

11 March 2019

Hon Michael de Brenni
Minister Housing and Public Works, Minister for Digital Technology & Minister for Sport
c/- Department of State Development, Manufacturing, Infrastructure and Planning – Planning Group
PO Box 15009, City East, Qld, 4002.
Emailed to: infrastructuredesignation@dsdmip.qld.gov.au

To whom it may concern,

Submission: Objection to proposal: Ministerial Infrastructure Designation (MID-0518-0279) for permanent use and upgrade of the temporary clay target range at Belmont Shooting Complex

Thank you for the opportunity to comment on the MID for the Belmont Shooting Complex. This submission is made on behalf of the Queensland Conservation Council Inc. (QCC). QCC is the peak environment conservation organisation in Queensland, with some 60-member groups including ten regional councils, as well as thousands of supporters.

The Belmont Shooting Complex is located within 500ha of the Belmont Koala Forest which is a vital Bioregional Biodiversity and Koala Coast Corridor. In its current form, the proposal fails to take into account a range of regional interests listed in the South East Queensland Regional Plan 2017, Shaping SEQ. QCC asks that you reject the application and substantially revise the proposal to avoid and minimise impacts on a number of threatened species residing within the Conservation Zone.

Issues with the Belmont Shooting Complex proposal include:

- The proposal for 5.4ha to be cleared is unnecessary and fails to meet principles within existing policies that aim to protect core biodiversity areas like this site;
- The proposed offsets are not adequate to prevent loss of Koala Habitat forest and any offsets should be a last resort;
- The infrastructure development proposed is non-essential, with the temporary clay target area for the Commonwealth Games and other existing shotgun facilities available; and
- There has been inadequate consultation with the Brisbane City Council, the Department of Environment and Science (DES), and other stakeholders regarding this development and necessary environmental impact assessments.

Clearing should be avoided entirely to adequately protect this vital section of the Koala Coast Corridor. Instead, QCC would like to see a Biodiversity Enhancement Protection and Enhancement Plan developed for ongoing management of the site. QCC wishes to see the proposal amended to address the issues highlighted above.

We also believe, given the site's high conservation value with a number of resident threatened species, that the forested sections not in use for sporting activities should be listed as a Nature Refuge under the *Nature Conservation Act 1992*.

If future generations are to experience the unique wildlife in South East Queensland's backyard, we must prioritise the protection of Koala Habitat forest from encroaching development.

Should you wish to discuss any aspect of this submission or contact us, please phone 07 3846 7833 or email admin@qldconservation.org.au.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Lisa Cliff', with a stylized, cursive script.

Lisa Cliff

Project Coordinator, Greater Brisbane Region
Queensland Conservation Council
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