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**REFERENCE NUMBER: 2016/7840**

**TITLE: GAG Lake Street (Cairns) Property Company No.1 Pty Ltd/Tourism and Recreation/Lot 203 on SP 2102321/Queensland/Tourist and residential development, 163 Abbott Street, Cairns**

Douglas Shire Sustainability Group (DSSG) is an incorporated association operating within the Queensland Wet Tropics region, particularly but not exclusively focused on Douglas Shire area. DSSG has existed for over ten years and has a significant membership.

Our objects include “the protection and conservation of the unique environment in the Douglas Shire and its surrounds, including the Great Barrier Reef, the Wet Tropics and World Heritage areas”

Members have drawn our attention to the above referral under the Environment Protection and Biodiversity Conservation Act (EPBC Act) and we make the following submission.

This development proposal is a controlled action because it will have a significant impact on the Spectacled Flying-fox, which is listed as “vulnerable” under the EPBC Act and the Nature Conservation Act (Qld). Spectacled Flying-foxes keep our World Heritage Wet Tropics forests healthy by spreading seeds and pollinating trees.

Spectacled Flying-fox numbers are rapidly declining<sup>1</sup> and destruction of important roost sites pose a direct threat. Roost trees are protected by the Nature Conservation Act (Qld).

This development proposal requires the removal of four significant trees used by this species for birthing.

The four critically important trees on the proposed development land are:

1) A large fig tree on Abbott Street (near the Aplin Street corner);

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<sup>1</sup> Spectacled flying-fox monitoring in the Wet Tropics Region

David A. Westcott<sup>1</sup> and Adam McKeown<sup>1</sup> 1CSIRO Land and Water Flagship, Atherton, Qld

- 2) A large mango tree, situated on Aplin Street towards Lake Street;
- 3) A tamarind tree, situated on the corner of Lake Street and Aplin Street; and
- 4) A Eucalyptus tree (cadaghi) situated adjacent to the fig tree on the corner of Abbott and Aplin Streets.

The Cairns city camp at times supports up to 15,000 Spectacled Flying-foxes<sup>2</sup>. In the past two years the camp has been disturbed by removal of trees and as a consequence these four trees are fundamental to support breeding individuals.

In addition to the loss of trees actually located on the plot, the site is in close proximity to a number of other roost trees which will be impacted during the construction period by noise and cranes etc.

Given the high density nature of the proposed facility, it is likely that the surrounding roost sites will be permanently impacted by activity. The risk of an unplanned dispersal of the Cairns City camp is high, creating further conflict between residents and the camp.

We seek a full Environmental Impact Assessment undertaken by a reputable consultant to fully assess the impact of the proposed development.

Yours sincerely



Laurene Hull  
Secretary

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<sup>2</sup> Up to 15% of the estimated Spectacled Flying-fox population in Australia