



# Conserving the NATURE of the Moreton Bay Region



## **MORETON BAY REGIONAL COUNCIL DRAFT PLANNING SCHEME**

### **SUBMISSION BY MORETON BAY ECO-ALLIANCE**

Compiled & Presented by Mr Robert Ian Bell MSc MEIANZ  
9 Tully Street Bongaree Qld 4507

#### **Background**

Moreton Bay Eco-Alliance (MBEA) is an alliance of groups across the Moreton Bay Regional Council (MBRC) region working to protect the nature and lifestyle of the region.

MBEA has been following the development of the Draft Planning Scheme (Draft Plan) and has made submissions and media releases in the lead up to the consultation period. We wrote to Council about our concerns regarding the short time frame and methodology adopted for consultation. Council responded that the consultation was fixed by the State and could not be altered. By not responding to our request we feel that Council has missed an important opportunity for comprehensive engagement with its communities by way of local forums and meetings.

Following initial difficulties we experienced in grappling with the complexity of the planning framework and obtaining responses to our questions, MBEA representatives subsequently, during the last two weeks of the consultation period, had two productive meetings – one with the Director Strategic Planning & Development and another with four senior members of the planning team, as well as two sessions at the interpretative centre in Caboolture.

We trust that the effort we have made in examining the environmental aspects of the Draft Plan has provided a useful critique which Council will find productive, and upon which Council will reflect during the preparation of the final plan. MBEA and those we represent will certainly be looking anxiously to see how Council has responded to some of the serious shortcomings we have highlighted. As Council has advised, this current plan is a draft.

Following advice from Council, we have studied the several documents relevant to our particular interests including those listed below:

Green Infrastructure Strategy

Open Space Strategy

Our Tomorrow Community Plan 2021

Sustainable Planning Act 2009

Regional Planning Areas

Draft MBRC Environmental Management and Conservation Zone Code

Planning Scheme policies incl. Draft MBRC Planning Scheme Policy – Environmental Areas and Corridors; Draft MBRC Planning Scheme Policy – Neighbour Design

Draft MBRC Development Codes All



# Conserving the NATURE of the Moreton Bay Region



Draft MBRC Development Codes Other Development Codes  
Draft MBRC Strategic Framework  
Draft MBRC – Schedule 1 Definitions  
Maps including all overlays  
Draft MBRC Zone Codes  
Fact Sheets  
SF Green Infrastructure Network  
SF Regional Planning Areas  
And other sections too numerous to list.

Based on the above interaction with Council, our independent research and drawing upon our members' first hand experiences in the way Council has been managing its natural areas prior to and post amalgamation respectively, we have consulted with our members in making the following submission. All inclusions within this document, including material written previously, form part of this submission by MBEA because these documents are highly relevant to the Draft Plan.

As advised was acceptable by the Director Strategic Planning and Development, this submission has been co-ordinated by and is presented/lodged by the following MBEA member on behalf MBEA.

Mr Robert Ian Bell 9, Tully Street Bongaree Qld 4507. – a resident of this council region.

Mr Bell is a recognised, professionally qualified Environmental Scientist and Environmental Engineer, Member of the Environment Institute of Australia and New Zealand with some 30 years of experience in natural resource and environmental management. He has led state-wide and national projects and programs, receiving a number of awards for his work in these fields.

## **Context of MBEA's submission**

Much of the concern and comments made herein have arisen from the environmental tragedies which concerned residents and groups have been witnessing and reporting daily since the amalgamation of all Councils into MBRC. These include vast tracks of uncontrolled vegetation and tree clearing, displacement and decimation of wildlife, ugly landscapes, wall to wall housing with little or no green space, marauding Council contractors and or Council staff with chainsaws creating mountains of woodchips throughout the region.

There is no current data on the status of the area of vegetation cover and rate of loss of vegetation over the period of this Council. An image from the latest report available (2008) below identifies significant loss of vegetation in the MBRC region and from anecdotal evidence this trend is continuing. The photos below represent but a small sample of what is regularly occurring throughout the region.

In 2008, in response to a letter from four (4) community groups on Bribie Island who were concerned about the above issue, Council made a commitment in writing to address this by March 2010. When 2010 had passed and no action was forthcoming, further requests by the community received a response in 2012 with assurances that this would be dealt with in the Planning Scheme 2013/14 (six years after the initial request) through a range of new policies associated with the delivery of the new Planning Scheme. It was these sorts of experiences right across the MBRC region of Council's procrastination to deal with these important matters that led to the formation of our region wide group MBEA. After commitments by Council extending back six (6) years we are expecting and looking for evidence that these commitments are demonstrated in the Draft Planning Scheme.

MBEA believes that to date this region has witnessed six lost years of vegetation, habitat and wildlife protection and that the situation with respect to our vegetation, trees, habitat and wildlife is dire and at a critical tipping point where urgent action is needed.



**Vast area of coastal Wallum vegetation cleared (continuing) at Nolan Road Burpengary. This area of threatened coastal vegetation was offset to Ipswich region where this vegetation type does not exist.**



Alma Road Dakabin. Piles of woodchip foreground and background. Loss of habitat and wildlife.



Clearing the last remaining vegetation - Woorim foreshore, South Boyd Street.

**Commitment by Mayor MBRC 2008**

**Moreton Bay Regional Council**  
Incorporating Caboolture, Pine Rivers and Redcliffe

copy

Enquiries: Environment & Local Laws  
Direct Phone: (07) 5433 3000  
Our Ref: A1149063 (AB)

Date: 15 OCT 2008

Mr Ian Bell  
President  
Bribie Island Environmental Protection Association  
PO Box 350  
BRIBIE ISLAND QLD 4507

Dear Mr Bell

**PRESERVATION OF TREES AND VEGETATION**

Thank you for your letter dated 25 August 2008 highlighting your concerns regarding the unsustainable rate of tree and vegetation clearing.


Currently, controls with respect to tree clearing and vegetation management are through the respective District Planning Schemes, together with State and Federal legislation. Pine Rivers District also has a Local Law relating to tree preservation.

Moreton Bay Regional Council is working towards a "One Council" philosophy and through this process, policies, guidelines and Local Laws are being reviewed to address the needs of the Region.

Council has a timeframe of March 2010 to complete a review and implement its Local Laws. A report will be presented to Council by December 2008 prioritising this Local Law review process.

I thank you for bringing your concerns to my attention.

Yours sincerely



Councillor Allan Sutherland  
MAYOR



# Conserving the NATURE of the Moreton Bay Region



## Commitment by CEO 2012

Office of the CEO



Enquiries: Mr. Russell Garske  
Phone: (07) 3480 6564  
Fax: (07) 3480 6758

Our Ref: A7159800 RG:djr  
Your Ref: -  
Date: 1 August 2012

Mr. I. Bell  
President  
Bribie Island Environmental Protection Association  
PO Box 350  
BRIBIE ISLAND QLD 4507

Dear Mr. Bell,

### Vegetation Management Policy

I refer to your letter dated 21 June 2012 and advise that as you would be aware Council is currently drafting a new Planning Scheme for the Moreton Bay Region.

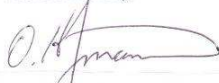
In drafting this Plan, Officers are using a "green infrastructure approach" to streamline and refine environmental mapping for the region.

The public consultation for the draft Planning Scheme and associated documents is anticipated to be in the period 2013/14. At this point the public will have an opportunity to review the Scheme and supporting documents and provide submissions to Council for consideration.

Vegetation clearing is mostly managed through the Planning Scheme. Policies that relate to the management of vegetation will be drafted in line with the Planning Scheme development and consultation sessions. Also these policies will link the Plan to on-ground vegetation management works that are conducted by Council employees and others.

Further advice will be provided to the community when the consultation period for the Planning Scheme takes place.

Yours sincerely,



**Daryl Hitzman**  
Acting Chief Executive Officer

#### Customer Service Contacts

PO Box 159 Caboolture QLD 4510 | T 3205 0555 | F 3205 0599 | E [mbrc@moretonbay.qld.gov.au](mailto:mbrc@moretonbay.qld.gov.au) | W [www.moretonbay.qld.gov.au](http://www.moretonbay.qld.gov.au)

Department of Environment  
and Resource Management

## Land cover change in the South East Queensland Catchments Natural Resource Management region

2008-09

### Summary

In 2008-09, the woody vegetation clearing rate for the SEQ region for was 3916 hectares per year (ha/year). This represents a 25% decrease from the previous era.

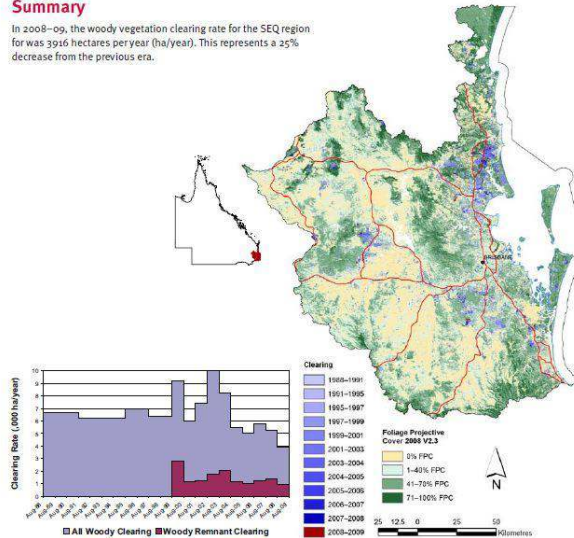


Figure 1. Woody vegetation clearing rates in the South East Queensland Catchments NRM region.

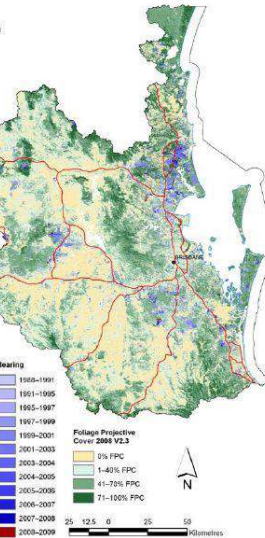


Figure 2. Woody vegetation clearing for each change period.

### MBEA's Meetings with Senior Council Planners

During discussions with senior Council planners during the consultation phase the following matters and associated questions (*italics*) were tabled and responses were requested.

### **QUESTIONS RE THE DRAFT MBRC PLANNING SCHEME 29 July 2014**

#### **Areas shown as green on the GIS layers – environmental corridors and other green areas except conservation parks.**

*Despite assurances by Planning Division that areas marked green are protected against all except State government actions to override the new Planning Scheme, why do some of these areas already show future impacts by development which appear on other layers? Are these green areas genuinely protected by future council actions or are they subject to the same sorts of disruptions, vegetation loss and other impacts that we have seen and continue to see every day in our existing “green” spaces over the period since this council has been in existence? What protection is provided under the plan for these “protected green” areas to stop them being cleared by landowners or developers etc?*

*Are all areas shown as green actually vegetated as opposed to sparsely vegetated remnants or are these the areas that a future plan hopes to achieve proper vegetative cover suitable for wildlife*



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*habitat? What plans are there to infill vegetation corridors where there are gaps of absent or sparse vegetation that hinder or defeat the intended purpose and function of these zones?*

### **Unsustainable loss of vegetation, habitat and wildlife**

*What has been the net annual rate of vegetation loss (hectares) over the last five (5) years within the MBRC region and what net rate of change of vegetation is estimated to result in coming years – say 5 and 10 years time from the land class allocations and protection status provided in the draft plan?*

*The Mayor committed in writing to enact a vegetation management policy way back in 2008 but this commitment has been continually dishonoured. One of the excuses for inaction given over the last 6 years has been that this will all be addressed in various plans for vegetation and species protection which will all be rolled into the new planning scheme. Please explain how vegetation and associated wildlife is protected and enhanced in the draft planning scheme to bring a halt and reversal to the unsustainable rate of vegetation loss within this council region which, according to Qld government reports in 2008 is the worst in South East Queensland?*

*How is the legislated requirement to protect “endangered” species listed as vulnerable etc. under National and State legislation e.g. the Koala, various bird species etc. reflected and demonstrated on a scientific basis in the draft plan in the way suitable areas of protected habitat have been assessed and allocated.*

*What is the scientific basis for the selection and allocation of “protected areas” corridors and green space for the purposes of providing adequate wildlife refuges within the region? Where is the science behind the decisions for the types, sizes, continuity of areas explained and demonstrated in the Draft Plan or have areas just been selected at random where they are currently available and likely to be able to be protected? What best practice standards and references have been adopted in deciding and allocating environmental reserves and corridors. In addressing the above questions we need to see supporting data in the plan, not just general statements and maps.*

### **Resources to enact and implement the plan**

*Associated with the mapping of these “Protected Areas” within the draft Plan is responsibility now, within the Plan, to plan to provide and implement appropriate management of these areas so they can be sustained into the future. We have repeatedly highlighted that there are insufficient existing staff in environmental management especially on ground works such as Bushcare, pest plant and animal species management, and have made submissions to council about the parlous state of pest management resources that currently exist. If these associated resources are not provided then the Plan is no more than lines on a map and a myth. So what policies and supporting budgetary frameworks are associated with the draft Planning Scheme to ensure that the intentions of the plan to protect vegetation and habitat are supported by adequate council resources – staff equipment etc. Are penalty provisions for breaches of vegetation protection provided and are they adequate to*



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*reverse current behaviour by developers and residents in illegally clearing vegetation? How many people have been prosecuted for illegal vegetation removal, interfering with wildlife or littering and damaging our natural areas during the term of MBRC? Where are these issues and problems discussed in the Draft Planning Scheme and what are the budgetary implications, how will the additional funds be generated – will there be a dedicated environmental levy for this need as exists in some neighbouring Council regions?*

*What are the implications of the Draft Planning Scheme generally with respect to future resourcing, legislation and enforcement (staff, equipment, accommodation, training etc.) necessary to ensure that the plan is successfully implemented as indicated and intended.*

### **Population**

*In the same way that the Plan needs to address the capacity of the protected areas and reserves to sustainably support, at a minimum, the existing levels of species diversity and numbers, human population carrying capacity of the region must also be addressed.*

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Council responded to the above questions by directing us to several areas and documents including those listed above containing a large amount of material (about 40 MB) within the enormous content of the Draft Plan which we read and studied. Although this material was helpful in better understanding aspects of the process and the Draft Plan, it did not address any of our key concerns satisfactorily, and despite further engagement with Council these critically important questions remain unaddressed.

We therefore felt there was an important need to elaborate further below on these same questions which we believe the Draft Plan must address (original questions in italics):

### **Areas shown as green on the GIS layers – environmental corridors and other green areas except conservation parks.**

*Despite assurances by Planning Division that areas marked green are protected against all except State government actions to override the new Planning Scheme, why do some of these areas already show future impacts by development which appear on other layers. Are these green areas genuinely protected by future council actions or are they subject to the same sorts of disruptions, vegetation loss and other impacts that we have seen and continue to see every day in our existing “green” spaces over the period since this council has been in existence? What protection is provided under the plan for these “protected green” areas to stop them being cleared by landowners or developers etc?*

*Are all areas shown as green actually vegetated as opposed to sparsely vegetated remnants or are these the areas that a future plan hopes to achieve proper vegetative cover suitable for wildlife*

*habitat? What plans are there to infill vegetation corridors where there are gaps of absent or sparse vegetation that hinder or defeat the intended purpose and function of these zones?*

Our response to this unanswered question is below:

The following extracts from the Draft Plan define important natural areas in the mapping as follows:

## 2.1 What is an environmental area?

Environmental areas are important ecological landscapes vital to protecting and maintaining the health and resilience of biodiversity within the region and allowing for the ongoing provision of ecosystem services to our community.

Environmental areas support wildlife breeding and refuge and describe a range of habitat types from native vegetation, wetland and coastal areas to places with scattered vegetation which wildlife use to forage, move through, breed and shelter.

Environmental areas recognise matters of local environmental significance, including the following values:

- Protected areas and conservation reserves;
- Priority and other native species habitat, e.g. koalas, shorebirds and fish habitat;
- Wetlands, waterways and coastal environments;
- Areas of environmental significance;
- High value water catchments.



Hays Inlet – an environmental area of international significance.

## 2.2 What is an environmental corridor?

Environmental corridors are functionally connected areas supporting animal and plant movement, dispersal and refuge. They contribute to maintaining the health and resilience of biodiversity, support ecological integrity and encourage genetic flow and diversity.

The environmental areas and corridors overlay identifies two types of corridors: (1) waterway and (2) ecological or over-land corridors that recognise matters of local significance including the following values:

- Waterways, including overland flow paths, tributaries, creeks and major rivers;
- Flood hazard areas;
- Coastline; and
- Over-land ecological corridors.

Due to limitations of scale, many small linkages may not be captured by this mapping and local corridor values are better identified and valued at development stage.



The Caboolture River forms a key regional east-west corridor.

N

However, detailed examination of the network of environmental areas Class 1 and environmental corridors revealed broad inconsistencies between the vegetated green areas and corridors which

actually exist compared with what is shown on the maps. “Functional Connection” is not generally displayed in these areas. Indeed many of these areas so mapped have no vegetation, or very sparse vegetation, and provide significant functional disconnection. This is completely contrary to what is depicted on the Draft Plan maps, instead there are vast expanses of cleared vegetation in these locations which presently provide very little or no vegetative cover, habitat or means of passage for wildlife. These areas are not the rich expanses of continuous wildlife corridors and environmental areas depicted in the mapping.

**Comparison of actual image at locations versus mapped environmental green areas and corridors**



**Browns Creek actual photo image**



**Browns Creek Environmental areas  
and Corridors – (green and shaded areas)**



**Youngs crossing actual photo image**



**Youngs Crossing Environmental areas  
and Corridors – (green and shaded areas)**



Caboolture River actual photo image



Caboolture River Environmental areas  
and Corridors – (green and shaded areas)

Environmental Corridors	
	Environmental Corridors
Environmental Areas	
	Class 1
	Class 2 - Vegetation Offset
	Class 2 - Koala Tree Offset
	Class 3
	Class 4

This begs the following questions of the environmental areas mapping in Draft Plans:

- What is the actual percentage area of vegetated environmental areas and corridors compared with what is mapped as such?
- What is the reason for such differences?
- If the mapping is just a vision for the future, how will these areas be enhanced to reflect what is shown in the mapping to achieve this vision?
- Where are the strategies, policies, partnership and funding arrangements for enhancing these often highly degraded areas to a standard where they actually provide suitably vegetated habitat and movement corridors for wildlife?



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### **Unsustainable loss of vegetation, habitat and wildlife (our original question in italics)**

*What has been the net annual rate of vegetation loss (hectares) over the last five (5) years within the MBRC region and what net rate of change of vegetation is estimated to result in coming years – say 5 and 10 years time from the land class allocations and protection status provided in the draft plan?*

*The Mayor committed in writing to enact a vegetation management policy way back in 2008 but this commitment has been continually dishonoured. One of the excuses for inaction given over the last 6 years has been that this will all be addressed in various plans for vegetation and species protection which will all be rolled into the new planning scheme. **Please explain how vegetation and associated wildlife is protected and enhanced in the Draft Planning Scheme to bring a halt and reversal to the unsustainable rate of vegetation loss within this council region, which according to Qld government reports in 2008 is the worst in South East Queensland?***

*How is the legislated requirement to protect “endangered” species listed as vulnerable etc. under National and State legislation eg the Koala, various bird species etc. reflected and demonstrated on a scientific basis in the Draft Plan in the way suitable areas of protected habitat have been assessed and allocated.*

*What is the scientific basis for the selection and allocation of “protected areas” corridors and green space for the purposes of providing adequate wildlife refuges within the region? Where is the science behind the decisions for the types, sizes, continuity of areas explained and demonstrated in the Draft Plan or have areas just been selected at random where they are currently available and likely to be able to be protected? What best practice standards and references have been adopted in deciding and allocating environmental reserves and corridors. In addressing the above questions we need to see supporting data in the plan, not just general statements and maps.*

Our response:

We ask the above questions because of our concern at the unsustainable rate of vegetation loss that has been occurring over the last six years and before, and Council’s failure to address this despite commitments to do so as far back as 2008. Moreover we see no evidence in the Draft Plan that the commitment made by Council in 2012 has been fulfilled in the Draft Plan (refer MBRC letters above):

Given Council’s history of avoiding action on this front it is reasonable to question whether Council is genuinely committed to addressing and reversing the historic unsustainable rate of vegetation and habitat loss within this Council region. The following statements in the Strategic Framework would seem to indicate that Council is intending to address these issues. Several areas of the Strategic Framework quoted below adopt statements with words like “Protected, managed and enhanced” in this context:-



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### 3.4.1 Strategic Outcome – Biodiversity conservation

*Biodiversity and associated ecosystem services of the Moreton Bay Region will be protected, managed and enhanced, and resilience of ecosystems to the impacts of climate change and other environmental challenges will be maximised.*

### 3.4.2 Strategic Outcomes – Koala Conservation

*1. Strategic koala habitat networks will be conserved and expanded to ensure strong and safe habitat and linkages for koalas across our Region*

### 3.4.3 Strategic Outcomes- Coastal management

*The natural values of all coastal areas, including Bribie Island, Pumicestone Passage, Deception Bay, Redcliffe peninsular, Hays Inlet and the Pine Rivers estuary and their associated coastal features and processes will be maintained, protected and enhanced.*

### 3.4.5 Strategic Outcomes -- regional landscape areas

*Healthy, diverse and productive rural and coastal landscapes are maintained and enhanced, for multiple environmental, recreational, cultural, economic and scenic amenity values.*

However on examining key policy documents such as the Draft Planning Scheme Policy, Environmental Areas and Corridors, which is the only policy of the 20 total Draft Plan policies purporting to address these aspects of the environment, it is apparent that it contains comprehensive sets of “Planning and Design Principles” and several extracts and interpretations of good practice from a wide range of sources, but does not provide sufficient policy direction to confer the above broad Strategic outcomes.

The Draft Plan needs to incorporate clearly defined policies – not general guidelines and visions for the future. The critical policy direction for successful delivery of the various strategic outcomes above is absent. The important steps for establishing firm targets set by policy are missing. Neither is there any assessment or measurement of performance or success against the strategic framework.

### **Vegetation, habitat and associated loss of wildlife**

We asked the above question “*What has been the net annual rate of vegetation loss (hectares) over the last five (5) years within the MBRC region and what net rate of change of vegetation is estimated to result in coming years – say 5 and 10 years time from the land class allocations and protection status provided in the draft plan?*” because this is the fundamental data upon which Council will need to rely in setting future targets and assessing its performance. This information was not available. How can the success of the Plan be evaluated if such vital information is not available and not provided to the community as a benchmark against which the success of the above strategies can be assessed and reported?



## Conserving the NATURE of the Moreton Bay Region



Council needs to establish policies which regulate how it will measure and assess its environmental performance against stated objectives. Lidar measurement of all environmental areas and corridors over time is an obvious tool that would facilitate a transparent process for monitoring and reporting to the community about the status and changes in these areas and whether the aims of the Plan were being achieved.

### **Green Infrastructure Strategy**

MBEA holds serious concerns about the Green Infrastructure Strategy which is a key document setting the framework for the environmental section of the Draft Plan. At the time of its release early in 2014 we made enquiries to the planning division and were informed that there were no formal consultation arrangements for this strategy but that we could send something in if we wished. We felt that this response at such a critical stage for a document which formed such an important foundation for the Draft Plan signalled Council's unwillingness to properly engage with the community. We therefore took the step of making the following press release which includes comment on aspects of the Green Infrastructure Strategy – and which remains as part of our current submission.



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### **MEDIA RELEASE**

MORETON BAY ECO-ALLIANCE 12 Mar 2014

## **MORETON BAY REGIONAL COUNCIL PLANNING SCHEME - WHERE IS THE CONSULTATION?**

Moreton Bay Eco-Alliance (MBEA) is an alliance of groups across the Moreton Bay Regional Council (MBRC) region working to protect the nature and lifestyle of the region. We believe that residents of this Council region are being kept in the dark about MBRC's imminent release of its new Planning Scheme, scheduled early 2014.

The new Planning Scheme, which all councils are required by the State Government to undertake at this time, will introduce many critically important and sweeping changes to several aspects of all residents' lives and lifestyles, yet we are finding that hardly anyone knows anything about this new plan or its imminent release. Under the *Sustainable Planning Act 2009*, all new planning schemes must "ensure all of the community's needs are reflected in the final plan". However the central statement by Council on the plan is "The strategic framework provides a vision and strategy for the Moreton Bay Region, accommodating growth and development to 2031." MBEA believes such a development-oriented vision for the future does not represent the views, vision, and aspirations of the majority of residents. During coming years we believe residents will gradually discover, just as we are witnessing in Sydney, Brisbane and the Gold Coast, that their lifestyles will be dramatically and irreversibly disrupted.



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The “Brisbane Times” has recently quoted a Queensland planning expert - Adjunct Associate Professor Heywood - as condemning Brisbane City Council’s recently released new City Plan 2014, saying he fears the 2034 metropolis will be stripped of the current garden character; is a vision fuelled by economic development, at the expense of the environment and, rather than creating a city akin to some of the best planned European cities, it would essentially create an urban desert and will look a bit like Chicago does now. These are precisely the sorts of fears held by MBEA about the future of our region. However, with the alarmingly high rates of destruction of our natural areas, vegetation and native animals, which we witness every day, our region is likely to fare much worse.

Continued exponential growth, over-crowding, ever greater traffic congestion, inappropriate industries and developments, and the loss of our natural environment, bushland, native animals, birds and lifestyle are not the reasons why so many of us chose to live in the MBRC region.

The fact that Council’s public consultation process will be undertaken only after the release of the new MBRC Planning Scheme means that residents can anticipate that it will be too late to expect any sort of proper and thorough consultation. The die will be cast, and to try and make any comprehensive changes to the Planning Scheme after its release will be like trying to unscramble an egg that has been privately incubating, undisturbed, since 2011. The arrival of the “creature” that is about to hatch is imminent!

MBRC carried out a community survey in 2011, the results of which Council said were the basis of the development of the document “Moreton Bay Region Community Plan 2011-2021” The requirement for a “Healthy Natural Environment” was listed as a key component of that plan. Council has since rolled out strategies titled “open space, community infrastructure, transport, water and the environment”. These apparently form the backbone of the new Planning Scheme. MBEA has scrutinised the Moreton Bay Region Community Plan 2011-2021 and the above strategies. We found it virtually impossible to penetrate the Community Plan or any of these strategies and uncover the implications for our communities that lurk behind all the warm, pretty pictures and fuzzy motherhood statements which assure us of a bright new future for all.

Of particular relevance in Council’s Community Plan is the “Green Infrastructure Strategy” component of the Environment Strategy. The Green Infrastructure Strategy is the latest in a long list of disappointments over the last five years. During this time MBEA members have been liaising with Council to try and improve environmental management and protection in this region. It’s over five (5) years now since two of MBEA’s groups and two other community groups wrote to Mayor Sutherland in August 2008 requesting Council to take urgent action and initiate policies to reverse the crisis of rapidly disappearing vegetation and the habitat of our native animals and birds which are being decimated as a result. In his letter of 15 Oct 2008, the Mayor responded with a commitment to wide-ranging action to protect our trees and vegetation by March 2010. However despite several further requests and meetings with council, and Council’s further assurances, their continued lack of response is a sad and devastating confirmation that all of Council’s commitments on this issue have been broken and remain unaddressed in the supporting documents that will largely define the new Planning Scheme.

Even though natural ecosystems are included in the stated scope of this Green Infrastructure Strategy, it fails to protect our native vegetation and the natural habitat of our native animals. Instead the document’s focus is to “enable growth and build development confidence through flexible management of environmental values”. What this convoluted statement reveals is that the real purpose of the document is framed around facilitating more and more development, with the natural environment continuing to be subjugated by hard infrastructure. We have lost and will continue to lose vast tracks of natural vegetation, with catastrophic results for our residents and native animals.

If you doubt that this is Council’s vision for the future, it is not necessary to look any further than the recent MBRC decision to bulldoze a four lane road, the West Petrie Bypass, right through the middle of some of our most important natural bushland and parks. In its decision Council has ignored the advice of its own consultants to avoid this \$125 million route and instead adopt a less expensive and much lower impact route which avoids these high value natural areas. In similar vein is the export to Ipswich by way of an “offset”, (possibly illegally)



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of about 40 hectares (100 acres) containing endangered Wallum coastal vegetation which was cleared adjacent to the Bruce Highway at Nolan Road Burpengary. This precious vegetation type does not exist in the Ipswich region. Is this the sort of example that is implied by Council's policy statement of "flexible management of environmental values" in the Environment Strategy of the new Planning Scheme?

The Green Infrastructure Strategy talks a lot about animal underpasses, overpasses, barriers and vegetation offsets etc. as being the solution to mass disruption by infrastructure of our natural areas and native animals. However, Koalas cannot survive translocation from their natural habitat to remote offsets of newly planted saplings! In emphasizing such bizarre solutions, Council appears to be trying to distract us from the real and urgent priority: - to protect the important natural areas we already have, but which are disappearing at a truly alarming rate. We cannot allow the continued, unhindered fragmentation and relinquishment of our special natural areas to hard, hot, treeless infrastructure.

The Green Infrastructure Strategy is just one deeply flawed component of MBRC's new Planning Scheme 2014. It would be wise for all residents to closely examine every aspect of the new Planning Scheme upon its release and carefully consider its long-term implications for the lifestyle and image of our region to 2031 and beyond. Remember that under the *Sustainable Planning Act 2009*, Council must "ensure all of the community's needs are reflected in the final plan". From what we've discovered already, unfortunately, we anticipate that MBRC's new Planning Scheme is not likely to satisfy this critical test.

Attached: Letter to the Mayor re the need for a Vegetation Policy and reply from the Mayor Aug 2008

*Sustainable Planning Act 2009*: <http://www.dsdp.qld.gov.au/local-area-planning/local-government-planning-schemes.html>:

The *Sustainable Planning Act 2009* (SPA) replaces the *Integrated Planning Act 1997*. The SPA seeks to shift the focus from the planning process to delivering sustainable planning outcomes. It introduces some changes to the plan making process, such as:

- preparation of a strategic land-use plan
- **increased emphasis on community engagement - to ensure all of the community's needs are reflected in the final plan**
- greater flexibility - to cater for unexpected changes
- new streamlined ways for local governments to amend their planning scheme to reflect these changed circumstances

ENDS

### **Offsets etc.**

MBEA also expressed our concerns in writing below about the serious risk of local extinction of our Koalas and the strong reliance of instruments such as offsets in Council's strategy to deal with Koalas.

Despite their several impracticalities which we observe and document, offsets features strongly in the Draft Plan. It is of great concern that Council intends to sell the right to offset vegetation and habitat loss with a cash payment from developers to Council. It is also concerning that this revenue to Council will not be quarantined and will therefore presumably go to general revenue.

This will create the temptation and opportunity for developers to buy environmental destruction, the money from which can go straight to Council's general revenue without being quarantined for compensatory environmental offset works. Such arrangements can be guaranteed to lead to "improprieties". Over the past six (6) years there have been several recorded highly dubious arrangements between Council and developers, residents etc. to allow totally inappropriate vegetation clearing. These have been reported at the highest levels of Council but no action has



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been taken. This sort of use of vegetation as an opportunistic and immoral, possibly illegal, bargaining tool must not be allowed to continue in the aftermath of the Draft Planning Scheme.

### **Resources to enact and implement the Draft Plan**

Associated with the mapping of protected areas within the Draft Plan comes responsibility to provide and implement appropriate management of these areas so they can be sustained into the future. We have repeatedly highlighted that there are insufficient existing staff in environmental management, especially for on-ground works such as Bushcare, pest plant and animal species management and have made submissions to council about the parlous state of pest management resources that currently exist. If these associated resources are not provided then the Draft Plan is no more than lines on a map and a myth. What policies and supporting budgetary frameworks are associated with the Draft Planning Scheme to ensure that the intentions of the plan to protect vegetation and habitat are supported by adequate council resources – staff equipment etc? Are penalty provisions for breaches of vegetation protection provided and are they adequate to reverse current behaviour by developers and residents in illegally clearing vegetation? How many prosecutions for illegal vegetation removal, interfering with wildlife or littering and damaging our natural areas have occurred during the term of MBRC? Where are these issues and problems discussed in the Draft Planning Scheme and what are the budgetary implications, how will the additional funds be generated – will there be a dedicated environmental levy for this need as exists in some neighbouring Council regions?

What are the implications of the Draft Planning Scheme generally with respect to future resourcing, legislation and enforcement (staff, equipment, accommodation, training etc.) necessary to ensure that the plan is successfully implemented as indicated and intended?

The following was our submission to a workshop on this issue which we resubmit as part of our comment on the Draft Plan because of its relevance in that broader context.

### ***MBRC Animal Pest Management Workshop - 5Feb 2014***

*Comments by Ian Bell, Patron Bribie and District Wildlife Rescue etc.*

*I was very pleased to be invited to attend this workshop and assist in the evaluation and provision of feedback on this critically important program. Thankyou.*

*I have read Council's summary of the workshop. Some key issues which were raised at this workshop, and some other issues discussed do not appear in the workshop summary and these are discussed below:*



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*Council is very fortunate to have such dedicated, committed and experienced staff working in these programs and related programs such as Bushcare. Staff in all these areas are under tremendous strain as so few staff attempt to deal with such massive challenges in our region. This is Australia's third largest Council by population and has massive feral and pest animal problems which are directly correlated to humans and population. This is resulting in tremendous damage to our wildlife and the natural environment, yet council has only assigned two staff and one trainee to deal with this program. Moreover, the operational budgets made available to these areas of Council's responsibilities to support the activities of these dedicated staff, including partnering with the community, is totally inadequate.*

*The difficulties faced by this area of Council's responsibilities became immediately apparent at the commencement of the workshop when such a meagre list of three (3) priorities was displayed. This was an indication of both the lack of resources available to this section of Council and the very disappointing lack of understanding and priority currently placed on these issues by Council's senior management including the Mayor, Councillors, CEO and relevant Directors – none of whom attended the workshop:*

- 1. Reduce the spread of aquatic weeds throughout the region*
- 2. . Effective integration of declared plant management into operations across Council including design manuals etc.*
- 3. Wild dog management across all land types including State lands.*

*Later in the proceedings when attendees were asked to nominate areas of high value to assist Council in prioritising its pest management activities, quite a few people, including myself were totally taken aback because of what this revealed about Council's apparent lack of detailed knowledge of the location, extent and nature of our high value areas. With the amount of information available on the various State and Council databases one would have expected that Council was well equipped with this information via detailed GIS overlays etc. of relevant data on all high value areas to guide management of our natural areas. If such essential information is missing then acquiring and organising it into a useful format is an urgent priority for Council to guide all its planning activities so as to avoid the current unsustainable, ongoing, irreversible damage to our natural areas and loss of endangered species etc.*

*What this all says about MBRC is that it doesn't currently place much high importance or value in these areas of responsibility and is apparently content with just bumbling along trying to keep up appearances. It is unfortunate that Council does not understand the critical importance of these programs in maintaining and enhancing the values and image of this Council region.*



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*Council is currently failing to provide the type of leading role that is necessary for several pest program management problems such as Fire Ants, Tilapia and Indian Myna, instead apparently relying on the community to lead such programs which may include identification, reporting, trapping etc. Failure to provide and invest in proper leadership, community consultation and co-operative programs at Council level across all pest animal issues can lead to major and hugely expensive legacies in the future. Legacies such as the imminent extinction of several endangered species like Koalas; out of control outbreaks of Fire Ants etc. If this is allowed to continue unchecked it will lead not only to a greatly diminished image and natural value of this MBRC area generally, but also can have immense impacts on the viability of the entire future plan for the region. For example in the continued absence of any program of education, vigilance and community engagement in a sub-program like Fire Ants – a curse on tourism, lifestyle and the local economy - which, based on overseas experiences, could conceivably run into costs in the tens of millions of dollars annually within the MBRC region.*

*MBRC needs to take a much more proactive role in managing and controlling -including regulation and penalties - of all pest animal issues for which it has responsibility with this Council region. Council needs to re-examine all its programs and expenditure in relation to animal pest management and plant pest management including all its natural area programs like Bushcare etc. Failure to do so is a failure to invest in the future of this region, failure of the future vision of the regional plans, and failure to undertake clear primary Council responsibilities under these key programs.*

*I was pleased to see that Council is not using contractors to carry out the important work under this program. Use of contractors is not recommended for several reasons including a fundamental lack of “ownership”, care and responsibility of/for the problem, loss of corporate knowledge of the extent and critical details of the problem etc.- all of which have recently become apparent in Council’s previously contracted waste management operation in our natural areas which was failing dismally and which Council has now wisely returned to much improved management by its own excellent waste management staff.*

*It is noted that Council does not have an environmental levy as does the Sunshine Coast Council and other Councils to deal with this sort of issue.*

*Come on MBRC – let’s all move together into the 21st Century for a better region and properly manage these emerging threats to our future sustainability, image, professional and ethical standards and lifestyle.*



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### Population

A major issue which remains unaddressed in the Draft Plan is that there is no reference anywhere to future population levels which can be sustainably be supported in this Council region without adversely affecting and undermining quality of life and irreversibly impacting on our natural environment. It is these very attributes which attract people to the area and define its image locally and internationally. In our conversations with the senior planners there was an expressed inevitability that growth would just continue exponentially and that Council was defenceless against the policies and trends championed and enforced locally by National and State government(s).

Some estimates by Council for the faster growing regions have been quoted at 3.3% annually, e.g. in newsletters. This corresponds to a doubling time of about 21 years. The issue of population growth pressures arose at the Pumicestone Catchment Management Group forums where MBEA is represented. Internal discussions and the report from this group reflect their acknowledgement that population growth may be a determining factor affecting the viability of the Pumicestone Catchment Management Plan to achieve its goals. For example, water quality in Pumicestone Passage has been languishing at an unsatisfactory level C. This was one of the key drivers for the establishment of this group. This doubling of population in this rapidly growing region and neighbouring regions which contribute pollution and other impacts will require every person's impact in the region – not just new arrivals - to be halved just to maintain the current totally unsatisfactory water quality condition. It is highly unlikely that such a reduction would be achievable.

As growth continues unabated such challenges are evident throughout this entire region and are being expressed by traffic problems, inadequate public transport and medical services, environmental devastation, and rising costs of living including rates, levies and other charges. We have brought these matters to Council's attention previously – see below:

In the same way that the Draft Plan needs to address the capacity of the protected areas and reserves to sustainably support, at a minimum, the existing levels of species diversity and numbers, human population carrying capacity of the region must similarly be addressed.

We do not expect our Council to simply sit back and remain inactive in the face of this overwhelming trend. We believe it is Council's responsibility to define an appropriate level of maximum population in the region commensurate with the Draft Plan's visions and objectives. We expect Council to clearly flag these limits to growth and to work co-operatively with State and National governments in addressing this current irrational trend and path to chaos.

We therefore resubmit, as part of our comments the following analysis which we sent to Council in Sept 2012 and which was also referred to and quoted at a RDA Moreton Bay Region meeting about that time.



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### **UNSUSTAINABLE GROWTH IN THE MORETON BAY REGIONAL COUNCIL AREA**

*I recently attended a presentation by "Regional Development Australia - Moreton Bay Region. This is a partnership between all levels of government. Their stated focus is on the economic, social and environmental issues affecting communities and their slogan is "We've got it all". The goal of their environmental objective is to "support ongoing sustainability". The use of the word "ongoing" is interesting, because sustainability is by definition ongoing - forever. Governments really struggle with this concept. Time and time again governments at all levels demonstrate a preoccupation with decision making within an election cycle timeframe and tend to forget that sustainability is at the heart of our future.*

*So it was no real surprise to me that the presentation at the meeting focussed on the perception of fortunate opportunities presented for business, employment and "development" by having one of Australia's highest rates of population growth. I listened carefully but did not detect any discussion about how we would achieve environmental sustainability.*

*During question time I asked if there had been any consideration given to the maximum sustainable population our region could support and if perhaps too much growth could be a problem. I felt a palpable tension in the room during the brief pause that followed. However recovery and response was quick, brief, but unconvincing, and can be paraphrased as: "Something to look into," "Growth is inevitable", "Any more questions?"*

*The axiom that "growth is good" (and more of it is even better) has infiltrated our society in much the same way as mindlessly repeated trendy affirmations like "at the end of the day" and "going forward". There is a very poor level of understanding or debate about the issue of growth. Few understand the implications of exponential growth and its rapid doubling power. Even at the seemingly benign population growth rate of 3.3% stated in one Moreton Bay Council newsletter for the northern region, our current population will double in just over 20 years time!*

*Such rapid growth has massive implications for the cost of infrastructure. With assets such as water and sewerage networks having a life of about 50 years, it is necessary to replace 2% of them each year. With population growth of just 2% per year, an additional 2% of such infrastructure must be provided each year resulting in a total infrastructure bill of the 2% replacement cost plus an extra 2% for new people or 4% overall. This is the basis of warnings by Dr Jane O'Sullivan from the University of Qld that at even a modest rate of growth of 2% annually, the infrastructure bill doubles each year, but the number of new ratepayers to foot the massively higher bill is only 2% more. Such is the nature of unsustainable growth.*

*Current limits have already been reached or are fast approaching for virtually all services. Our council and councillors are not considering nor do they appear to see it as being within their purview to consider how 100% more water, hospital beds, infrastructure etc. will be delivered in as little as 20 years' time. Somebody else's concern it seems. The current rate of expansion will cause huge impacts on our future standard and cost of living. We are seeing the start of this already in the cost of rates, water, electricity, vehicle registration etc.*

*I asked an RDA community representative present if they were aware of the difference between growth and development in relation to the economy. It was apparent that the person I asked, like most of us, thought of these terms in the same way. Economic development is different from economic growth in that there is a consideration of improved lifestyle and sustainability inherent in the concept of economic development and totally absent in the definition of economic growth. It is not necessary to have high growth rates to have a high*

standard of development. For example, Norway, which has a population growth rate of just 0.4% (30% of Australia's), is reported by the UN Development Program as actually having a higher Human Development Index (HDI) than Australia.

**Uncontrolled growth is inevitable, but only if we continue to believe that we can do nothing about it. There is plenty we can do about limiting and managing uncontrolled growth, starting with the imminent review of the MBRC planning scheme. As stated, the slogan of Moreton Bay Regional Development Authority is "We've got it all". I'm more than a little concerned that if we continue as we are, when a son or daughter asks their parents in the not too distant future "What happened?" the reply might be, "Well sorry but – We've had it all!"**

Below are some definitions:

### **Growth**

To grow is to increase in size or number. Uncontrolled growth describes the process of getting exponentially bigger and bigger. Examples of exponential growth include overpopulation, cancer cell regeneration, and nuclear explosions.

### **Development**

In economic progress we talk about development when individual and communal needs are satisfied at higher and higher levels and/or the load on environment, raw material and energy including working hours required for production; are reduced. The level of development indicates those production and social stages which are achieved by the process of development. Development per se does not reveal anything about the presence or absence of growth. Development and growth may march hand in hand, but this is not necessary, they may separate from each other.

### **Sustainability.**

"Development that meets the needs of the present without compromising the ability of future generations to meet their own needs." UNESCO.

**Recommended essential reading:** "Bigger or Better?" by Professor Ian Lowe ; "a short history of progress" Ronald Wright. (Both in MBRC library)



New Housing Estate MBRC - Source: NearMap



# Conserving the NATURE of the Moreton Bay Region



## **Visions, Guidelines, Strategies, Strategic Outcomes, Plans and Policies**

Macquarie Dictionary - Policy: *1. a definite course of action adopted as expedient or from other considerations.*

It is very difficult to follow any logical thread or sequence in the Draft Plan through the above planning components. This is in part because the use and meanings of the terms have commonly been inappropriately interchanged. Where there are policies they do not go far enough and do not provide the necessary path to achieve the broadly stated Strategic Outcomes, or the policies necessary to accomplish the Strategic outcomes are simply absent.

For example in regard to the purpose as stated in 1.1 of the “Policy on Environmental Areas and Corridors”:

### **1.1 Purpose**

The purpose of this planning scheme policy is to outline the information required for a development application, and provide guidance and advice on how development can satisfy the assessment criteria associated with environmental areas and corridors. The policy provides guidance for avoiding or otherwise lessening the adverse environmental effects of development, including through the use of environment offsets as a last resort, to achieve a healthy environment.

The purpose of this policy is therefore focussed on processing development applications in these areas and avoiding and lessening adverse environmental effects of development. The first part of this “Policy” consists of guidelines and practices suggested or recommended for operation within the above policy space. The last part does contain policy but this is severely constrained within the above limited scope.

This might not be so serious if it were not for the fact that this “Policy on Environmental Areas and Corridors” is the only policy on environmental matters of the total 20 Policies listed in the policy schedule. Policies which support the grand visions of the Strategic Outcomes: 3.4.1 Biodiversity Conservation, 3.4.2 Koalas 3.4.3 Coastal management are not listed within these 20 policies and cannot be found elsewhere – they do not exist.

The Draft Plan, in terms of how it addresses our particular area of interest – the environment - presents several visions for the future but lacks the firm, comprehensive policy direction necessary to achieve these visions. Also absent is the essential, scientifically based assessment of the current condition – extent and quality - of our environmentally important areas and their suitability for intended purpose. Neither is there any provision in the Draft Plan for monitoring, assessment and audit of the success of the Draft Plan against its stated objectives. In light of the current environmental situation and condition, the challenges for the new Planning Scheme are significant and will require significant changes to the current business model, particularly the current legislative frameworks including enforcement, and provision of adequate resources and funding arrangements. The Draft Plan has avoided raising or discussing these critical potential limitations to success.



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We foreshadowed these limitations in the Draft Plan in our comments above on the Green Infrastructure Strategy. The inadequacies we highlighted have fed directly into this disturbing and totally unsatisfactorily outcome in the areas related to the environment in the Draft Plan.

Taking but one example e.g. Koalas – a critically endangered species within this region classed as vulnerable and a key indicator species and test of the success of the plan's effectiveness:- There is no data provided on the total existing area of vegetation suitable for actual habitat for this species, no Koala numbers, nor any accompanying referenced studies supporting analysis of the suitability of the existing extent of habitat to ensure the sustainable survival of this species. Instead we see several ideas about how to minimise impacts on Koalas but no real plan or policies to ensure their survival. This weakness in the Draft Plan and its policies is further demonstrated by the absence of any plans and policies to monitor the effectiveness of existing habitat in terms of Koala mortality. Once they have been implemented, there is no way of establishing whether the range of ideas put forward in the Draft Plan are actually working to effectively halt and reverse koala decline towards extinction.

Sure, disease is a complicating factor but our specialists researching and working in this field have advised us that the most important issue to address re Koala survival is adequate suitable habitat. Stress from inadequate habitat provision is thought to be a driver towards increased disease and weakening of the immune system. We have communicated this previously to Council in our correspondence below:

Moreton Bay Eco Alliance  
eco.alliance.mb@gmail.com  
12 Mar 2014

Mr Chris Teitzel  
Director Community and Environmental Services  
Moreton Bay Regional Council  
PO Box 159  
Caboolture QLD 4510

Dear Mr Teitzel

### **Koala and Wildlife Protection - Moreton Bay Regional Council**

On 19 July 2013 we wrote to the Mayor about our concerns regarding the rapid rate of loss of our native forests and bushland within the MBRC region and the wildlife inhabiting these precious areas. The Mayor has directed us to you as the responsible Director for these matters. The following is an extract from that letter (with slightly modified first sentence), which is attached, along with the Mayors letter of reply of 22 August 2014:

*Specifically, what has galvanised so many residents into action is the escalating decline of koalas in the region. The koala, Queensland's faunal emblem is an Australian animal icon drawing tourists from Australia and all over the world is now a nationally declared species at risk. The imminent*



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*collapse of our koala population is being perceived as a critical indicator of a general culture that exists within MBRC of a lack of empathy, care and respect for our natural areas, flora and fauna. Our koalas are like the “canary in the coal mine” with its unlikely survival and the lack of any apparent plans to ensure its future within this council region sending alarms signals from north to south; east to west.”*

A considerable time has elapsed since we received the Mayor’s reply. During this time we have undertaken consultation and research which, in relation to the Mayor’s response, has led us to the following conclusions:

Regarding the Mayor’s statement that *“Council is working in partnership project to raise awareness, demonstrate koala sensitive development and secure habitat”*:

The general community does not currently have a clear picture of how Council plans for and demonstrates protection of koalas and their assured survival in the region. Neither is there any evidence, as one drives around the region, of any *“sensitive development”*. Such is the concern of the community about the extent of tree and vegetation clearing for all developments– with generally not a single tree standing afterwards – that MBEA recently organised a protest rally adjacent to such a development on Gympie Road at Lawnton which created a lot of interest and support.

We agree with Council’s approach of *“securing habitat through permanent conservation agreements”*, but remain very concerned about the detail of such agreements and are currently unconvinced from what we see that these agreements will offer the habitat security to ensure the protection and survival of koalas and other wildlife. However we hope and trust to see this clearly demonstrated within the new planning scheme.

Regarding the stated claim that council provides *“support to local koala community groups”* the funding of approximately \$12,000 per year provided to koala care groups is important and helps keep these amazing volunteers going. Sadly it is not nearly enough to address the treatment from carnage and disease that is occurring. Similarly Council’s budget for pest animal management, which includes wild dogs, a major factor in Koala decline, is totally inadequate for a council which is the third largest in Australia by population. Greater investment to support strategies to reduce the incidence of wild/domestic dog predation is essential to the sustainability of the Koala population.

We agree that Chlamydia is a major factor affecting koala health and survival and strongly support the programs outlined. However, we have had discussions with one of the lead researchers of this program who has advised us that, important as addressing Chlamydia is, the priority for koalas survival remains the provision of adequate suitable habitat. Any new habitat needs to be suitable and sustaining. Translocation of koalas and wildlife generally from existing beneficial vegetation types into offsets, which we have been informed is a prominent strategy of Council, needs to be of the highest standards of scientific rigour in the choice of receiving sites in order to be successful. There are many obvious reasons why offsets may not be adequate in comparison with the original habitat including noise, disturbance, immature and unsuitable vegetation, disruption of family structures etc.



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Stress from inappropriate habitat is likely to be a factor in weakening the immune system of wildlife and increasing the probability of disease.

One of our most experienced Koala carers, Environmental Scientist and President of Koala Action Inc. - Wanda Grabowski, has informed me as: “Disease is now increasingly a cause of admission of Koalas into wildlife hospitals such as the Australia Zoo Wildlife Hospital and covers a range of disease vectors. Chlamydial disease is endemic in all koalas from Queensland and New South Wales. Scientists and researchers suggest that the reason for its severity in the northern species relates to the presence of the retrovirus KoRv. This was discovered in koala DNA by Dr Jon Hanger in 1999. KoRv in koalas operates similarly to HIV/AIDS in humans impacting directly on the immune system rendering QLD/NSW koalas more susceptible to diseases such as leukaemia, lymphoma and other cancers. More funding needs to be provided to ensure the success of the Chlamydial vaccine trial being undertaken on koalas along the Moreton Bay Rail Link route and in undertaking essential research into KoRv”.

In summary, we are confident in our assertion that the key to the survival of our native species lies in the preservation of adequate suitable habitat, and that the greater the disruption, fragmentation and translocation that occurs, the greater is the certainty that much of our wildlife will be irreversibly impacted towards possible local extinction. The simple fact is that land clearing is still the biggest factor in Koala decline. Even if MBRC undertakes replanting activities, which is commendable, in and of itself this would not resolve the issue because for every one tree planted another 100 go to the ground at the hands of chain saws and bulldozers. Escalating clearing and fragmentation of bush land habitat is the reason why Koalas are struck by motor vehicles and attacked by domestic and wild dogs. This has all led to a 68% decline in Koala population in the Koala coast in the 10 years to 2010 (DERM 2010). A much greater investment by Council is urgently needed to protect our wildlife and to assist in the rehabilitation of injured and displaced wildlife, especially Koalas.

Mr Teitzel, the possible legacy from MBRC planning decisions of local extinction of Koalas needs to be avoided at all costs. This risk is being presented on your watch as the relevant MBRC Director. We strongly support you in your endeavour, with the knowledge and awareness of these matters which we know you and your staff possess, to communicate the necessary actions and plans to your colleagues, Councillors and decision makers. We trust that the new planning scheme will address the crisis within the region, this 21<sup>st</sup> century crisis – a time of record species extinctions.

We look forward to the new planning scheme to deliver solutions to the issues raised and to comprehensive consultation and co-operation with Council during the rollout of the plan.

Yours sincerely

Moreton Bay Eco-Alliance



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Moving to the broader aspects of scientific rigour required to ensure that adequate total areas of suitable vegetation type are provided throughout the region, there is no evidence of any “stocktaking” of existing environmental vegetation conditions to act as a baseline for future reference as to whether the Plan is meeting its stated objectives.

e.g. 3.4.2 Strategic Outcomes – Koala conservation.

*“Koala population viability within the Morton Bay Region will be maintained and improved.”*

The Draft Plan does not provide any firmly based policies with sound scientifically based strategy underlying the above which is a vision – not a plan. Also absent is any scientifically based assessment of whether the plan is succeeding or failing in its vision. The Draft Plan for Koala management is loose to the point of irresponsibility in the way council intends to manage one of our key iconic species.

And in the absence of any policy commitment the other strategic outcomes for the environment also look rather hollow and unlikely to succeed as described below:

3.4.1 Strategic Outcome – Biodiversity conservation

*“Biodiversity and associated ecosystem services of the Moreton Bay Region will be protected, managed and enhanced, and resilience of ecosystems to the impacts of climate change and other environmental challenges will be maximised.”*

What possible justification is there for council’s assertions that Biodiversity and associated ecosystems will be protected and enhanced if there is no baseline data on current condition and extent, no monitoring of change, no independent audit, assessment or reporting of success against these stated objectives? These are not policies – these are no more than wish lists and blue sky visions which have little to no chance of success in the absence of the essential scientific rigour outlined above.

3.4.3 Strategic Outcomes- Coastal management

*“...coastal features and processes will be maintained and enhanced.”*

Without clear policies how can such statements possibly be justified?

3.4.4 Strategic outcomes – Regional landscape areas

*“Healthy, diverse and productive rural and coastal landscapes are maintained and enhanced, for multiple environmental, recreational, cultural, economic and scenic amenity values.”*

These are all admirable visions, but no basis for expectation of their successful delivery has been provided within the Draft Plan.

## Trees vegetation habitat and wildlife on private land

There does not appear to be anything in the Draft Plan that addresses the following:

- Longstanding, overzealous clearing and trimming of vegetation in streetscapes, parks, reserves, coastal areas etc often with resultant sea or other scenic views for an appreciative recipient. Complaints about these sorts of practices where they have resulted in replanting have led to failures due to practices including inappropriate vegetation selection and maintenance, and failure to apply penalties or negative incentives such as hoardings which are employed by other councils.
- Promoting the protection of iconic trees on private and public land by means of a register, public education and awareness programs.
- There is concern that programs such as Backyards for Wildlife and Land for Wildlife have been allowed to languish and lack the necessary support – staff resources etc. Similarly for other critically important programs which provide involvement of the community in co-operation with Council in reversing the unsustainable loss of vegetation in the region like e.g. Bushcare.

**Robert Ian Bell for Moreton Bay Eco-Alliance**



**13 August 2014**

ENDS

*“The greatness of a nation and its moral progress can be judged by the way its animals are treated.”* MAHATMA GANDHI



*Ultimately it's about the culture we promote within the region.*