

Referrals

Environment Assessment Branch  
Department of the Environment  
GPO Box 787  
Canberra ACT 2601

To whom it may concern,

We are writing to express my concern in regards to the following referral:

- ✦ Reference Number: 2018/8225:
- ✦ EPBC Case Title: WALKER GROUP HOLDINGS PTY LIMITED/Tourism and Recreation/Numerous lots/Queensland/Toondah Harbour Development, Moreton Bay, QLD, Ramsar wetlands, migratory species and threatened species.

The National Trust of Australia (Queensland) [the Trust] has recently established a Branch in the City of Redland, known to most as the Redlands. The members of the new Branch resolved to make a submission regarding the recent referral under the *EPBC Act* concerning the development known as the Toondah Harbour PDA (as described above).

The Trust is a not for profit, member based charity representing the interest of 14,000 members across Queensland. Our mission is to protect, conserve and celebrate Queensland's environmental, built and cultural heritage.



The plans for Toondah Harbour impact on the harbour's environmental, built and cultural heritage. The National Trust Redlands Branch strongly feels that the plans are not in the interests of the community. The Branch is concerned that the Toondah proposal does not adequately reflect on the full and combined heritage values of the site.

## Ramsar

The proponent acknowledges this proposal will have negative impacts on three Matters of National Environmental Significance protected under the *EPBC Act*, namely:

- ✦ A wetland of international importance;
- ✦ A listed threatened species; and
- ✦ A migratory species.

However, the Trust considers that the impacts on the cultural and environmental heritage of the site are not adequately addressed in the proposal and that the level of impact is unacceptable. The international obligations attached to the Ramsar designation and the international wader bird agreements (CAMBA, JAMBA and ROKWBA) are clear matters of cultural heritage significance and are a statement of the harbour's significance at the national level.

As we understand Australia, as a contracting party to the Ramsar Convention, has an international obligation to protect Ramsar-listed wetlands. We also understand a reduction of a Ramsar site's area can only take place if the change is urgent and in the national interest. The National Trust feels that the proposal, a private sector real estate development, does not either of these criteria. We look forward to how these criteria might be fair and reasonably addressed (if indeed they can).



As it stands the development intends to reclaim part of a Ramsar site and should be declared an 'unacceptable action' under the *EPBC Act*.

## **Koalas**

Koalas are an important icon in the identity of the Redlands area. Further, the area around Toondah Harbour is noted to contain an active and healthy koala population.

Likely impacts from the proposed works will stem from construction disturbance and the ongoing impacts of traffic and human activity (including an increase in the area's dog population) resulting from up to 3,600 new dwellings. The koala is held in such high regard that its standing is beyond the conservation value normally attached to a species. Loss of koalas in the locality would seriously damage the cultural amenity of the area and by all measures should be avoided.

## **Built Environment**

The Toondah Harbour PDA development abuts (and includes part) of the locally important heritage precinct of Cleveland. A number of the historic buildings in the immediate area are significant historic places. While the curtilage of the PDA designation only encompasses one of these buildings, the impacts of the PDA on the setting of the adjoining heritage places is not acceptable. It would include the domination of the existing heritage precinct by new buildings at a scale and mass that will overshadow the existing heritage fabric. There is no indication that the urban design aspects of the PDA have factored in any consideration of the historic built environment of the area.



Further, the PDA includes a monument to the landing by Governor Gipps (at the time the NSW Governor) on his voyage to establish a capital for the fledgling colony of Queensland. This historic event is overlooked in the documentation submitted to date. The landing site clearly has significant cultural significance that should be protected and should inform the PDA planning.

Thank you for consideration and we look forward to your response.

Jane Alexander – Senior Advisor – Heritage Advocacy

On behalf of Redlands Branch – National Trust of Australia (Queensland)

