

Hon. Jarrod Bleijie MP

Deputy Premier of Queensland, Minister for State Development, Infrastructure and Planning

Email: ministerialcallin@dsdip.qld.gov.au

PO Box 15009, CITY EAST, QLD, 4002

CC: Pradesh Ramiah, Manager South East Queensland (South)
Department of State Development, Infrastructure and Planning

Email: [REDACTED]

CC: Ben Klaassen, Deputy Director-General
QPWS, Department of Environment, Tourism, Science and Innovation

Email: [REDACTED]

CC: Catherine George, Manager - Koala Policy and Oversight, DETSI

Email: [REDACTED]

CC: Premier Crisafulli

Email: premier@ministerial.qld.gov.au

CC: Senator the Hon Murray Watt, Minister for the Environment and Water

Email: senator.watt@aph.gov.au

RE: Coomera koalas survival depend on Ministerial decision on Dreamworld's proposed expansion for tourism

Dear Hon. Jarrod Bleijie, Deputy Premier, Minister for State Development, Infrastructure and Planning,

Gecko Environment Council and Coomera Conservation Group write with our grave concerns at this point of your consideration of the application to expand Dreamworld's footprint by clearing 42,285sqm of koala habitat.

The remaining fragments of habitat in Coomera, including a small number of sites with significant habitat which support source populations, are critical for persistence of local endangered koalas.

As a called-in assessment the community no longer has rights to object or appeal a decision. Our members, with the strong support from the local community, urge us to highlight Minister that all evidence demonstrates that clearing this koala habitat will result in accelerating local koala extinction.

A 2026 study by Endeavor Veterinary Ecology (EVE), commissioned by and available from COGC, investigated a directly adjacent project site covering Coomera urban landscape (Figure 1), and assessed that koalas in this location are highly susceptible to any further habitat loss. In a meeting of stakeholders including CCG and Gecko, we were advised that remnant urban habitat is critical for their survival - future clearing of any habitat in the study site was highly likely to have a significant impact on koalas.

A 2023 Biolink¹ assessment of East Coomera-Pimpama koalas reported a rising mortality rate due to cumulative threats. However, this population persists – and has survived through the past 10 years of rapid urban development and habitat loss and fragmentation. The experts also demonstrate that recovery

¹ Biolink. (2023). Coomera-Pimpama Koala study 2023. Report to the City of Gold Coast Council by Biolink Ecological Consultants, Pottsville, NSW. [Accessible here](#)

is possible – based on science and best practice conservation - with habitat protection and enhancement, landscape permeability measures and threat mitigation interventions.

The recommendations are clear: To protect endangered koalas in Coomera requires concerted efforts to enhance the quality, extent, and connectivity of koala habitat.

Significant impacts require Environmental Protection and Biodiversity Act assessment

Minister Bleijie, since this proposal was first made our groups have called for the project to be referred for independent federal assessment under the EPBC Act. However, as a Ministerial Call-in and under bilateral agreements with the Commonwealth, the community is disappointed that EPBC assessment of the significant impacts to Matters of National Environmental Significance will no longer occur, with the proposal only assessed by SARA and a decision made by the QLD Planning Minister.

Failure to demonstrate avoidance and alternatives:

The proposal to clear core koala habitat under this proposal has **unacceptable impacts on the endangered koalas in Coomera.**

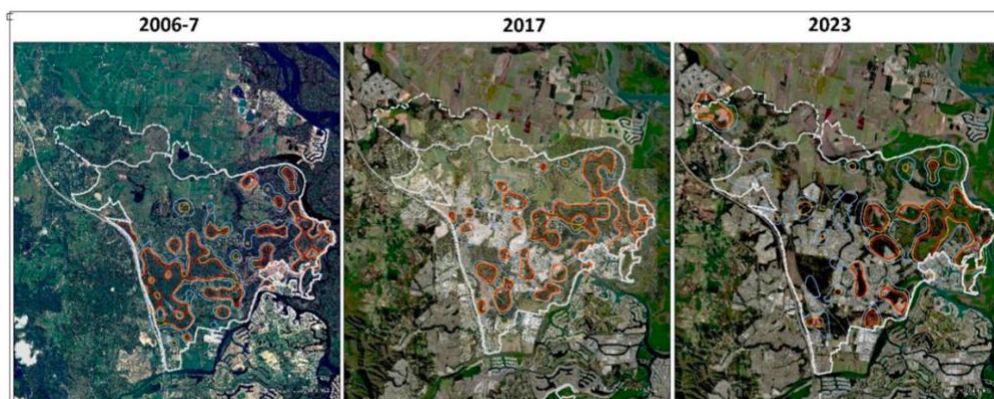
Coomera Conservation Group (CCG) and Gecko Environment Council (Gecko) recommend that the project is referred, assessed, and ultimately delivered with variations to avoid impacts as a controlled action under the EPBC Act.

Best-practice mitigation hierarchies require avoidance of impacts to endangered species habitat as the first and highest priority. It has not been demonstrated that reasonable alternatives have been fully exhausted. Where expert advice identifies a real risk of local extinction, offsets and post-impact mitigation measures cannot be relied upon to deliver meaningful conservation outcomes and are inconsistent with contemporary conservation science.

Cumulative impacts and precedent risk:

This proposal must also be considered in the context of cumulative impacts and the precedent it sets for future development decisions across South East Queensland. The incremental loss of remnant habitat has been the primary driver of koala decline in urban landscapes, and each additional approval further erodes the viability of remaining populations. Approval of clearing in a known koala refuge, despite expert evidence of extinction risk, would establish a dangerous benchmark for similar proposals and undermine the intent of regional and state planning frameworks designed to halt biodiversity loss.

Most concerning is that this project would clear known koala habitat, in an area where our remaining wild koalas are already fighting to survive. Northern Gold Coast koalas are now confined to shrinking patches of bushland, boxed in by roads, fences, and housing estates. Every corridor and fragment of remaining habitat that connects them matters.



In the Coomera-Pimpama koala population study 2023, Biolink authors state:

“A coordinated approach to securing and restoring koala habitat and managing the anthropogenic drivers of koala mortality is required to support the Coomera-Pimpama koala population as ongoing urbanisation condenses the remaining population in rural and conservation lands in the east.”

Current reduction in habitat clearly shows unsustainable mortality rates, or worsening trends in population viability in multiple scenarios. Conversely, and demonstrated with peer-reviewed modelling, **an ambitious program of revegetation and habitat consolidation would reduce incidental mortality rates by reducing threats and disturbances to resident koalas.**

CCG’s Ms Waterman says, “Our community has worked tirelessly for years to protect local koalas and green corridors. We will continue to speak up - because our koalas cannot.”

Representation in relation to State interests and the Regional Plan

We understand that under this called-in assessment the Minister will have regard to State planning instruments which protect or give effect to State interests, as (1) State planning policy or (2) a regional plan, in this instance the SEQ Regional Plan.

On reading the documentation now publicly available, including the Environmental Assessment, Fauna management plan, and Koala management plan CCG and Gecko submit the following representation in relation to State interests of Biodiversity and Tourism as identified in the State Planning Policy (SPP), and also advanced in the ShapingSEQ 2023.

➤ Under the theme of **Environment and heritage** in the SPP:

- the State interest of **Biodiversity**

➤ And under the ShapingSEQ 2023 theme of **Sustain**:

SEQ is one of the most biodiverse regions in the world, with rich natural and cultural landscapes that support community wellbeing, tourism, and First Nations identity. Protecting these assets while building resilience to climate change and natural hazards is essential for a sustainable future.

- **Biodiversity** – The regional biodiversity network and Matters of State Environmental Significance (MSES) are protected and enhanced to support the natural environment and contribute to a sustainable region. ShapingSEQ 2023 seeks to avoid fragmentation of regional biodiversity corridors and rehabilitate degraded areas to maintain habitat and support fauna movement.
- **Koala Conservation** – ShapingSEQ 2023 seeks to protect and connect koala habitat, particularly within and between koala priority areas to support viable koala populations that are distributed widely across SEQ in rural, rural residential **and urban landscapes**. It also seeks to plan development and infrastructure to avoid koala habitat areas, in particular those within koala priority areas, and ensure habitat connectivity for long-term viable populations.

It is evident through documentation and existing data that the proposed tourism expansion will directly and significantly impact biodiversity values, MLES, MSES and MNES. The proposed clearing will have **Significant Residual Impacts** for MNES and MSES and is a prescribed activity in the Nature Conservation Act and Environment Protection Act, Section 6.

- Threatened flora and fauna and endangered koalas, identified in the EA.
- 42,285sqm of koala habitat subject to clearing.
- The site’s ecological function as one remaining pocket of habitat in an urban matrix where threatened species are subject to multiple pressures and compounding threats. Small, isolated patches of habitat are vital for the persistence of koalas in this location.

- Permanent loss of habitat in the regional landscape given the impact is deemed unavoidable and offsets cannot reasonably achieve a local net-gain/no net loss.
- Increasing hazards to wildlife in an existing vehicle strike hot spot area.
- The proposed development contravenes the intent of the Regional Plan Shaping SEQ 2023: 3.2 Plan development and infrastructure to avoid koala habitat areas, in particular those within koala priority areas, and ensure habitat connectivity for long-term viable populations.

The development will also practically undermine Commonwealth, State and Local government and cross-sector stakeholder initiatives for strategic restoration, conservation, and threatened species recovery including the State's Koala Conservation Strategy and the City's priority species initiatives, high risk koala project and Urban Koala Response Group.

- Under the theme of **Economic growth** in the SPP:
 - the State interest of **Tourism**

Commercial tourism should not justify clearing critical koala habitat. The irony that this development would be for tourism and to potentially showcase our local wildlife, is not lost on the public. It is evident that a proposed Dreamworld expansion comes at a direct cost to wildlife and habitat and does not meet the test that 'cultural and natural values underpinning tourism developments are protected.'

The Minister's decision on this proposal will provide a strong signal with long-term economic and reputational considerations.

Koalas are not only an environmental asset but a defining element of Queensland's identity, liveability and long-term tourism appeal. Short-term commercial gains achieved through habitat destruction risk undermining the very natural values that underpin sustainable tourism and regional prosperity. Protecting remaining koala populations is therefore not in conflict with economic objectives, but essential to safeguarding them.

Additional Planning and Legislative Considerations

1. Fauna Management Plan and Koala Management Plan

1.1 Consultation with wildlife rescue and rehabilitation sector

If the proposal is approved, the proponent and engaged fauna spotter catchers must engage early with the wildlife rescue and rehabilitation sector to consult and inform of clearing plans and timing.

1.2 Fauna movement systems

Koala exclusion fencing must be in place informed by specific landscape permeability in this area, including vehicle hot spots. The proponents must be required to liaise with COGC Road Ecologist Josie Stokes and Priority Species team regarding these specific local considerations.

Agencies DSDIP, DTMR, DETSI, COGC must be required to liaise regarding fauna movement in the East Coomera-Pimpama area where koalas are at high risk of local extinction without concerted interventions, including strategic fauna movement systems and optimising koala sensitive design.

2. Inconsistency with nature-positive commitments

Approval of this proposal would be fundamentally inconsistent with stated Commonwealth, State and local government commitments to nature-positive outcomes, threatened species recovery and halting biodiversity decline. Permanent clearing of known koala habitat for commercial tourism expansion cannot be reconciled with these objectives, particularly in a region where koala populations are already critically constrained and heavily managed to prevent further losses.

3. Adverse impacts on local koala threat mitigation initiatives

Threat mitigation activities in this specific local area are being co-designed and implemented by a multi-stakeholder Urban Koala Response Group led by the City of Gold Coast, together with initiatives of the City's Koala Conservation Strategy (2023-2028) and QLD Government's Koala Conservation Strategy (2020-2025). Over the past decades, with the most recent funding from the QLD Government just announced, Coomera koala community stewardship projects have actively supported the management of these koalas, with many individuals known by name.

4. Disparity of Core habitat mapping

The recent assessment of a directly adjacent project site in Coomera by EVE revealed a clear disparity between state mapped core habitat and actual habitat for koalas and their presence. Avoidance of impact to this endangered species and their effective conservation requires localised, functional koala habitat mapping and rigorous independent EAs.

5. Community trust and governance responsibility

Local communities, volunteers and multiple levels of government have invested significant effort and public funding into koala conservation in Coomera over many years. A decision that sanctions further habitat loss in this context risks eroding public trust in planning and environmental governance and undermining confidence in existing conservation strategies.

Thank you for considering our representation on the significant environmental impacts of this proposed ecotourism development.

Yours Sincerely,



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