance | ☑ | | | | | |
| Bioregional plans are included and discussed (where relevant) | ☐ | N/A | | | | |
| **NEW**: Check listing status of all listed species potentially significantly impacted by the proposed action. Ensure correct listing statuses are used in the brief | ☑ | N/A | Date of check against SPRAT: 6/6/18 | | | |
| **NEW**: WHMD (Species Listing Information & Policy Section) weekly report is consulted to confirm imminent listing events or delistings (if required) | ☑ | N/A | Date of weekly report: 1/6/18 | | | |
| **NEW**: WHMD (Species Listing Information & Policy Section) line area advice included on recent and pending listing decisions during consultation period (if required) | ☐ | N/A | Date of advice received: | | | |
| **NCA-PM decision** | **Brief** | | **Decision Notice** | | **Letters** | |
| Wording of the proposed particular manner(s) clearly describe(s) the way in which the action must be undertaken to avoid significant impacts to protected matters, and accurately reflects the intent in the referral information | | | ☐ | | | |
| Proposed particular manner(s) checked by Post Approvals Section | ☐ | | | | | |
| **CA decision** | **Brief** | | **Decision Notice** | | **Letters** | |
| All controlling provisions have been identified | ☑ | | ☑ | | ☑ | |
| State/territory comments included and addressed where relevant to recommending an appropriate assessment approach (s87(3)(c)) | ☑ | | | | | |
| Has a recommendation on an approach for assessment (s.87) (do not include where bilateral agreement applies, or decision on assessment approach is deferred) | ☑ | N/A | ☑ | N/A | ☑ | N/A |
| Cost recovery fee schedule included | ☑ | N/A | | | ☑ | |

# DEPARTMENT OF THE ENVIRONMENT AND ENERGY

**To:** James Barker, Assistant Secretary, Assessments and Governance Branch, (for decision)

**Referral Decision Brief—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland, (EPBC 2017/8134)**

**Timing:** as soon as practicable, the statutory timeframe of 24 January 2018 has passed.

| | |
|---|---|
| **Recommended Decision** | **NCA** ☐ **NCA(pm)** ☐ **CA** ☒ |
| **Designated Proponent** | Polaris Coomera Pty Ltd<br>ACN: 130 648 056 |
| **Controlling Provisions triggered or matters protected by particular manner** | World Heritage (s12 & s15A) Yes ☐ No ☒ No if PM ☐<br>National Heritage (s15B & s15C) Yes ☐ No ☒ No if PM ☐<br>Ramsar wetland (s16 & s17B) Yes ☐ No ☒ No if PM ☐<br>Threatened Species & Communities (s18 & s18A) Yes ☒ No ☐ No if PM ☐<br>Migratory Species (s20 & s20A) Yes ☐ No ☒ No if PM ☐<br>C'wealth marine (s23 & 24A) Yes ☐ No ☒ No if PM ☐<br>Nuclear actions (s21 & 22A) Yes ☐ No ☒ No if PM ☐<br>C'wealth land (s26 & s27A) Yes ☐ No ☒ No if PM ☐<br>C'wealth actions (s28) Yes ☐ No ☒ No if PM ☐<br>GBRMP (s24B & s24C) Yes ☐ No ☒ No if PM ☐<br>A water resource – large coal mines and CSG (s24D & s24E) Yes ☐ No ☒ No if PM ☐<br>C'wealth heritage o/s (s27B & 27C) Yes ☐ No ☒ No if PM ☐ |
| **Public Comments** | Yes ☒ No ☐ Number: 8 See Attachment H |
| **Ministerial Comments** | Yes ☒ No ☐ Who: See Attachment I |
| **Assessment Approach Decision** | Yes ☒ No ☐ What: Preliminary Documentation<br>Bilateral Applies ☐ |

**Recommendation/s:**

1. Consider the information in this brief, the referral (Attachment A) and other attachments.

**Considered / Please discuss**

2. Agree with the recommended decision.

**Agreed / Not agreed**

3. Agree to the designated proponent.

**Agreed / Not agreed**

4. Agree the action be assessed on preliminary documentation.

**Agreed / Not agreed**

5. If you agree to Recommendation 2 and 4, indicate that you accept the reasoning in the Departmental briefing package as the basis for your decision.

**Accepted / Please discuss**

6. Agree to the fee schedule (with justification) at Attachment J and that the fee schedule (without justification) at Attachment K be sent to the person proposing to take the action.

**Agreed / Not agreed**

7. Note that an invoice will be provided in the letter to the person proposing to take the action for Stage 1 of the assessment, for the preparation of the Preliminary Documentation information required. A separate letter requiring further information will be prepared within 10 business days of payment.

**Noted / Please discuss**

8. Sign the notice at Attachment L (which will be published if you make the recommended decision).

**Signed / Not signed**

9. Sign the letters at Attachment M.

**Signed / Not signed**

Date:

**James Barker, Assistant Secretary, Assessments and Governance Branch:**

**Comments:**

## BACKGROUND:

### Description of the referral

A referral was received on 22 December 2017 (Attachment A). The referral was made by Polaris Coomera Pty Ltd (person proposing to take the action and proponent), which has stated its belief that the proposed action is not a controlled action for the purposes of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

### Description of the proposal (including location)

The proposed action is to develop a residential master planned community in Coomera, approximately 20 km north of the Gold Coast, Queensland. The proposed action includes medium and high density residential uses with integrated open space and conservation areas over approximately 147 ha (the site). The proposed action involves clearing of approximately 137 ha of vegetation, with the remaining 10 ha proposed to be retained.

**Variation to the referral**
On 7 May 2018, the person proposing to take the action submitted a request to vary the proposed action under section 156A of the EPBC Act. The variation proposed to exclude the clearing of approximately 1.5 ha of vegetation (10 m wide, 1.5 km long) along the northern boundary of the site. The variation request was accepted on 21 May 2018 (Attachment B).

As a consequence, the amount of vegetation to be cleared as a result of the proposed action is approximately 135.5 ha. The proposed action still involves development over the approximate 147 ha site as originally proposed.

**Additional information to the referral**
The person proposing to take the action provided additional information to support the information in their referral on 18 January 2018, 12 March 2018, 6 April 2018 and 7 May 2018 (Attachment C). Whilst this information was not provided in response to a formal request made under section 76 or section 89 of the EPBC Act, the Department considers it is appropriate to consider this information in making a decision under section 75 about whether the action is a controlled action and what (if any) provisions of Part 3 are controlling provisions.

**Description of the environment**
The referral states the site is dominated by Eucalypt Woodland / Open Forest including vegetation which is mapped as remnant by the Queensland Government. No significant drainage or riparian zones existing within the site. The site is bordered by existing residential development to the north and east and by the South Coast Railway to the west.

**Related referrals**
Polaris Coomera Pty Ltd has made a number of referrals for developments in the immediate vicinity of the site. These include:

- Coomera Woods Protection Zone, 49 George Alexander Way, Coomera, Queensland, (EPBC 2018/8214). This referral proposes the clearing of approximately 1.5 ha of vegetation (10 m wide, 1.5 km long) along the northern boundary of Lot 44 on SP207822 (being the subject of the variation to referral EPBC 2017/8134). The Department will brief separately on referral EPBC 2018/8214.

- Coomera Woods Master Planned Residential Development, Queensland (EPBC 2015/7610). The referral was for the same proposed development of a residential master planned community on the same footprint that is now the subject of referral EPBC 2017/8134 (being the subject of this brief). The proposal that was the subject of referral EPBC 2015/7610 was determined to be a controlled action for likely significant impacts on listed threatened species and communities, including for impacts to the Koala, on 29 January 2016. That referral was withdrawn on 15 December 2017, prior to the referral for EPBC 2017/8134 being submitted on 22 December 2017.

- Industrial Subdivision, Old Pacific Highway, Coomera, Queensland (EPBC 2013/6819). This proposal lies to the west of the site between the South Coast Railway and the Old Pacific Highway. Following a request for reconsideration (made by Polaris Coomera Pty Ltd) of the original controlled action decision, the proposal was determined to be not a controlled action on 7 March 2014.

The site is in the immediate vicinity of the following previously referred actions:

- The Big Sky Estate Residential Development Stages 5-8, (**2015/7535**), located to the east of the site, involves the clearing of 13.97 ha of Koala habitat and was determined not a controlled action on 18 September 2015.

- The Mixed Use Development, (**2015/7488**), located to the east of the site, involves the clearing of 2.4 ha of Koala habitat and was determined not a controlled action on 24 June 2015.
- The Coomera Northern Frame Residential and Commercial Development Precinct, (**2014/7291**) and adjoining Coomera Town Shopping Centre Development (**2014/7292**), located south east of the site, involve the clearing of 17 ha and 14.4 ha respectively, of Koala habitat, and both were determined not a controlled action on 27 August 2014.
- The Big Sky Estate Residential Development Stages 4, 9 and 10 (**2014/7192**), located to the east of the site, involves the clearing of 18.96 ha of Koala habitat and was determined not a controlled action on 26 May 2014.
- The Coomera Urban Village development - stages 1 and 2, (**2014/7124**), located to the south east of the site, involves the clearing of up to 11.34 ha (including Koala habitat) and was determined not a controlled action on 3 March 2014.
- The 100 Amity Road residential subdivision (**2013/6797**), located to the east of the site, involves the clearing of up to 6.2 ha of Koala habitat and was determined not a controlled action on 30 April 2013.
- The Pimpama Junction Shopping Precinct development (**2013/6772**), located to the north of the site, involves the clearing of up to 3 ha of Koala habitat and was determined not a controlled action on 15 April 2013.
- The Gainsborough Greens residential subdivision (**2013/6751**), located to the north of the proposal, involves the clearing of up to 60 ha of Koala habitat, was determined a controlled action on 12 July 2013, and was approved with conditions on 18 September 2014.
- The 54-64 Karingal Drive residential subdivision (**2013/6739**), located to the north of the site, involves the clearing of up to 5 ha of Koala habitat and was determined not a controlled action on March 5 2013.
- The 70-78 Karingal Drive residential subdivision (**2013/6716**), located to the north of the site, involves the clearing of up to 7 ha of Koala habitat and was determined not a controlled action on March 5 2013.

**KEY ISSUES:**

- In February 2014, the Department's Office of Compliance enquired into the then proposed development of a residential master planned community at the site by Polaris Coomera Pty Ltd.
- Through those enquiries, the Office of Compliance engaged the services of Dr Stephen Phillips, from Biolink Ecological Consultants, as an expert suitably qualified to advise on the presence and quality of Koala habitat at the site, the presence and size of a Koala population at the site, and the consequences of proposed clearing with reference to the Koala referral guidelines[1] (Attachment D). As part of the enquiries, a site inspection was undertaken on 13 June 2015 (Attachment E).
- Whilst the Office of Compliance was not required to form a view on the likelihood of significant impacts as a result of the proposed development (as referral EPBC 2015/7610 was subsequently submitted voluntarily), it was satisfied with the conclusions made by

[1] Department of the Environment (2014). *EPBC Act referral guidelines for the vulnerable koala (combined populations of Queensland, New South Wales and the Australian Capital Territory*. Australian Government, Canberra.

Dr Phillips—that a resident population of koalas occurred on the site, and that the majority (93 per cent) of the site would qualify as high-quality koala habitat (Dr Phillips scored the site 7 using the Koala referral guidelines).

**RECOMMENDED DECISION:**

Under section 75 of the EPBC Act you must decide whether the action that is the subject of the referral is a controlled action, and which provisions of Part 3 (if any) are controlling provisions. In making your decision you must consider all adverse impacts the action has, will have, or is likely to have, on the matter protected by each provision of Part 3. You must not consider any beneficial impacts the action has, will have or is likely to have on the matter protected by each provision of Part 3.

The Department recommends that you decide that the proposed action is a controlled action, because there are likely to be significant impacts on listed threatened species and communities (sections 18 & 18A). The reasons for this recommendation are detailed further below.

**Listed threatened species and communities**

The Department's Environment Reporting Tool (ERT) identifies species and communities may occur within 1 km of the proposed action (see the ERT report at Attachment F). Based on the location of the proposed action and likely habitat present, the Department considers that impacts potentially arise in relation to the following matters.

Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory) (*Phascolarctos cinereus (combined populations of Qld, NSW and the ACT)*— vulnerable

The ERT indicates that the species or its habitat is known to occur within or near the proposed action. The referral considers the entire site (approximately 147 ha) supports Koala food trees and therefore would likely be Koala habitat. Noting the clearing of approximately 1.5 ha of vegetation is excluded from this referral (rather it is the subject of referral EPBC 2018/8214) the proposed action is likely to result in the clearance of approximately 135.5 ha of potential Koala habitat and possible indirect impacts to the remaining 10 ha set aside as open space and conservation areas, through factors such as isolation.

The referral scored the habitat as 4 (using the Koala referral guidelines). Habitat that scores 5 or more in accordance with the referral guidelines is considered to be habitat critical to the survival of the species. The Department disagrees with the score of 4 presented in the referral, and instead considers a score of 7 is more appropriate. In particular,

- Koala occurrence: the referral scored this attribute (+2). The Department agrees.
- Vegetation composition: the referral scored this attribute (+2). The Department agrees.
- Habitat connectivity: the referral scored this attribute (+0). The proponent justified this score on the basis of their assessment that no habitat connectivity values will be retained in the short or long term surrounding the site.

  While the Department accepted this rationale when the proposed action was previously referred (EPBC 2015/7610), the Department now considers a score of (+2) is more appropriate on the basis of new information contained in a 2017 Koala population study commissioned by the City of Gold Coast (Attachment G). This study demonstrates the site is connected to other habitat areas (>500ha) within East Coomera and that the broader area (within which the site is located) supports a viable sub-population. There is also evidence of Koala movement between the broader habitat area and the site. On this basis, the Department considers there is unlikely to be substantial barriers to movement between the

site and the broader East Coomera area. In forming this view, the Department has considered the context and nature of previous projects referred and approved under the EPBC Act in the vicinity of the site.

- Key existing threats: the referral scored this attribute (+0). The Department considers the referral generally presents information about threat sources and Koala mortality in the area and there is limited information available to suggest a different score could be more appropriate.
- Recovery value: the referral scored this attribute (+0). The Department considers a score of (+1) is more appropriate.

  The Koala referral guidelines measure recovery value based on how likely the habitat is to be important for achieving the interim recovery objectives, which in the coastal context are:

  - Protect and conserve large, connected areas of Koala habitat, particularly large, connected areas that support Koalas that are:
    - of sufficient size to be genetically robust / operate as a viable sub-population OR
    - free of disease or have a very low incidence of disease OR
    - breeding.
  - Maintain corridors and connective habitat that allow movement of Koalas between large areas of habitat.

  The Koala population study concluded there is a viable sub-population across the 1,467 ha of available Koala habitat in East Coomera, including the site of the proposed action. At 147 ha, the site makes up approximately 10 per cent of the habitat available to the East Coomera sub-population and therefore may be important to achieving the interim recovery objectives.

  Therefore, the Department considers that, at the very least, there is uncertainty as to whether the site is important for achieving the interim recovery objectives. Therefore it is appropriate to attribute a score of one (+1) for recovery value. Further information about the sites recovery value will be requested during the assessment process.

On the basis of the information above, the Department considers the habitat scores 7 making it habitat critical to the survival of the Koala.

*Other potential impacts*

Additional to the impacts of clearing of 135.5 ha of habitat and isolating the remaining 10 ha, the proposed action may remove or reduce connectivity to other areas of East Coomera and introduce additional threats such as vehicle strike and dog attack. Additional information to quantify these impacts will be sought during the assessment.

*Conclusion*

The Koala referral guidelines indicate a significant impact is likely where 25 ha of habitat scoring 6 or 7 is completely cleared. Noting this and the information above, the Department considers the proposed action is likely to have a significant impact on the Koala.

Greater Glider (*Petauroides volans*)—vulnerable

The ERT indicates the species or its habitat is known to occur within or near the proposed action. The conservation advice[2] says the species is typically found in highest abundance in taller, montane, moist eucalypt forests with relatively old trees and abundant hollows, which it shelters in during the day. The referral does not consider the potential presence of the species and no field surveys specific to the Great Glider were conducted. General fauna and habitat surveys of the site identified individuals of several arboreal mammal species, but no Greater Glider individuals.

On 6 April 2018, the person proposing the action provided additional information about the presence of Greater Glider at the site (Attachment C). This information shows the methodologies and results for arboreal mammal surveys of six nearby and adjacent properties, over a 15 year period from 2003 to 2017. Total area surveyed, including the site itself, is approximately 550 ha in East Coomera. While these surveys did not specifically target the Greater Glider, no Greater Glider individuals were opportunistically observed in any of these surveys.

The Department considers the combined results of the general fauna and habitat surveys of the site, and of the nearby and adjacent properties, provide adequate evidence that the site and surrounding area are not likely to contain an important population or habitat critical to the survival of the species. On this basis, the Department considers a significant impact to the species as a result of the proposed action is unlikely.

*Other listed species and communities*

The ERT identifies the potential presence of additional species and communities within or near the site. Based on information available to the Department, including from the Species Profile and Threats database and the referral, the Department considers that significant impacts to these species and communities are unlikely.

**PROTECTED MATTERS THAT ARE NOT CONTROLLING PROVISIONS:**

**Listed migratory species**

The ERT identifies 17 species that may occur within 1 km of the proposed action (Attachment F). The referral does not include any information about the likely occurrence or nature of potential impacts to migratory species. Given the location of the site and the lack of significant drainage or riparian zones, the Department considers that of the migratory species identified in the ERT, only the migratory terrestrial species described below have the potential to be impacted.

The Oriental Cuckoo (*Cuculus optatus*) and the Black-faced Monarch (*Monarcha melanopsis*) generally prefer rainforest and wetter Eucalypt forest. The White-throated Needletail (*Hirundapus caudacutus*) is almost exclusively aerial and wide ranging across Australia. The Spectacled Monarch (*Monarcha trivirgatus*) mainly occurs in rainforest.

The Satin Flycatcher (*Myiagra cyanoleuca*) is widespread in eastern Australia and mainly inhabits eucalypt forests, often near wetlands or watercourses. The Rufous Fantail (*Rhipidura rufifrons*) mainly inhabits wet sclerophyll forests, often in gullies dominated by eucalypts, usually with a dense shrubby understorey often including ferns.

[2] Threatened Species Scientific Committee (2016). *Approved Conservation Advice for* Petauroides volans (*greater glider*). Commonwealth of Australia, Canberra.

The Department considers the site does not contain the above habitat features, necessary to support the listed migratory species identified in the ERT. On the basis of the information above, the Department considers the proposed action is unlikely to support important habitat for a migratory species, seriously disrupt the lifecycle of a migratory species or result in an invasive species that is harmful to a migratory species being established. Therefore, significant impacts to migratory species are unlikely.

| | |
|---|---|
| **Ramsar Wetlands** | The ERT did not identify any Ramsar listed wetland of international importance within or adjacent to the proposed action, therefore this controlling provision does not apply. |
| **World Heritage properties** | The ERT did not identify any World Heritage properties located within or adjacent to the proposed action, therefore this controlling provision does not apply. |
| **National Heritage places** | The ERT did not identify any National Heritage places located within or adjacent to the proposed action, therefore this controlling provision does not apply. |
| **Commonwealth marine environment** | The proposed action does not occur in the vicinity of a Commonwealth marine environment, therefore this controlling provision does not apply. |
| **Commonwealth action** | The referring party is not a Commonwealth agency, therefore this controlling provision does not apply. |
| **Commonwealth land** | The proposed action is not being undertaken on Commonwealth land, therefore this controlling provision does not apply. |
| **Nuclear action** | The proposed action does not meet the definition of a nuclear action as defined in the EPBC Act, therefore this controlling provision does not apply. |
| **Great Barrier Reef Marine Park** | The proposed action is over 300km from the Great Barrier Reef Marine Park, therefore this controlling provision does not apply. |
| **Commonwealth Heritage places overseas** | The proposed action is not located overseas, therefore this controlling provision does not apply. |
| **A water resource, in relation to coal seam gas development and large coal mining development** | The proposed action is not a coal seam gas or a large coal mining development, therefore this controlling provision does not apply. |

## SUBMISSIONS:

### Public submissions

The referral was published on the Department's website and public comments were invited from 3 January 2018 until 17 January 2018. A total of 8 public submissions were received on the referral (Attachment H). The submissions raised a number of views / issues including about the potential impacts to the Koala, the long-term viability of the broader Koala population, and the presence of a new and independent Koala study for the East Coomera area (the Koala

population study). The Department has considered the public submissions, and addressed relevant matters in this brief.

**Comments from Commonwealth Ministers**
No Commonwealth Ministers were invited to comment on the referral.

**Comments from State/Territory Ministers**
By letter dated 3 January 2018, the Hon Leeanne Enoch MP, Queensland Minister for Environment and the Great Barrier Reef, Minister for Science and Minister for the Arts, was invited to comment on the referral.

On 17 January 2018, a delegate of the Minister responded (Attachment I) stating that the proposed action would not be assessed using the environmental impact statement process in Chapter 3 of the *Environmental Protection Act 1994* (Qld). The response also stated that the Department of State Development, Manufacturing, Infrastructure and Planning had advised that the Coordinator-General had not received a request for declaration of the proposed action as a coordinated project under Part 4 of the *State Development and Public Works Organisation Act 1971* (Qld).

## ASSESSMENT APPROACH:

If you agree that the action is a controlled action, you must decide on the approach for assessment in accordance with section 87 of the EPBC Act. The Department recommends that this proposal be assessed on preliminary documentation under Part 8 of the EPBC Act.

Given the location of matters of national environmental significance, the number of matters likely to be impacted, and the scale and potential impacts of the proposed action, assessment on preliminary documentation represents an appropriate method that will ensure that impacts on the controlling provisions are appropriately assessed.

Under paragraph 87(3)(b) of the EPBC Act, you must consider any other relevant information available about the relevant impacts of the action, including information in a report on the impacts of actions under a policy, plan or program under which the action is to be taken that was given to the Minister under an agreement under Part 10 (about strategic assessments). There are no strategic assessments relevant to the proposed action and the Department is not aware of the any other relevant information for your consideration.

Under subsection 87(5) of the EPBC Act, you may decide on an assessment on preliminary documentation only if you are satisfied that the approach will enable an informed decision to be made about whether or not to approve the taking of the action. In this case, the number and complexity of relevant impacts is low and locally confined. The referral has provided sufficient information regarding the likely sources of impacts and proposed mitigation and management. Assessment on preliminary documentation is therefore considered appropriate for this proposed action.

## OTHER MATTERS FOR DECISION-MAKING:

**Significant impact guidelines**
The Department has reviewed the information in the referral against the *EPBC Act Policy Statement 1.1 Significant Impact Guidelines – Matters of National Environmental Significance* (December 2013) and other relevant material. While this material is not binding or exhaustive, the factors identified are considered adequate for decision-making in the circumstances of this referral.

**Precautionary principle**
In making your decision under section 75, you are required to take account of the precautionary principle (section 391). The precautionary principle is that a lack of full scientific certainty should not be used as a reason for postponing a measure to prevent degradation of the environment where there are threats of serious or irreversible environmental damage.

**Cost Recovery**
The fee schedule (with justifications) for your consideration is at Attachment J. The fee schedule (without justifications) at Attachment K will be sent to the person taking the action, including an invoice for Stage 1, seeking fees prior to the commencement of any further activity.

s22
Director
Queensland South and Sea Dumping Section
Assessments and Governance Branch
T: s22
/ / 2018

Assessment officer: s22
Queensland South and Sea Dumping Section
T: s22

**ATTACHMENTS**

A: Referral documentation

B: Variation to the proposed action

C: Additional information to the referral

D: Koala referral guidelines

E: 2015 Expert report

F: ERT 1 km

G: East Coomera Koala Population Study 2017

H: Public comments

I: Ministerial comments

J: Fee schedule (with justifications)

K: Fee schedule (without justifications)

L: Decision notice—FOR SIGNATURE

M: Letters to Polaris Coomera Pty Ltd and the Queensland Government—FOR SIGNATURE

**Notification of**
**REFERRAL DECISION AND DESIGNATED PROPONENT – controlled action**
**DECISION ON ASSESSMENT APPROACH**

**Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland, (EPBC 2017/8134)**

This decision is made under section 75 and section 87 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

| | |
|---|---|
| **proposed action** | To develop a residential master planned community in Coomera, Queensland [see EPBC Act referral 2017/8134]. |
| **decision on proposed action** | The proposed action is a controlled action.<br><br>The proposed action will require assessment and approval under the EPBC Act before it can proceed. |
| **relevant controlling provisions** | • Listed threatened species and communities (sections 18 & 18A) |
| **designated proponent** | Polaris Coomera Pty Ltd<br><br>ACN: 130 648 056 |
| **assessment approach** | The proposed action will be assessed by preliminary documentation. |

**Decision-maker**

| | |
|---|---|
| **name and position** | James Barker<br>Assistant Secretary<br>Assessments and Governance Branch |
| **signature** | |
| **date of decision** | / / 2018 |

Australian Government
Department of the Environment and Energy

EPBC Ref: 2017/8134

Kaeko Omura
Managing Director
Polaris Coomera Pty Ltd
PO Box 105
SURFERS PARADISE QLD 4217

Dear Kaeko Omura

**Decision on referral—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland**

Thank you for submitting a referral under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This is to advise you of my decision about the above proposed action.

As a delegate of the Minister for the Environment and Energy, I have decided under section 75 of the EPBC Act that the proposed action is a controlled action and, as such, it requires assessment and a decision about whether approval for it should be given under the EPBC Act.

The information that I have considered indicates that the proposed action is likely to have a significant impact on listed threatened species and communities (section 18 & section 18A). In particular, the proposed action is likely to result in direct and indirect impacts to habitat critical to the survival of the vulnerable Koala. Please note that this decision only relates to the potential for significant impacts on matters protected by the Australian Government under Chapter 2 of the EPBC Act.

I have also decided that the proposed action will need to be assessed by preliminary documentation. Each assessment approach requires different levels of information and involves different steps. All levels of assessment include a public consultation phase, in which any third parties can comment on the proposed action.

Indigenous communities may also need to be consulted during the assessment process. For more information on how and when indigenous engagement should occur during environmental assessments, please refer to the indigenous engagement guidelines at: environment.gov.au/epbc/publications/engage-early.

A copy of the document recording the controlled action decision and the assessment approach decision is attached.

*Cost recovery*

Please note, under subsection 520(4A) of the EPBC Act and the *Environment Protection and Biodiversity Conservation Regulations 2000* your assessment is subject to cost recovery. Please find attached a copy of the fee schedule and an invoice for Stage 1. Fees will be payable prior to each stage of the assessment proceeding. Further details on cost recovery are available at: environment.gov.au/epbc/cost-recovery.

If you disagree with the fee schedule provided, you may apply under section 514Y of the EPBC Act for reconsideration of the method used to work out the fee. The application for reconsideration must be made within 30 business days of the date of this letter and can only be made once for a fee. Further details regarding the reconsideration process can be found at: environment.gov.au/protection/environment-assessments/assessment-and-approval-process/refer-proposed-action.

You may elect under section 132B of the EPBC Act to submit a management plan for approval at any time before the Minister makes an approval decision of the proposed action under section 133 of the EPBC Act. If an election is made under section 132B of the EPBC Act, cost recovery will apply to the approval of any action management plans you submit. Please refer to the attached election form for more details.

Cost recovery does not apply to the approval of action management plans where you do not elect to submit an action management plan for approval under section 132B of the EPBC Act and the approval of the action management plan does not arise from a variation to the approval conditions that you have requested. Where you vary an approval condition and it results in you being required to submit an action management plan for approval, cost recovery will apply to the approval of the action management plan.

*Further information required*

While I have determined that your proposed action will be assessed by preliminary documentation, some further information will be required to be able to assess the relevant impacts of the proposed action. You should expect to receive a letter from the Department within 10 business days of the payment of Stage 1 fees, outlining the information required.

Please also note that once a proposal to take an action has been referred under the EPBC Act, it is an offence under section 74AA to take the action while the decision making process is on-going (unless that action is specifically excluded from the referral or other exemptions apply). Persons convicted of an offence under this provision of the EPBC Act may be liable for a penalty of up to 500 penalty units. The EPBC Act is available on line at: environment.gov.au/epbc/about/index.html.

If you have any questions about the referral process or this decision, please contact the project manager, s22 , by email to s22 @environment.gov.au, or telephone s22 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

James Barker
Assistant Secretary
Assessments and Governance Branch

/ / 2018

Australian Government
Department of the Environment and Energy

EPBC Ref: 2017/8134

s22
Director
Impact Assessment and Operational Support
Department of Environment Science
GPO Box 2454
BRISBANE QLD 4001

Dear Mr s22

**Decision on referral—Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland**

I am writing to you in relation to the above proposed action which was referred by Polaris Coomera Pty Ltd for consideration under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

As a delegate of the Minister for the Environment and Energy, I have decided under section 75 of the EPBC Act that the proposed action is a controlled action and, as such, it requires assessment and a decision about whether approval for it should be given under the EPBC Act.

The information that I have considered indicates that the proposed action is likely to have a significant impact on listed threatened species and communities (section 18 & section 18A). Please note that this decision only relates to the potential for significant impacts on matters protected by the Australian Government under Chapter 2 of the EPBC Act.

I have also decided that the proposed action will need to be assessed by preliminary documentation. A copy of the document recording the controlled action decision and the assessment approach decision is attached. This document will also be published on the Department's website.

If you have any questions about the referral process or this decision, please contact the project manager, s22, by email to s22@environment.gov.au, or telephone s22 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

James Barker
Assistant Secretary
Assessments and Governance Branch

/ / 2018

FOI 180918
Document 5

**From:** Barker, James
**To:** s47F s22
**Cc:** Kaeko Omura ; Boyd Sargeant
**Subject:** RE: EPBC 2017/8134 Coomera Woods referral [SEC=UNCLASSIFIED]
**Date:** Thursday, 18 January 2018 5:58:59 PM

---

Thanks s47F .
I understand that s22 asked this question because of inconsistency in the referral documentation as to what was included in the proposal.
We'll continue to assess this proposal, having regard to this and the other information that you have provided.
Regards
James

---

**From:** s47F @polariscoomera.com.au]
**Sent:** Thursday, 18 January 2018 5:40 PM
**To:** Barker, James ; s22
**Cc:** Kaeko Omura ; Boyd Sargeant
**Subject:** FW: EPBC 2017/8134 Coomera Woods referral [SEC=UNCLASSIFIED]
Good afternoon James, s22
Further to the email hereunder and my telephonic discussion with s22 this morning, please see the attached letter from Polaris
Kind Regards

s47F
Polaris Coomera Pty Ltd
Tel: 07 s47F Fax: 07 5526 2574
Mob: s47F
Email: s47F olariscoomera.com.au



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**From:** s22 @environment.gov.au]
**Sent:** Tuesday, January 16, 2018 9:55 AM
**To:** 'boyd@planitconsulting.com.au'
**Cc:** s22 'Kaeko Omura '
**Subject:** EPBC 2017/8134 Coomera Woods referral [SEC=UNCLASSIFIED]
Hi Boyd
Thank you for your time yesterday afternoon where we discussed an area of the Coomera Woods development, in the south-east corner of the site, that was not included in the referred action. Your help in understanding that the area in question is part of the Coomera Woods development, and should have been included in the referral, is appreciated.
I wanted to confirm the way forward from here—am I correct that you will ask Polaris (as the person proposing to take the action) to write to us confirming the area in question is part of the proposed action? Then from there the Department will determine how to

proceed.
As the referral decision is due 24 January 2018, we may need to stop the referral decision clock in order to resolve this matter.
Regards,

s22

Queensland Assessments and Sea Dumping section

Assessments and Governance Branch

Environment Standards Division

Department of the Environment and Energy

GPO Box 787 CANBERRA, ACT 2601
T 07 s22

**From:** s22
**To:** Boyd Sargeant
**Cc:** s47F ; s22 ; Kaeko Omura; s22
**Subject:** Re: EPBC 2017/8134 Coomera Woods referral - MNES
**Date:** Monday, 12 March 2018 1:20:07 PM
**Attachments:** image001.png

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Thank you Boyd. Could you let me know if we can also expect the variation request today?

In relation to bushfire management, the Department has published guidance about fire fighting and prevention activities in relation to national environmental law. s22 could you please forward a copy to s47F and Boyd?

Regards
s22

Sent from my iPhone

On 12 Mar 2018, at 12:28 pm, Boyd Sargeant s47F wrote:

> s22
> Further to our discussion concerning referral 2017/8134 and Matters of National Environmental Significance(MNES), specifically the Greater Glider, please find attached a Supplementary Species Assessment report.
> As advised, detailed ecological assessments and surveying have been conducted on the Coomera Woods Master Plan Development Area over a 15 year period and the Greater Glider has not been recorded. Additionally the specie has not been recorded by Planit in surveying over a similar timeframe of adjoining bushland. This additional area including the Coomera Woods Development site is cumulatively approximately 550ha.
> Given the extent of surveying and timeframe of such, it is considered the species is unlikely to be present on site and unlikely to be affected by the proposed action.
> Should you have any further queries please do not hesitate to contact me on the numbers below and I await your determination on the referral.
> Regards
> Boyd
>
> **Boyd Sargeant**
> Director
>
> **Telephone:** 07 5526 1500 | **Facsimile:** s47F | **Mobile:** s47F
>
> Level 1, 2247 Gold Coast Hwy, Nobby Beach QLD 4218
> PO Box 206, Nobby Beach QLD 4218
>
> **Development Consultants for Queensland - New South Wales - Victoria - Northern Territory**
>
> 

12 March 2018

s22
Assessments and Governance Branch
Department of Environment and Energy
Email: s22 @environment.gov.au

**Supplementary Species Assessment Report – Polaris Coomera Pty Ltd - Coomera Woods Master Planned Development (EPBC 2017/8134)**

Dear s22 ,

As discussed during our conversation, the referral utilised the 2015 Protected Matters Search and did not include an assessment of all potential Matters of National Environmental Significance as at the time of submission.

It is noted that the original proposal included the Protected Matters Searches from 2015 within the Ecological Technical Note by Saunders Havill Group (2017). A recent Protected Matters Search (coordinates; -27.84257, 153.31637, 10km buffer) has identified a number of Matters of National Environmental Significance that may potentially occur within the Coomera Woods site and are discussed below. This discussion is based upon the extensive surveying undertaken on the subject site by Planit Consulting and others over a 15 year period. The comments below are also informed by surveying over a number of adjoining allotments over a similar period. This survey work is noted to have occurred over an approximate 550ha area inclusive of the Coomera Woods site.

**MNES Migratory Species:**
Red Knot (*Calidris canutus*), Curlew Sandpiper (*Calidris ferruginea*), Great Knot (*Calidris tenuirostris*), Greater Sand Plover (*Charadrius leschenaultia*), Lesser Sand Plover (*Charadrius mongolus*), Bar-tailed Godwit (*Limosa Lapponica bauera*), Northern Siberian Bar-tailed Godwit (*Limosa lapponica menzbieri*), Eastern Curlew (*Numenius madagascariensis*) and Fairy Prion (*Pachyptila turtur subantarctica*).

It is noted that these species are migratory wader and marine species have not been recorded during the extensive survey period of the Coomera Woods site. It is considered that potential habitat for these species is absent from the site. The loss of 137.181 ha of modified/disturbed open forest is considered unlikely to significantly impact these species given their preferred habitat requirements. The discussed species occupy large home ranges and are considered to be a mobile taxon and their dispersal ability is unlikely to be affected by this proposal.

**MNES Mammals:**
Greater Glider (*Petauriodes Volans*)

The greater glider is an arboreal nocturnal marsupial, largely restricted to eucalypt forests and woodlands. It is primarily folivorous, with a diet mostly comprising eucalypt leaves, and occasionally flowers (Kehl & Borsboom 1984; Kavanagh & Lambert 1990; van der Ree et al., 2004). It is typically found in highest abundance in taller, montane, moist eucalypt forests with relatively old trees and abundant hollows (Andrews et al., 1994; Smith et al., 1994, 1995; Kavanagh 2000; Eyre 2004; van der Ree et al., 2004; Vanderduys et al., 2012).

During the day it shelters in tree hollows, with a particular selection for large hollows in large, old trees (Henry 1984; Kehl & Borsboom 1984; Lindenmayer et al., 1991; Smith et al., 2007; Goldingay 2012). In Grafton/Casino, Urbenville and the Urunga/Coffs Harbour Forestry Management Areas (FMAs) in northern New South Wales (NSW), the abundance of greater gliders on survey sites was significantly greater on sites with a higher abundance of tree hollows (Andrews et al., 1994; Smith et al., 1994, 1995). In the Grafton/Casino FMA, the greater glider was absent from surveyed sites with fewer than six tree hollows per hectare (Smith et al., 1994). In southern Queensland, greater gliders require at least 2−4 live den trees for every 2 ha of suitable forest habitat (Eyre 2002).

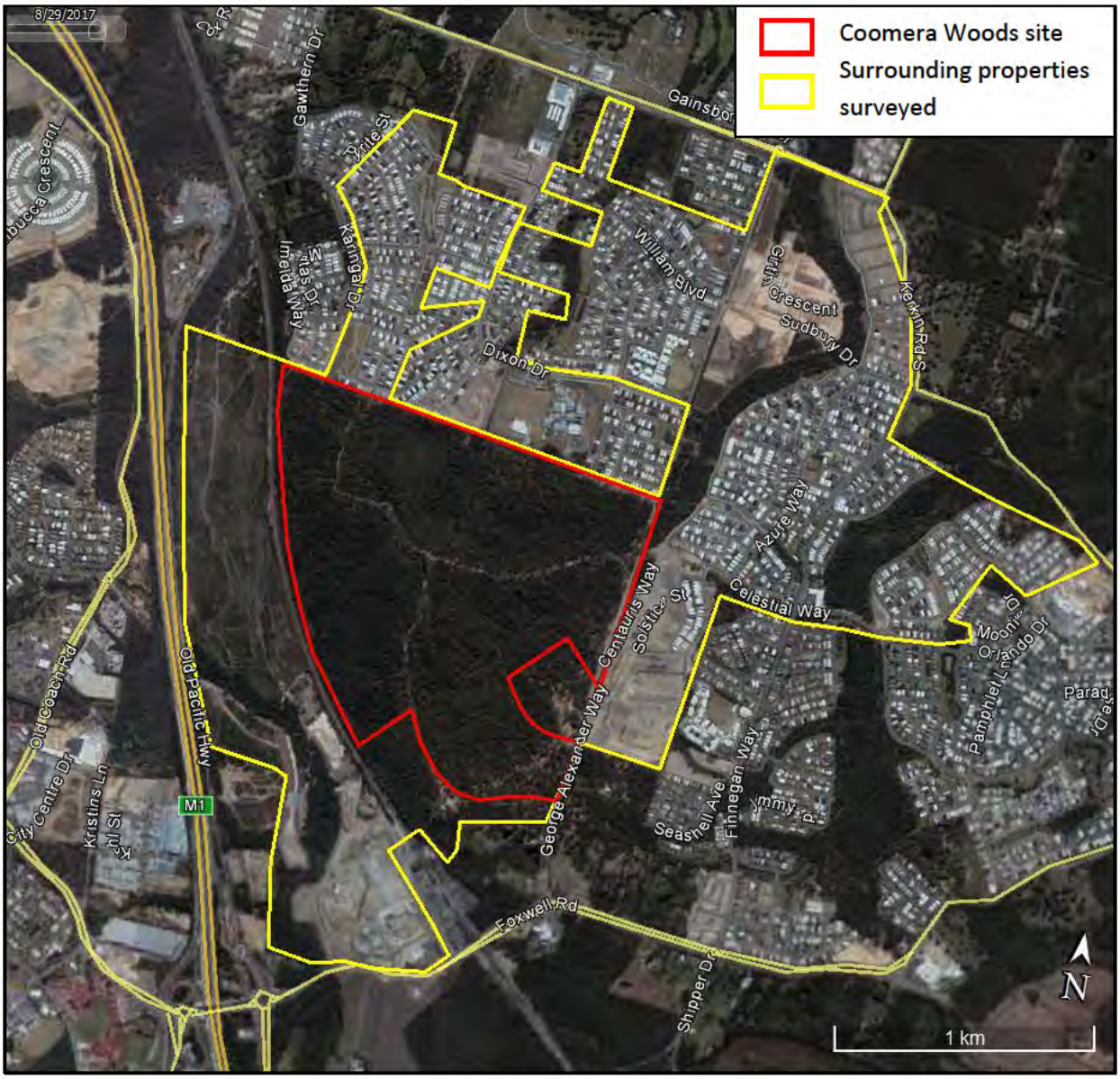
The habitat features and requirements for this species are considered absent from the referral site.

The species has not been recorded on site during various detailed ecological assessments undertaken on site. These surveys conducted by Planit and Saunders Havill Group have been conducted over a 15 year period as outlined below:

- 2003 (Planit Consulting);
- 2008 (Planit Consulting);
- 2015 (Saunders Havill Group);
- 2016 (Saunders Havill Group); and
- 2017 (Planit Consulting).

As discussed, the species was not recorded during the nocturnal surveys during the most recent surveying efforts associated with the most recent EPBC referral.

In addition, Planit Consulting also performed detailed ecological surveys on numerous surrounding properties surrounding which have included surveying for nocturnal and arboreal mammals. The Greater Glider was not identified during any of the detailed surveys of the surrounding sites. The surrounding areas surveyed are shown within the figure below.




Detailed ecological surveys of surrounding properties:

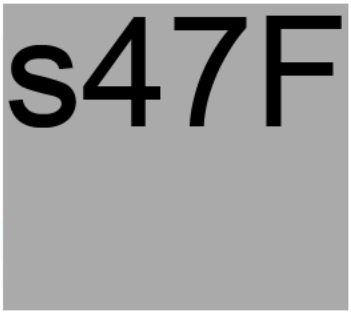
- Bloom Estate (formally Big Sky)
- The Meadows Estate
- Karingal Drive Precinct
- Gainsborough Park Woodlands
- Polaris Industrial Area (Lot 1/SP209027)
- Polaris Residential Estate (Lot 2/SP165374)
- Coomera Town Centre

The total area surveyed including the Coomera Woods site equates to approximately 550ha. This surveying over a significant time period and potential habitat area failed to record the Great Glider. The initial surveys undertaken in the locality were performed prior to any urban development.

Based on this extensive surveying effort it is unlikely the species is present and therefore unlikley that the proposed action is to have a significant impact on the Greater Glider.

Should you have any questions concerning the referral please contact Boyd Sargeant on (07) 5526 1500.

Yours sincerely,




**Boyd Sargeant**
**Director**

**List of Attachments**
*Attachment 1 – Greater Glider Assessment of Significance*

**Assessment of Significance**

Great Glider *(Petauroides volans)*

| Species | EPBC Act Status | Habitat Description | Likelihood of Occurrence and Potential impact |
|---|---|---|---|
| Greater Glider (*Petauroides volans*) | Vulnerable | "The greater glider is an arboreal nocturnal marsupial, largely restricted to eucalypt forests and woodlands. It is primarily folivorous, with a diet mostly comprising eucalypt leaves, and occasionally flowers (Kehl & Borsboom 1984; Kavanagh & Lambert 1990; van der Ree et al., 2004). It is typically found in highest abundance in taller, montane, moist eucalypt forests with relatively old trees and abundant hollows (Andrews et al., 1994; Smith et al., 1994, 1995; Kavanagh 2000; Eyre 2004; van der Ree et al., 2004; Vanderduys et al., 2012). The distribution may be patchy even in suitable habitat (Kavanagh 2000). The greater glider favours forests with a diversity of eucalypt species, due to seasonal variation in its preferred tree species (Kavanagh 1984).<br><br>During the day it shelters in tree hollows, with a particular selection for large hollows in large, old trees (Henry 1984; Kehl & Borsboom 1984; Lindenmayer et al., 1991; Smith et al., 2007; Goldingay 2012). In Grafton/Casino, Urbenville and the Urunga/Coffs Harbour Forestry Management Areas (FMAs) in northern New South Wales (NSW), the abundance of greater gliders on survey sites was significantly greater on sites with a higher abundance of tree hollows (Andrews et al., 1994; Smith et al., 1994, 1995). In the Grafton/Casino FMA, the greater glider was absent from surveyed sites with fewer than six tree hollows per hectare (Smith et al., 1994). In southern Queensland, greater gliders require at least 2–4 live den trees for every 2 ha of suitable forest habitat (Eyre 2002). | This threatened fauna species was not observed within the referral site or adjacent surveyed properties area.<br><br>It is considered that the preferred habitat for this species is largely absent from the proposed works area as a result of limited hollows and anthropogenic disturbances.<br><br>The proposed action is considered unlikely to significantly impact this Matter of National Environmental Significance. |

As discussed above, this species has not been recorded within the referral site during extensive and details ecological surveys over the past 15 years. Much of the surrounding properties have been surveyed by Planit. These surveys have also resulted in no records of the Greater Glider. It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to significantly impact this species.

Based upon the locality, distribution and available habitat it is unlikely that the proposed action will:

- **Lead to a long-term decrease in the size of an important population of each species**

*An 'important population' is a population that is necessary for a species' long-term survival and recovery. This may include populations identified as such in recovery plans, and/or that are:*

1. *key source populations either for breeding or dispersal*
2. *populations that are necessary for maintaining genetic diversity, and/or*
3. *populations that are near the limit of the species range.*

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying. The potential habitat within the referral site is not considered sufficient to maintain a population of this species. It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to lead to a long-term decrease in the size of an important population.

- **Reduce the area of occupancy of an important population**

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying. The potential habitat within the referral site is not considered sufficient to maintain a population of this species. It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to reduce the area of occupancy of an important population.

- **Fragment an existing important population into two or more populations**

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying.

The potential habitat within the referral site is not considered sufficient to maintain a population of this species. The referral site is largely disturbed/modified as a result of historic land uses. The referral site is considered isolated from large intact habitats as a result of adjacent land uses.

It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to fragment an existing important population into two or more populations.

- **Adversely affect habitat critical to the survival of a species**

*Habitat critical to the survival of a species refers to areas that are necessary:*

- *For activities such as foraging, breeding, roosting, or dispersal*
- *For the long-term maintenance of the species (including the maintenance of species essential to the survival of the species)*
- *To maintain genetic diversity and long-term evolutionary development, or*

- *For the reintroduction of populations or recovery of the species.*

Critical habitat may be habitat identified in a recovery plan for the species or listed as Critical Habitat on the Register maintained by the minister under the EPBC Act. The subject site is not listed as habitat critical to the survival of a threatened fauna species within the Critical Habitat Register.

It is considered that the project site does not contain habitat critical to the survival of this species as defined within the NES Guidelines and the species profiles/studies reviewed relevant to the species.

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying.

The potential habitat within the referral site is not considered sufficient to maintain a population of this species. The referral site is largely disturbed/modified as a result of historic land uses. The referral site is considered isolated from large intact habitats as a result of adjacent land uses.

It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to adversely affect habitat critical to the survival of this species.

- **Disrupt the breeding cycle of an important population of each species**

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying.

The potential habitat within the referral site is not considered sufficient to maintain a population of this species. The referral site is largely disturbed/modified as a result of historic land uses. The referral site is considered isolated from large intact habitats as a result of adjacent land uses.

It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to disrupt the breeding cycle of an important population of this species.

- **Modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline**

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying.

The potential habitat within the referral site is not considered sufficient to maintain a population of this species. The referral site is largely disturbed/modified as a result of historic land uses. The referral site is considered isolated from large intact habitats as a result of adjacent land uses.

It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline.

- **Resulting invasive species that are harmful to the vulnerable species becoming established in the vulnerable species' habitat**

Invasive flora species are common within the site (i.e. exotic grasses and herbaceous pasture weeds) and a vegetation management plan has been prepared to reduce propagule spread to retained and offsite habitats.

It is considered unlikely that the proposed action will significantly increase occurrence of invasive species that are harmful to the vulnerable species and becoming established within the species' habitat.

- **Introduce disease that may cause each species to decline**

As far as the intended use of the site as an urban development there is limited possibility of disease introduction. Potential vectors of disease (i.e. introduced fauna species) are considered unlikely to increase via the project and implementation of wash-down procedures for plant and equipment to minimize the chance of transporting weed propagules into the site is recommended within the rehabilitation plan. Protocols should also be developed to ensure such plant disease are not introduced into new locations where they may impact upon the retained habitat.

The construction and operation of the proposed action is unlikely to introduce disease that may cause either of the discussed species to decline.

- **Interfere substantially with the recovery of each species**

The subject site is not currently occupied by an important population. This species has not been recorded within the referral site or surrounding properties over an extensive period of surveying.

The potential habitat within the referral site is not considered sufficient to maintain a population of this species. The referral site is largely disturbed/modified as a result of historic land uses. The referral site is considered isolated from large intact habitats as a result of adjacent land uses.

It is therefore considered that this species does not occur within the referral site and the proposed action is unlikely to modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline.

**Conclusion**

The proposed action is unlikely to result in a significant effect on this species as:

- This species has not been recorded within the referral site during an extensive 15 year period of detailed ecological studies.
- This species was not recorded in adjacent properties during detailed ecological surveys.
- The referral site is not considered to be occupied by an important population of this species.
- The habitat is not considered critical to the survival of this species and lacks large hollows to maintain a population of this species.

FOI 180918
Document 7

**From:** s22
**To:** s47F
**Cc:** s22 "Kaeko Omura "
**Subject:** RE: EPBC 2017/8134 Coomera Woods Master Planned Development [SEC=UNCLASSIFIED]
**Date:** Monday, 19 March 2018 6:20:47 PM

Dear s47F

As requested, the Department will postpone making a recommendation on the Coomera Woods referral until we have received and considered the new information indicated in your email below. However, as previously advised, the Department would like to progress the variation request as soon as possible. Could you please let me know when you are available to hold the meeting requested by s47F last week?

Kind regards

s22

Director – Queensland South and Sea Dumping Section
Assessments and Governance Branch
Department of the Environment and Energy

s22

*The Department acknowledges the traditional owners of country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures and to their elders both past and present.*

**From:** s47F
**Sent:** Monday, 19 March 2018 4:05 PM
**To** s22
**Cc** 'Kaeko Omura '
**Subject:** RE: EPBC 2017/8134 Coomera Woods Master Planned Development [DLM=For-Official-Use-Only]

Dear s22,

Thank you for your email.

We would like the opportunity to provide the Department with more information in relation to the issues that have been raised. We anticipate being in a position to provide the information by 6 April 2018.

In the circumstances, we ask that the Department postpone making a recommendation on the referral until such time as we have provided the information, and the Department has had an opportunity to fully consider the information.

Please confirm that this is acceptable.

Kind Regards

s47F

**From:** s22 @environment.gov.au]
**Sent:** Friday, 16 March 2018 4:27 PM
**To:** s47F
**Cc:** s22 @environment.gov.au>; s22
s22 >; Kaeko Omura <kaeko@polariscoomera.com.au>
**Subject:** EPBC 2017/8134 Coomera Woods Master Planned Development [DLM=For-Official-Use-Only]

Dear s47F

In your recent email, you requested an update on the status of the referral decision for the proposed Coomera Woods Master Planned Development. I was intending to discuss this with you in this afternoon's meeting but as this was postponed, this email provides you with the requested update. In summary, the Department is intending to make a recommendation on the referral next week, based on the following information and conclusions.

Koala Habitat:

After considering the information in the referral and other relevant information, the Department is of the view that the site contains habitat critical to the survival of the koala. The Department's scoring of the koala habitat against the *EPBC Act referral guidelines for the vulnerable koala* is detailed in the following table. Where the Department's score differs from that of Polaris, an explanation of the rationale for the Department's determination is provided for your information.

| Attribute | Polaris' score | Dept score | Comment |
|---|---|---|---|
| Koala occurrence | 2 | 2 | SAME AS 2015 REFERRAL DECISION |
| Vegetation composition | 2 | 2 | SAME AS 2015 REFERRAL DECISION |
| Habitat connectivity | 0 | 1 | NEW INFORMATION<br>The information provided in the referral contains results from a 2016 survey (Saunders Havill Group), showing koalas safely using an ecological corridor connected to the north-east corner of the site, and continuing to the north where there are large patches of habitat. The referral provides evidence of at least one koala moving in and out of the site, using the corridor over a five day period in June 2016. The referral also cites a 2014 Council report (City of Gold Coast, 2014, *Koala Conservation Plan for East Coomera, Planning and Environment Directorate, July 2014 to June 2018*, version 5 – September 2014.) with the results of radio tracking surveys showing the home ranges of several koalas being within this corridor. Further, in 2017 (prior to referral of the proposed action) the *East Coomera Koala Population Study 2017* (Biolink Ecological Consultants, 2017, *East Coomera Koala Population Study 2017*, prepared for City of Gold Coast, November 2017) was made publicly available by the Council. This study records koalas using this corridor as recently as 2017.<br>The Department is of the view that this evidence demonstrates koalas use this corridor to access the site and areas to the south, and that the corridor is of significance in maintaining connectivity between the site and surrounding koala habitat. Further, the Department cannot foresee a reason as to why koalas will not continue to use this corridor and also do not see any reason as to why the corridor will |

| | | | |
|---|---|---|---|
| | | | not be maintained over time. The Department is of the view that the corridor is suitable as an ecological corridor for koalas and in combination with the broader context of the area, plays a role in maintaining connectivity. Therefore, based on this more recent survey data, the Department considers that the habitat connectivity score for the site should be +1, as this site is considered contiguous with an area greater than 300 ha but less than 500 ha. |
| Key existing threats | 0 | 0 | NEW INFORMATION<br><br>The referral states:<br>"The development of the surrounding sites has been ongoing for many years with no koala recorded mortalities by vehicle or domestic animals within the development vicinity. This is confirmed within the Koala Conservation Plan for East Coomera. All vehicle strikes were recorded along the Pacific Motorway and roads south of the impact area."<br><br>The conservation plan referred to is the same 2014 Council report mentioned above. The information in the referral and report highlight that there is no evidence of koala mortality at or in the vicinity of the referral site, which is the metric used in the koala referral guidelines. There is limited reason to adjust the scoring accepted on the previous referral as the information presented does not suggest that threats and mortality has significantly reduced |
| Recovery value | 0 | 1 | NEW INFORMATION<br><br>The koala referral guidelines measure recovery value based on how likely the habitat is to be important for achieving the interim recovery objectives, which in this context, are to protect and conserve large, connected areas of koala habitat, particularly large, connected areas that support koalas that are:<br><br>• of sufficient size to be genetically robust/ operate as a viable sub-population OR<br><br>• free of disease or have a very low incidence of disease OR<br><br>• breeding<br><br>And to maintain corridors and connective habitat that allow movement of koalas between large areas of habitat.<br><br>Large and connected: The contextually large size of the referral site and its increased connectivity meet the recovery objectives.<br><br>Viable sub-population: While the Department does not consider the referral site itself is of sufficient size to be genetically robust or operate as a viable sub-population, the site may contribute to supporting a viable sub-population within the east Coomera area. The *East Coomera Koala Population Study 2017* indicates the east Coomera area contains a viable sub-population of koalas.<br><br>Breeding: According to the *East Coomera Koala Population Study 2017*, the east Coomera koala sub-population has remained relatively stable, with a population estimate of approximately 500 individuals in both 2006-07 and 2017. This sub-population has remained stable despite the removal of 180 koalas. The Department considers the maintenance of a stable sub-population over this period, when 180 koalas have been removed, indicates breeding is occurring in the sub-population.<br><br>Maintain connectivity: The site is part of a large connected area of koala habitat (refer to habitat connectivity discussion above).<br><br>The recovery value of the site is further supported by the |

| | | | |
|---|---|---|---|
| | | | *City of Gold Coast, 2017,* DRAFT Koala Conservation Plan*, Planning & Environment Directorate*, which outlines that the area previously supported a large population of koalas. The report also states that the remaining high population of koalas are likely being condensed into available patches of remnant habitat. This information suggests that remnant areas of habitat in the area play some role in maintaining the area's population.<br><br>The Department considers the referral site is part of a large, connected area of koala habitat, that supports a viable sub-population, breeding, and maintains corridors and connective habitat that allow movement of koalas between large areas of habitat. Therefore, the Department is of the view that a recovery value score of +1 is appropriate. |
| **TOTAL** | **4** | **6** | |

Impacts on the greater glider:

The Department has also reviewed the information provided by Planit Consulting on 12 March 2018, in relation to habitat for the greater glider. The Department considers that the information provided does not provide sufficient detail or evidence to rule out the presence of the species or conclude that the site does not contain the habitat features and requirements for the greater glider. Provision of the following information would provide greater confidence in the conclusions made in Planit's assessment.

Field surveys

- How many surveys were done
- When was each survey done (time of day, day, month, year)
- What was the purpose of each survey – general surveys, opportunistic surveys, and surveys for other species are considered to have a lower reliability than surveys for the specific species of interest
- The mapped location of the survey, including the survey site and where any specific survey activities were undertaken, i.e. transects
- Weather conditions when each survey was done
- Details of the methodology used to survey
- Each person performing the survey's experience with the chosen methodology and identifying the species that is the subject of the survey
- How survey sites, plots, transects etc were selected to provide a high level of confidence in the results
- The survey effort employed, including an explanation of how this level of survey effort was selected to provide a high level of confidence
- Any limitations of the survey, including limitations of the methodology, survey effort, experience, survey coverage etc.

Results

- Results for each survey, including any statistical analysis, especially analysis on the confidence of any findings
- Mapped results for each survey
- Discussion of the results.

Please do not hesitate to contact me if you require any further clarification on the contents of this email.

Kind regards,

s22

Director – Queensland South and Sea Dumping Section

Assessments and Governance Branch

Department of the Environment and Energy

s22

*The Department acknowledges the traditional owners of country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures and to their elders both past and present.*

FOI 180918
Document 8

**From:** s47F
**To:** s22
**Cc:** s22 "Kaeko Omura ";s22 Boyd Sargeant
**Subject:** RE: EPBC 2017/8134 Coomera Woods Master Planned Development [ME-ME.FID3771060] [SEC=UNCLASSIFIED]
**Date:** Monday, 7 May 2018 3:47:19 PM

---

Dear s22
Further to the emails hereunder, we herewith submit the following two documents by web link:

1) **Request to Vary an Action (Section 156A) – Polaris Coomera Pty Ltd - Coomera Woods Master Planned Development (EPBC 2017/8134)**
https://www.dropbox.com/s/utu1pfatanfyosx/2018-05-04%20Variation%20to%20Referred%20Action_combined.pdf?dl=0
2) **New Information relating to the ecological corridor and Koala Habitat Assessment Score – Polaris Coomera Pty Ltd - Coomera Woods Master Planned Development (EPBC 2017/8134).**
https://www.dropbox.com/s/ajiz4zxc85j75vp/New%20Information_%20Ecological%20Corridor%20%26%20Koala%20Assessment%20Score%20%282018-05-07%29.pdf?dl=0

It is our understanding that the Department will generate an invoice for the fee payable under the EPBC Regulations for the variation request. We will make the payment as soon as we receive the invoice
The variation request relate to the exclusion (from the current referral) the clearing of a strip along the northern boundary of the Coomera Woods site (the **excluded clearing**). We plan to undertake the excluded clearing as a separate action and will refer this proposed separate action to the Department. We are in the process of finalising this referral and intend to make this referral no later than 14 May 2018
Kind Regards

s47F



---

**From:** s22 @environment.gov.au]
**Sent:** Friday, 13 April 2018 1:57 PM
**To:** s47F '
**Cc:** s22 ; Kaeko Omura ;s22
**Subject:** RE: EPBC 2017/8134 Coomera Woods Master Planned Development [ME-ME.FID3771060] [SEC=UNCLASSIFIED]

Dear s47F
Thank you for your email. Below is a response to your points.
1. Thank you for the information on the Greater Glider.
2. The Department has advised of options available consistent with the requirements of the EPBC Act. We will await advice from you about how you wish to proceed.
3.a. The Department used the publicly available, redacted, copy of the report.
3.b. In making the referral decision, the Department will consider all relevant information received by COB 7 May 2018.
Regards

s22
A/g Director
Queensland South and Sea Dumping Section
Assessments and Governance Branch
Department of the Environment and Energy
s22

---

**From:** s47F
**Sent:** Friday, 6 April 2018 3:56 PM
**To:** s22 @environment.gov.au>
**Cc:** s22
s22 Kaeko Omura <kaeko@polariscoomera.com.au>
**Subject:** RE: EPBC 2017/8134 Coomera Woods Master Planned Development [ME-ME.FID3771060] [SEC=UNCLASSIFIED]

Dear s22
Thank you for your previous emails below.

1. In relation to the Department's comments regarding the greater glider, please find **attached** a Supplementary Species Assessment Report from Planit Consulting. The supplementary report addresses the Department's comments as outlined in your email of 16 March 2018.
2. In relation to the management of the bushfire risk and the risks associated with the trees on the northern boundary that are either overhanging or leaning close to the boundary, we are forming the opinion that we may need to refer the proposed clearing of the vegetation associated with these risks. Additionally we may need to amend the Coomera Woods Master Planned Development referral to accommodate a further referral for the bushfire and safety matters. We are meeting with our consultants to further discuss and progress these matters.
3. In relation to the Department's comments regarding the koala habitat in your email dated 16 March 2018:
    a. the Department has made several references to the *East Coomera Koala Population Study 2017*, prepared for Gold Coast City Council, and stated that the report is made available online. At present, the version available online is heavily redacted, and the full version is not available from Council, because it was discussed during a closed session of the City Planning Committee. As we have not been able to access and review the contents of the report, we are not in a position to provide a response to the Department in relation to its comments regarding the koala habitat;
    b. new information has come to our attention in relation to the corridor to the north-east of the referral site that will need to be addressed in the referral. The comments made by the Department in relation to the koala habitat are inconsistent with this new information, and will therefore need to be addressed so that the Department can make a well informed decision on the referral;

In relation to point 3a above, are you able to provide us with this report so that we, and our consultants, may appropriately consider its contents, in light of the Department's comments, and provide the Department with a fulsome response?
As previously stated in my email of 19 March, we ask that the Department postpone making a recommendation on the referral until all of the relevant information has been provided, and the Department has had an opportunity to fully consider the information.
We request a further month, to **7 May 2018**, to provide our response in relation to the above.
Please confirm that this is acceptable
Kind regards
s47F

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**From:** s22 @environment.gov.au]
**Sent:** Thursday, 29 March 2018 1:37 PM
**To:** s47F
**Cc:** s22 Kaeko Omura <kaeko@polariscoomera com.au>; 'Will Sharpe' <Will Sharpe@minterellison.com>; s22
**Subject:** RE: EPBC 2017/8134 Coomera Woods Master Planned Development [ME-ME.FID3771060] [SEC=UNCLASSIFIED]

Dear s47F

Thank you for your email. The Department remains of the view that it is open to Polaris Coomera to pursue the option to vary the Coomera Woods proposal consistently with the requirements of the EPBC Act, as advised in my email dated 6 March 2018 (attached).

Further to our conversation last week about prior authorisation and continuing use provisions, you may find the attached guidance of useful reference.

With regards to the Coomera Woods referral, we await receipt of your further information on 6 April.

Kind regards

s22

Director – Queensland South and Sea Dumping Section
Assessments and Governance Branch
Department of the Environment and Energy

s22

*The Department acknowledges the traditional owners of country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures and to their elders both past and present.*

**From:** s47F
**Sent:** Wednesday, 28 March 2018 4:02 PM
**To:** s22
**Cc:** s22 Kaeko Omura <kaeko@polariscoomera com.au>; 'Will Sharpe' <Will Sharpe@minterellison.com>
**Subject:** RE: EPBC 2017/8134 Coomera Woods Master Planned Development [ME-ME.FID3771060] [SEC=UNCLASSIFIED]

Dear s22

Thank you for your time on the phone on Friday and for your email below.

As discussed during the phone conference, Polaris Coomera is concerned to ensure that it complies with the requirements of the EPBC Act.

The action that has been referred for assessment—the development of Coomera Woods housing estate—includes activities to clear most of the trees on the site. The referred action applies to the whole of the site (save for an ecological corridor to the northeast).

The Department has proposed that the removal of trees on the northern boundary that are either overhanging or leaning close to the boundary may be allowed if the referred action were varied. On Friday we also discussed the possibility that the trees to be removed may involve a strip along the northern boundary of between six to ten metres.

Polaris Coomera is concerned to ensure that the proposed of allowing for the removal of the trees is consistent with the EPBC Act.

We understand that the proposal is made on the basis that if the locations of the trees are removed from the referral, the removal of the trees in those locations would no longer be part of the referral and therefore would not be subject to the offence provision at s.74AA of the EPBC Act. However, once those locations are removed from the referral, it would be necessary for Polaris Coomera to undertake its own assessment of whether the removal of the trees would have a significant impact. If Polaris Coomera considers that the removal of the trees will not have a significant impact, they may proceed with the removal on their own understanding that they will not be in breach of provisions under Part 3 of the Act. You have suggested that if the Department consents to the variation in the knowledge that the consent would be intended to allow for the removal of the trees, it is unlikely that the Department would then take action against Polaris Coomera for removing the trees.

Polaris Coomera requests clarification on the following in order to understand whether to proceed as proposed, and if so, to understand how the proposed variation should be framed:

- Noting that the EPBC Act regulates an 'action', is it possible to vary a proposed action under s.156A by removing a portion of the land on which the action is to be undertaken from the proposal, or does s.156A instead provide for a variation of the activities or the things intended to be done with respect to the proposed action?
- Where Polaris Coomera intends to proceed with the action originally referred—i.e. an action for the development of Coomera Woods estate—and that action is intended to be undertaken on the whole of the site, will any decisions under ss.75 and 130 apply to the whole of the action or will those decisions not apply with respect to any part of the action undertaken on a portion of land removed from the proposal?
- Will the removal of trees from an area of land that is removed from the proposed action nevertheless continue to be an offence under s.74AA where the removal of trees from that area and the development of that land remains a component of the proposed action (noting in particular s.74AA(1)(b)(i))?

We look forward to your early response in order to allow Polaris Coomera to make an informed decision as to how it should proceed.

Kind Regards

s47F

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**From:** s22 @environment.gov.au]
**Sent:** Monday 26 March 2018 08:10 am

**To:** s47F
**Cc:** s22 ; 'Kaeko Omura '
<kaeko@polariscoomera com.au>; Will Sharpe <Will Sharpe@minterellison.com>
**Subject:** RE: EPBC 2017/8134 Coomera Woods Master Planned Development [ME-ME.FID3771060] [SEC=UNCLASSIFIED]

Dear s47F

Just following up to confirm the agreed actions from our meeting on Friday - Polaris Coomera will:

1. Email your questions about the operation of the EPBC Act in relation to the variation request and continuing use provisions to the Department
2. Provide the Department with a map and any photos you have from Planit's site inspection that show the location and condition of the unsafe trees. As discussed, these may be provided later and separately to questions about the operation of the EPBC Act if necessary.

The Department requests that you provide this information as soon as possible to ensure this matter can be resolved expeditiously.

Kind regards

s22
Director – Queensland South and Sea Dumping Section
Assessments and Governance Branch
Department of the Environment and Energy
s22

*The Department acknowledges the traditional owners of country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures and to their elders both past and present.*

**From:** s22 @environment.gov.au]
**Sent:** Friday, 16 March 2018 4:27 PM
**To:** s47F
**Cc:** s22 Kaeko Omura
<kaeko@polariscoomera com.au>
**Subject:** EPBC 2017/8134 Coomera Woods Master Planned Development [DLM=For-Official-Use-Only]

Dear s47F

In your recent email, you requested an update on the status of the referral decision for the proposed Coomera Woods Master Planned Development. I was intending to discuss this with you in this afternoon's meeting but as this was postponed, this email provides you with the requested update. In summary, the Department is intending to make a recommendation on the referral next week, based on the following information and conclusions.

Koala Habitat:

After considering the information in the referral and other relevant information, the Department is of the view that the site contains habitat critical to the survival of the koala. The Department's scoring of the koala habitat against the *EPBC Act referral guidelines for the vulnerable koala* is detailed in the following table. Where the Department's score differs from that of Polaris, an explanation of the rationale for the Department's determination is provided for your information.

| Attribute | Polaris' score | Dept score | Comment |
|---|---|---|---|
| Koala occurrence | 2 | 2 | SAME AS 2015 REFERRAL DECISION |
| Vegetation composition | 2 | 2 | SAME AS 2015 REFERRAL DECISION |
| Habitat connectivity | 0 | 1 | NEW INFORMATION<br>The information provided in the referral contains results from a 2016 survey (Saunders Havill Group), showing koalas safely using an ecological corridor connected to the north-east corner of the site, and continuing to the north where there are large patches of habitat The referral provides evidence of at least one koala moving in and out of the site, using the corridor over a five day period in June 2016 The referral also cites a 2014 Council report (City of Gold Coast, 2014, *Koala Conservation Plan for East Coomera, Planning and Environment Directorate, July 2014 to June 2018*, version 5 – September 2014 ) with the results of radio tracking surveys showing the home ranges of several koalas being within this corridor Further, in 2017 (prior to referral of the proposed action) the *East Coomera Koala Population Study 2017* (Biolink Ecological Consultants, 2017, *East Coomera Koala Population Study 2017*, prepared for City of Gold Coast, November 2017) was made publicly available by the Council This study records koalas using this corridor as recently as 2017<br>The Department is of the view that this evidence demonstrates koalas use this corridor to access the site and areas to the south, and that the corridor is of significance in maintaining connectivity between the site and surrounding koala habitat Further, the Department cannot foresee a reason as to why koalas will not continue to use this corridor and also do not see any reason as to why the corridor will not be maintained over time The Department is of the view that the corridor is suitable as an ecological corridor for koalas and in combination with the broader context of the area, plays a role in maintaining connectivity Therefore, based on this more recent survey data, the Department considers that the habitat connectivity score for the site should be +1, as this site is considered contiguous with an area greater than 300 ha but less than 500 ha |
| Key existing threats | 0 | 0 | NEW INFORMATION<br>The referral states:<br>"The development of the surrounding sites has been ongoing for many years with no koala recorded mortalities by vehicle or domestic animals within the development vicinity This is confirmed within the Koala Conservation Plan for East Coomera All vehicle strikes were recorded along the Pacific Motorway and roads south of the impact area "<br>The conservation plan referred to is the same 2014 Council report mentioned above The information in the referral and report highlight that there is no evidence of koala mortality at or in the vicinity of the referral site, which is the metric used in the koala referral guidelines There is limited reason to adjust the scoring accepted on the previous referral as the information presented does not suggest that threats and mortality has significantly reduced |
| Recovery value | 0 | 1 | NEW INFORMATION<br>The koala referral guidelines measure recovery value based on how likely the habitat is to be important for achieving the interim recovery objectives, which in this context, are to protect and conserve large, connected areas of koala habitat, particularly large, connected areas that support koalas that are:<br>• of sufficient size to be genetically robust/ operate as a viable sub-population OR<br>• free of disease or have a very low incidence of disease OR<br>• breeding<br>And to maintain corridors and connective habitat that allow movement of koalas between large areas of habitat<br>Large and connected: The contextually large size of the referral site and its increased connectivity meet the recovery objectives<br>Viable sub-population: While the Department does not consider the referral site itself is of sufficient size to be genetically robust or operate as a viable sub-population, the site may contribute to supporting a viable sub-population within the east Coomera area The *East Coomera Koala Population Study 2017* indicates the east Coomera area contains a viable sub-population of koalas<br>Breeding: According to the *East Coomera Koala Population Study 2017*, the east Coomera koala sub-population has remained relatively stable, with a population estimate of approximately 500 individuals in both 2006-07 and 2017 This sub-population has remained stable despite the removal of 180 koalas The Department considers the maintenance of a stable sub-population over this period, when 180 koalas have been removed, indicates breeding is occurring in the sub-population<br>Maintain connectivity: The site is part of a large connected area of koala habitat (refer to habitat connectivity discussion above)<br>The recovery value of the site is further supported by the *City of Gold Coast, 2017,* DRAFT Koala Conservation Plan, *Planning & Environment Directorate*, which outlines that the area previously supported a large population of koalas The report also states that the remaining high population of koalas are likely being condensed into available patches of remnant habitat This information suggests that |

| | | | |
|---|---|---|---|
| | | | remnant areas of habitat in the area play some role in maintaining the area s population<br><br>The Department considers the referral site is part of a large, connected area of koala habitat, that supports a viable sub-population, breeding, and maintains corridors and connective habitat that allow movement of koalas between large areas of habitat Therefore, the Department is of the view that a recovery value score of +1 is appropriate |
| **TOTAL** | **4** | **6** | |

Impacts on the greater glider:

The Department has also reviewed the information provided by Planit Consulting on 12 March 2018, in relation to habitat for the greater glider. The Department considers that the information provided does not provide sufficient detail or evidence to rule out the presence of the species or conclude that the site does not contain the habitat features and requirements for the greater glider. Provision of the following information would provide greater confidence in the conclusions made in Planit's assessment.

Field surveys

- How many surveys were done
- When was each survey done (time of day, day, month, year)
- What was the purpose of each survey – general surveys, opportunistic surveys, and surveys for other species are considered to have a lower reliability than surveys for the specific species of interest
- The mapped location of the survey, including the survey site and where any specific survey activities were undertaken, i e. transects
- Weather conditions when each survey was done
- Details of the methodology used to survey
- Each person performing the survey's experience with the chosen methodology and identifying the species that is the subject of the survey
- How survey sites, plots, transects etc were selected to provide a high level of confidence in the results
- The survey effort employed, including an explanation of how this level of survey effort was selected to provide a high level of confidence
- Any limitations of the survey, including limitations of the methodology, survey effort, experience, survey coverage etc.

Results

- Results for each survey, including any statistical analysis, especially analysis on the confidence of any findings
- Mapped results for each survey
- Discussion of the results.

Please do not hesitate to contact me if you require any further clarification on the contents of this email.

Kind regards,

s22

Director – Queensland South and Sea Dumping Section
Assessments and Governance Branch
Department of the Environment and Energy

s22

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FOI 180918
Document 9

**From:** Barker, James
**To:** "Kaeko Omura"
**Cc:** s22 ; 's47F
**Subject:** RE: 2017/8134 Coomera Woods Master Planned Development, Coomera, Queensland - referral decision - Request for Statement of Reason [SEC=UNCLASSIFIED]
**Date:** Tuesday, 17 July 2018 2:19:11 PM

Thanks Kaeko. We'll aim to provide you with the statement of reasons within the 28 day timeframe provided by the ADJR Act. Regards, James.

**From:** Kaeko Omura [mailto:kaeko@polariscoomera.com.au]
**Sent:** Tuesday, 17 July 2018 12:31 PM
**To:** Barker, James
**Cc:** s22 ; s47F '
**Subject:** RE: 2017/8134 Coomera Woods Master Planned Development, Coomera, Queensland - referral decision - Request for Statement of Reason

Dear James,

Please find attached a letter requesting for Statement of Reasons in relation to the referral decision for the above proposed action.

Kind regards

**Kaeko Omura**
**Managing Director | Polaris Coomera Pty Ltd**



**From:** s22 @environment.gov.au]
**Sent:** Friday, July 06, 2018 2:02 PM
**To:** 'Kaeko Omura '; s47F
**Cc:** 'Boyd Sargeant'; s22
**Subject:** 2017/8134 Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland - referral decision [SEC=UNCLASSIFIED]

Dear Kaeko Omura

Please find attached a letter and decision notice relating to the referral for the above proposed action. An invoice will be provided shortly.

If you have any questions about the process please feel free to call me.

Regards,

s22

Queensland Assessments and Sea Dumping section

Assessments and Governance Branch

Environment Standards Division

Department of the Environment and Energy

GPO Box 787 CANBERRA, ACT 2601
T 07 s22

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FOI 180918
Document 10

**From:** Barker, James
**To:** "Kaeko Omura"
**Cc:** s22 ; 's47F "; s22
**Subject:** RE: 2017/8134 Coomera Woods Master Planned Development, Coomera, Queensland - referral decision - Request for Statement of Reason [SEC=UNCLASSIFIED]
**Date:** Monday, 27 August 2018 12:19:39 PM

Hi Kaeko
As indicated in the statement of reasons that has been provided to you, we do not provide attachments to the briefing that forms that statement, for the purpose of the *Administrative Decisions (Judicial Review) Act 1977*. This is because the reasons for the decision are sufficiently detailed in the documents that have been given to you. If you wish to seek access to documents that are referenced in that statement, you would need to make a separate request under the FOI Act.
Regards
James

**From:** Kaeko Omura [mailto:kaeko@polariscoomera.com.au]
**Sent:** Friday, 24 August 2018 3:55 PM
**To:** Barker, James
**Cc:** s22 ; s47F ' ; s22
**Subject:** RE: 2017/8134 Coomera Woods Master Planned Development, Coomera, Queensland - referral decision - Request for Statement of Reason [SEC=UNCLASSIFIED]
Dear James,
Thank you for your statement of reasons dated 6 August 2018.
At page 8 of your statement of reasons, you state that "A total of 8 public submissions were received on the referral (Attachment H)."
There is no "Attachment H" to the statement of reasons.
Footnote 1 of your letter states that the statement of reasons will "not provided copies of documents that are otherwise publically available, or attachments to the briefing documents that are otherwise summarised in the briefing".
The eight public submissions are not available on the departments portal website. Further, the eight public submissions are only referred to, in brief, in one sentence contained within the statement of reasons. As such, we are unclear as to whether that sentence is indeed a summary of the eight public submissions, or if it is, whether it adequately summarises the matters and issues that were raises in the submissions.
Accordingly, and for completeness, we would be grateful if you could provide us with a copy of the eight public submissions, at your earliest convenience.
Kind regards
**Kaeko Omura**
**Managing Director | Polaris Coomera Pty Ltd**


**From:** s22 @environment.gov.au]

**Sent:** Tuesday, August 07, 2018 1:58 PM
**To:** 'Kaeko Omura'
**Cc:** s22 s47F
**Subject:** RE: 2017/8134 Coomera Woods Master Planned Development, Coomera, Queensland - referral decision - Request for Statement of Reason [SEC=UNCLASSIFIED]

Dear Kaeko

On 17 July 2018, you requested a statement of reasons for the controlled action decision and assessment approach decision made under the *Environment Protection and Biodiversity Protection Act 1999*, for the Coomera Woods Master Planned Development (EPBC 2017/8134).

As requested, please find attached the delegate's statement of reasons for these decisions.

Kind regards

s22

Director – Queensland South and Sea Dumping Section
Assessments and Governance Branch
Department of the Environment and Energy
**T:** (02) s22 | **M:** s22
**E:** s22 @environment.gov.au

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---

**From:** Kaeko Omura [mailto:kaeko@polariscoomera.com.au]
**Sent:** Tuesday, 17 July 2018 12:31 PM
**To:** Barker, James
**Cc:** s22 ; s47F
**Subject:** RE: 2017/8134 Coomera Woods Master Planned Development, Coomera, Queensland - referral decision - Request for Statement of Reason

Dear James,

Please find attached a letter requesting for Statement of Reasons in relation to the referral decision for the above proposed action.

Kind regards

**Kaeko Omura**
**Managing Director | Polaris Coomera Pty Ltd**



---

**From:** s22 @environment.gov.au]
**Sent:** Friday, July 06, 2018 2:02 PM
**To:** 'Kaeko Omura '; s47F
**Cc:** 'Boyd Sargeant'; s22
**Subject:** 2017/8134 Coomera Woods Master Planned Development, 49 and 51 George Alexander Way, Coomera, Queensland - referral decision [SEC=UNCLASSIFIED]

Dear Kaeko Omura

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If you have any questions about the process please feel free to call me.

Regards,

s22

Queensland Assessments and Sea Dumping section

Assessments and Governance Branch

Environment Standards Division

Department of the Environment and Energy

GPO Box 787 CANBERRA, ACT 2601

T 07 s22