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11 February 2026

**To:** Mark Stephens – Senior Development Officer Stockland

**Email:** [aurasouthinfo@stockland.com.au](mailto:aurasouthinfo@stockland.com.au)

Dear Mark

**Re: Response to Aura South Public Environment Report (PER) Chapter 11 Impact Assessment Submission**

**Ref:** Aura South Public Environment Report (PER) EPBC 2023/09548 January 2026

The Organisation Sunshine Coast Association of Residents Inc. (OSCAR) appreciates the opportunity to make a submission to the Aura South PER. In July 2023, OSCAR made a submission to the then Queensland State Government on this development proposal by Stockland Developments P/L. as part of the South East Queensland Regional Plan 2023 consultation.

We acknowledge the detailed PER developed by Stockland and their placing paper copies at Key locations on the Sunshine Coast where community members COULD read the full suite of documents.

This submission to the current EPBC referral comments relate to one component of the PER, the ***Litoria olongburensis (Wallum Sedge frog)***. OSCAR maintains as we did in 2023 that the frog management plan if implemented could lead to the demise of the species in this catchment in the long term.

## PREAMBLE

The Organisation Sunshine Coast Association of Residents Inc. (OSCAR) is a non-partisan, not-for-profit umbrella/peak organisation covering resident and community organisations on the Sunshine Coast and Noosa Local Government Areas (LGAs) in South East Queensland. These organisations are united by their determination that the Sunshine Coast and Noosa Planning Schemes serve the public interest.

OSCAR currently has over 36 member groups from the Pumicestone Passage to Noosa and from the Coast to the hinterland and ranges, with these organisations having collectively over several thousand engaged and community-minded members.

The OSCAR overarching **Vision** states: *“The residents of this region enjoy being part of a connected and engaged community living in an area of outstanding natural beauty. **They recognise that they are custodians of the unique and abundant biodiversity, beaches and green spaces of the region.**”*

## Response to Aura South Public Environment Report Chapter 11 Impact Assessment — Wallum Sedge Frog

Chapter 11 identifies breeding habitat of EPBC listed *Litoria olongburensis* (Wallum Sedge frog) as present within the proposed development area which also includes a dispersal corridor and other non-breeding habitat. The report states (Ch11-page 8) that the development has been designed to “avoid and protect the majority of high-quality breeding habitats as well as non-breeding habitat” and will “deliver long term sustainable habitat and improve the outcome for the species”.

We conclude that rather protecting the local population into the future, the frog management plan if implemented could lead to the demise of the species in this catchment in the long term.

### Background

The report identifies RE 12.2.7 and 12.2.12 as the notable breeding habitat present and Figure 11-5 locates the significant areas largely east of the development site adjacent to Pumicestone Passage. Corridors for frog dispersal extend from these areas to the south-east through the development site to the north-west and to the south of the area allowing frog movement to the adjacent catchments (Figure 11-22).

Additional breeding habitat was identified along the north-west movement corridor and in the approximate middle of the proposal development area connected by a narrow dispersal corridor which also extends west to the adjoining catchment (Figure 11-15).

Development is to remove this central corridor and breeding habitat. The developed plan (chapter 11 page 8) proposes:

- Creation of a larger area of breeding habitat in the eastern Offset Area extending the small area currently present
- Conservation and restoration of a much larger area of non-breeding habitat also to the east towards Pumicestone Passage and
- Protection key movement corridors to the north and west of the Site.

### Breeding habitat requirements

Table 11-4 summarises requirements for wallum sedge frog habitat as:

- Specific vegetation
- pH <6, but preferably <5.
- Conductivity <200 $\mu$ S/cm.
- Average depth of WSF ponds between 5–67cm.

In addition, further constraints are listed on chapter 11-page 123 including:

- Ensure all stormwater, treated or otherwise, does not enter habitat either directly or indirectly and
- Be cognisant that in times of high rainfall, creek waters may enter created WSF habitat. Design should make allowance for this.

Multiple references are made to the “learnings” from the nearby Aura development. The Twin Waters West development further north was proposed after Aura by the same developer and supported by ecological studies from the same consulting group. A freshwater wetland being an EPBC listed community and a breeding ground of acid frogs amongst others was present. The management plan was to protect the wetland in situ. Controls for Twin Waters West included:

- isolation of the wetland from surface flows up to and above the 39% AEP and 10% AEP flood flows
- replacing surface flow with urban stormwater treated to stormwater standards injected into the groundwater
- the groundwater injection aimed to delay salinisation of the groundwater of the wetland from the proposed adjoining constructed saline waterbody; their modelling indicated groundwater salinity would only increase to between 1040 and 4160  $\mu$ S/cm over a ten year period weather dependent

- pH of surface and seepage waters to the wetland and injected stormwater would be > 6.0 to 8.4.

### **Threats to breeding habitats**

The report reviews threats to breeding habitat including poor prior and current land use. The report makes reference on three occasions to climate change and includes controls to mitigate such effects through “drains, bunds and potentially water level control valves (i.e. aid in climate change scenario)” (chapter 11- page 124).

In spite of this, the report does not present even a basic threat assessment. Council flood mapping (all flooding) is presented in Figure 11-29 but a coastal hazard assessment was not included. A simple exercise is depicted in Figures 1 and 2 below where council coastal risks are superimposed on Figure 11-25 of the report. As should be widely recognised, failure to limit emissions in line with objectives of the Paris Agreement has resulted in climate projections to 2100 are no longer end points but a stepping stone to even greater impacts.

Council mapping clearly identifies the Offset Area and areas to the east as subject to storm tide inundation but more importantly, a westward progression of the tidal zone of the Pumicestone Passage into the Offset Area will also occur.

The Offset Area clearly does not provide “long term sustainable habitat” as proposed.

Current breeding areas further east are likely to be lost first with frog retreat to the west along the identified dispersal corridors. Enlargement of breeding areas in the eastern Offset Area as proposed would provide short to medium relief. It is notable the injection of urban stormwater to delay salinisation of the groundwater in the offset area as to be implemented at Twin Waters West has not been proposed here either because there is a lack of confidence of it working for any significant period of time, or, it simply reflects the failure to fully review hazards to the wallum sedge frog in this area.

The southern dispersal corridor may or may not be impacted; relevant information is not provided though we consider it likely. The north-west and central corridors take on a greater important role as does the breeding areas. Ironically, the corridor and breeding areas to be lost by the development are some of the most resilient in the long term.

Rather than providing long term sustainable habitat, the management plan in fact proposes the destruction of the best future habitat and possibly the only connection to the adjoining catchment to the west.

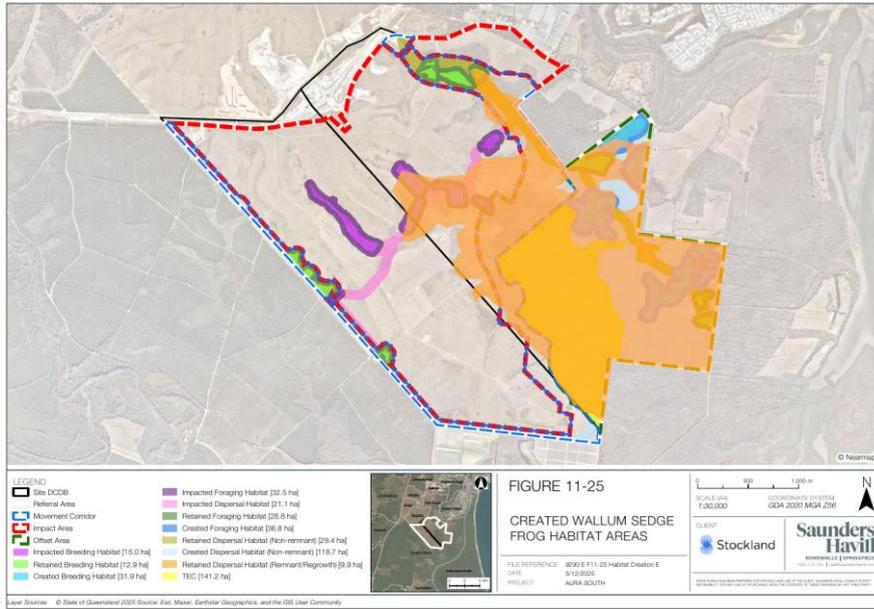


Figure 11-25: Created WSF Habitat

Figure 1: Council mapping<sup>1</sup> of storm tide inundation hazard (prior to 2100) shown in orange superimposed over the report Figure 11-25.

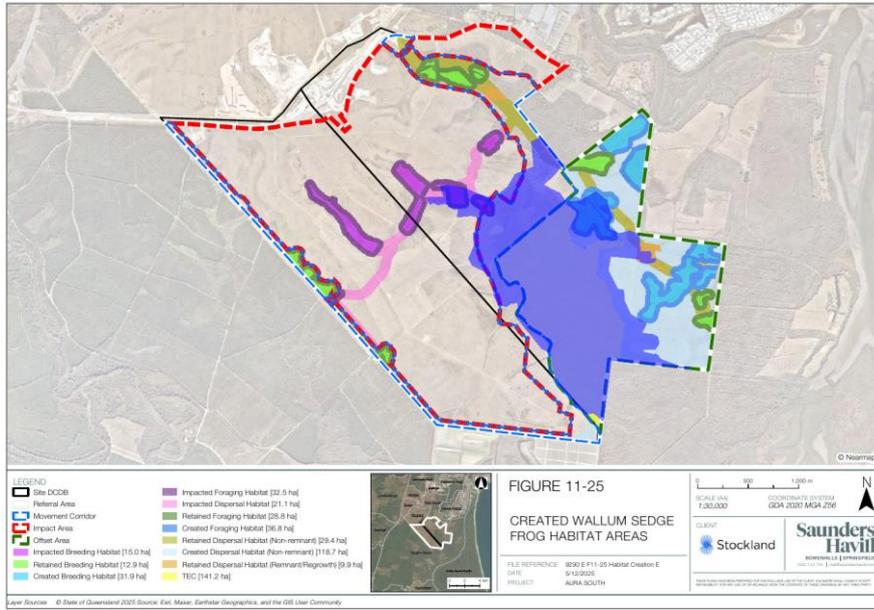


Figure 11-25: Created WSF Habitat

Figure 2: Council mapping of tidal zone (prior to 2100) shown in blue superimposed over the report Figure 11-25.

<sup>1</sup> <https://eplan.sunshinecoast.qld.gov.au/eplan/property/515999.94/455000/7078000/7014000/0/124>

## Recommendations

1. As proposed for Twin Waters West, the central breeding habitats should be protected and enhanced in situ and connected by a Green Network Precinct as proposed for the north west habitats and dispersal corridor. The consultant is confident at being able to deliver constructed breeding habitat. These areas should be located in situ. This recommendation aligns with the State Planning Policy and Sunshine Coast Planning Scheme objective requiring "Development protects known populations and supporting habitat of rare and threatened fauna species, as listed in the State Nature Conservation Act 1992, Nature Conservation (Wildlife) Regulation 2006 and the Commonwealth Environmental Protection and Biodiversity Conservation Act 1999".
2. This Green Network Precinct is to act as a protected dispersal corridor linking to the catchment to the west.
3. Irrespective of where breeding habitat is located, prescriptive key performance indicators (KPI) are to be in place against which on-going performance in terms of animal numbers and population trends can be assessed.
4. In the event of failure to achieve the KPI, remediation works to be undertaken at the failed location or an alternative site.
5. All long term monitoring, maintenance and remediation works if required remain the responsibility of the developer until such time as a long term sustainable population (as is the developer's objective) has been demonstrated to be present when considering ALL significant threats.

Yours sincerely



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