

Environmental Submission writing kit for the Draft Logan Planning Scheme

(due: deadline 5 pm Wednesday 30 April)

Do not include attachments (which would have to be digitally signed) unless you need to

Submissions must be properly-made for Council to consider your feedback. A properly made submission means:

- **You must include the full name and address of each person making the submission**
- **Submissions must state the grounds for the submission and the facts or circumstances to support the grounds. See text in red below**

Apart from email submissions (preferred) written submissions - posted letters or email attachments, but NOT emails, must be signed by each person making the submission

So the simplest and best option for submissions is to direct email draftplanningscheme@logan.qld.gov.au

Submissions can also be made Via post to Logan City Council, PO Box 3226, Logan City DC, Qld 4114, but have to arrive by 5 pm Wednesday 30 April

See suggested text (in red) for your environmental submission to the Draft Logan Planning Scheme starting next page

1. Koala mapping not included as statutory overlay in Draft Planning Scheme

Background: While out of date mapping of Koala habitat does appear in the Draft Planning Scheme, this is not legally supported mapping (ie not statutory) and therefore has little chance of being defended in a court challenge.

This is because, while the Draft Logan Planning Scheme (DLPS) must adhere to the State Government's 'Single State Planning Policy (SPP)', there is no requirement in this for the Council to incorporate statutory Koala mapping in the planning scheme.

Therefore there is no legal support in the planning scheme for the protection of koalas in the DLPS. This again underscores how hollow the State Government's concerns are for protecting the environment – where they say they will 'protect' but then provide legislation which is toothless. However, by putting a comment on this into your submission you help send a strong message to both Council and the State Government that the community wants stronger legal protection for Koalas and their habitat in Queensland.

What you can write: In your email submission, you could copy and paste the text in red below, or say the same things in your own words. (Make sure you include the second part - 'My proposed change to the Draft Logan Planning Scheme')

To whom it may concern,

I make the following comments regarding Koala habitat mapping and protection in the Draft Logan Planning Scheme:

While I acknowledge that the Draft Planning Scheme incorporates extensive non-statutory mapping of Koala habitat across Logan, this fails to provide adequate Koala protection because:

1. It does not legally protect Koalas and their habitat in Logan
2. The main protection for Koalas in the DLPS is provided by the ecological significance mapping which I understand is flawed due to a lack of ground-truthed data and therefore potentially inadequate in many areas of Logan
3. The DLPS has used out-of-date AKF Koala mapping for Logan as the model for its Koala mapping. More up to date mapping is needed.

My proposed change to the Draft Logan Planning Scheme:

I request that Council legally strengthens its koala protection measures in the Draft Logan Planning Scheme by incorporating statutory protections for Koalas through its habitat mapping, and that Council lobbies the Government on my behalf to strengthen State Koala protection laws.

2. Offsetting and the Council's flawed Ecological Significance scoring

Background: So-called 'offsetting' is now a core part of State Government 'environmental' policy. It is emerging as their principle propaganda tool around environment issues in Qld. Yet it is a 'sleight-of-hand' process that results in a net loss of biodiversity each time it occurs. It is a way of soothing concern over development in critically sensitive areas by promising that something will be done in the future to balance (and somehow make acceptable) the loss of crucial wetlands, rainforest, reef etc. The State Government is now so chuffed about the righteousness of this idea that they are even pointing to the possibility of National Parks being 'offset' if a coal miner wants to take them out. The Federal Government supports this too. Five million tonnes of port dredge spoil dumped on the Great Barrier Reef will now be OK because Federal Minister Hunt has said this can offset by reducing the flows of sediment out of the Burdekin River – a vague promise into the future that will more than likely never happen in any real sense. 'Environmental offsets' can more accurately be called 'environmental setbacks'.

Council has devised its own 'offsets' policy based on ecological scores for each property across the Logan landscape. To do this they have created an 'ecological significance' map which assigns ecological values to various ecosystems across Logan. The trouble is most of this was 'desk top' – based on mapped and recorded data that was already 7 or more years old. There is little inclusion of fauna and flora survey data and other knowledge that has been recorded for Logan since 2007. We have found significant flaws, deficiencies and anomalies in the Council's ecological scoring, which will be directly used to calculate the 'cost' of an offset to a developer. As a result, there are potentially many high biodiversity areas in Logan that score very low (therefore cheap to offset) just because amazing new data since 2007 hasn't been included. We cannot support the concept of offsetting and we certainly should not, by omission, give tacit approval to an offset policy that is based on flawed and deficient data.

What you could write about the Draft Logan Planning Scheme's offsets and ecological significance mapping: In your email submission, (making sure you include the second part - 'My proposed changes to the Draft Logan Planning Scheme') you could say something about Council's offsets policy like:

To whom it may concern,

I make the following comments with respect to the Draft Logan Planning Scheme's

Ecological Significance mapping and scoring, and the offsets policy:

1. Most of the Ecological Significance Mapping devised for the DLPS was 'desk top' – based on mapped and recorded data that was already 7 or more years old. There are serious omissions of fauna and flora survey data and other knowledge that has been recorded for Logan since 2007.
2. This incomplete data has been used by Council to create 'ecological scores' for every parcel of land in Logan and this score will be used to set the 'price' for offsetting each potential development site in Logan.
3. As a result, there are potentially many high biodiversity areas in Logan that score very low (therefore cheap to offset) just because significant new data since 2007 hasn't been included.
4. The deficiencies in data informing the ecological scoring system result largely from Council employing the Government (BAMM) model to produce this mapping but not applying the mandatory second stage 'expert panel' process, which would have captured up-to-date data on sites across Logan.
5. I do not support the concept of 'offsetting' because it represents a net loss in biodiversity.

My proposed change to the Draft Logan Planning Scheme:

I request that Council urgently seeks to overcome this flaw in its ecological significance mapping by funding the establishment of an annual 'expert panel' to bring its ecological significance data up to date, and, in further support of this, to fund the employment of an ecologist to carry out ongoing fauna and flora surveys across Logan, to help build a more complete and accurate ecological database for the city to inform its environmental protection policies.

Further, I can't support the offsets concept, which, in spite of the 'spin', always results in a net loss of biodiversity. In this respect I propose that the DLPS drops the concept of 'offsetting' from its policies and instead provides a regulatory regime to ensure that biodiversity is genuinely protected on a proposal by proposal basis, using strong, compliance enforced regulation and independently delivered fauna/flora survey work to hold the ground on our core biodiversity assets across the Logan landscape.

Background: Logan has responsibility for a number of rare and endangered plant and animal species that require attention through the Planning Scheme if they are to survive the next decade on our watch. So it is alarming that the Draft Planning Scheme has only mapped two 'locally significant' threatened plant species (Gossia gonoclada and Melaleuca irbyana), and one ecosystem type (vine forest) as worthy of special consideration under the new Planning Scheme, which will be operative possibly until the mid 2020s.

By then it may be too late to do anything about the vulnerable to extinction *Persicaria elatior*, a flowering plant that is now only recorded in tiny numbers in one site in Logan City and nowhere else in mainland Queensland. And it may be too late to provide tree hollow homes in old growth trees for the Powerful Owl, which helps control flying fox numbers. And the endangered Glossy Black Cockatoo may not find any of its special food trees left anywhere in Logan. And rapid clearing of essential habitat for the endangered Quoll will mean this very special marsupial may needlessly disappear from this part of Australia, on our watch. And of course there is the Koala.

Mapping the location of the essential habitat of these plants and animals across Logan adds another check on reckless clearing of sites critical to the survival of these species. It is not enough for the planning scheme to recognise only two plant species with special mapping - there are a number of other plants and animals that need ongoing layers of protection provided by statutory mapping in the Planning Scheme.

3. Limited locally significant flora and fauna mapping

What you could write about Council's limited mapping of locally significant species: (Make sure you include the second part - 'My proposed change to the Draft Logan Planning Scheme')

To whom it may concern,

I wish to comment on the Draft Logan Planning Scheme's limited mapping of locally significant species:

It is alarming that the Draft Logan Planning Scheme has only mapped two 'locally significant' threatened plant species (*Gossia gonoclada* and *Melaleuca irbyana*), and one ecosystem type (vine forest) as worthy of special consideration under the new Planning Scheme, which will be operative possibly until the mid 2020s.

It is not enough for the planning scheme to recognise only two plant species with special mapping - there are a number of other plants and animals that need ongoing layers of protection provided by statutory mapping in the Planning Scheme.

These include

1. the vulnerable to extinction *Persicaria elatior*, a flowering plant that is now only recorded in tiny numbers in one site in Logan City and nowhere else in mainland Queensland.
2. The Powerful Owl which needs 'old growth' to be protected by mapping because this provides tree hollows for breeding. This species, which helps control flying fox numbers, is listed as Vulnerable to extinction under State legislation.
3. Allocasuarina food trees for the endangered Glossy Black Cockatoo need to be mapped to ensure the continuation of this species in Logan.
4. Without statutory mapping, rapid clearing of essential habitat for the endangered Quoll will mean this very special marsupial may needlessly disappear from this part of Australia, on our watch.
5. And of course there is the Koala – see comments above in 1.

My proposed change to the Draft Logan Planning Scheme: The Planning Scheme needs to include a broader range of locally significant species, both flora and fauna, if it is to play a genuine role in providing protection for the variety of threatened species Logan has a responsibility to protect.