



North Queensland Conservation Council
114 Boundary Street
Railway Estate, Townsville
PO Box 364, Townsville
Qld, 4810
Ph: 61 07 47716226
Mob: 0428 987 535
office@nqcc.org.au
www.nqcc.org.au
ABN: 55 903 033 286

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Submission

Development Application No.: MCU18/0041
Development Address: 812-840 Flinders Highway and 7-11 Heath
 Road, Oak Valley.
Lot Numbers: Lot 2 on RP746655, Lot 1 on RP745584, Lot 1
 on RP733027 and Lot 2 on RP743591,

North Queensland Conservation Council (NQCC) is grateful for the opportunity to comment on this proposed action which has been deemed impact assessable under the Townsville City Council planning scheme. The development application is seeking a Development Permit for Material Change of Use – Undefined Use (Cattle Holding Yards) on land defined as rural zone.

About NQCC

NQCC is a peak organisation in the Statewide environmental movement and the voice for the environment in North Queensland. Established in 1974, NQCC is a not-for-profit incorporated association with a broad mandate to endeavour to protect the “land, waters and atmosphere of the region” and since then has worked continuously on a number of environmental issues of significance to North Queensland and beyond.

Townsville City Plan – the Environment

In this submission, NQCC has analysed the proposed development and whether it measures up against environmental sustainability in the Strategic Framework of the Townsville City Plan. Key environmental sustainability concepts contained in the City Plan include the following:

- Supporting functioning ecological processes
- Maintaining robust and resilient landscapes
- Avoiding habitat loss and fragmentation
- Keeping and enhancing interconnected network of wildlife corridors and habitats
- Minimising edge effects

NQCC is concerned about the impact of this project on the Black-throated Finch, a species of local importance because the Townsville Coastal Plain is one of the last areas of remaining habitat. On this basis, any decision that the Townsville City Council makes in relation to developments that encroaches on the Black-throated Finch habitat, is going to make a noticeable difference. The species is listed as endangered in *Queensland under Nature Conservation Act 1992 (Qld)* and Federally under the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)*.

The proposed development site includes Regional Ecosystem 11.12.9, frequently used by Black-throated finches on the Townsville Coastal Plain and Regional Ecosystems 11.3.25 and 11.3.30, which are listed in the Black-throated Finch Recovery Plan as habitat. The very presence of these vegetation types on the site is important for Black-throated Finches whether they actively use the site at present or may do so in the future. Preserving habitat area and connectivity is about maintaining resilience, concepts refers to in the City Plan. This proposed land use as a cattle holding yard can be expected to have a significant impact on the range of the Black-throated finch. This form of land use will make the proposed site of the cattle holding yards, completely uninhabitable for this species and can expect to cause significant edge effects to the western side of the proposed site which is in the vicinity of the Townsville City Council's open space zoning at Mount Stuart.

The current zoning of the land as 'Rural' and within the 'grazing district' maintains this land as habitat that can be utilized by the Black Throated Finch. By changing the use of this land to a use of higher intensity and that involves clearing habitat, the area and surrounds are no longer of benefit to this species and therefore of no ecological benefit. The City Plan mentions the need to support both ecological and economic activities and by not allowing the material change of use to be approved, both of these values can be maintained at a satisfactory level simultaneously.

All vegetation that can be retained, should be allowed to remain as habitat for Townsville's local populations of the Black-throated Finch and every effort should be made to enhance the quality of existing habitat. A vegetation screen towards the Flinders Highway has been incorporated in the proponent's plans. NQCC would like to see further effort towards enhancing the ecological values of the site, reducing edge effects and specifically, preserving the habitat of the Black-throated Finch.

In the unfortunate event that clearing does proceed, this should be informed by good process for wildlife protection including having wildlife spotters or carers present and not conducting the clearing all at the one time.

Finally, local wildlife surveys should be required of the proponent to ensure that any of the ecological values of the land are monitored directly. The mapping resources provide a good overview of values but these need to be tested against the reality of what is present at the ground level. All efforts should be made to not disadvantage a locally threatened species that forms part of Townsville's identity as an area of significant ecological values.

Prepared by Tarquin Moon, NQCC Campaigns Manager