



PRELIMINARY DOCUMENTATION INFORMATION PACKAGE



All comments and submissions to:

QRE Pty Ltd
C/- Cardno Qld Pty Ltd
Attention: David Perkins
Locked Bag 4006
Fortitude Valley QLD 4006
Email: david.perkins@cardno.com.au



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1. INTRODUCTION

QRE Pty Ltd seeks to establish an eco-sensitive tourist resort at Black Head, Curtis Island, north-east of Gladstone, Queensland. The site was previously part of a landholding used for cattle grazing. The site comprises 713 hectares of leasehold land (Lot 8 CP860464, Lot 11 CP860464 and an area of Esplanade of approximately 250m² for barge landing and access at Hobble Gully), with the resort concentrated on approximately 20 hectares of land. The proposed Turtle Street Beach Resort includes 187 units, resort amenities (beach centre, pools and tennis courts) and a central facility with a reception, conference facilities, shop, bar and restaurant. A water supply dam and an airstrip are also proposed.

Following referral to the Commonwealth, the project was determined to be a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) requiring an Assessment on Preliminary Documentation. The EPBC Act Preliminary Documentation Referral Number assigned to the action is 2015/7585. The controlling provisions for the action under Part 3 of the EPBC Act are:

- Listed threatened species and communities (sections 18 & 18A);
- Listed migratory species (sections 20 & 20A);
- World Heritage properties (sections 12 & 15A); and
- National Heritage places (sections 15B & 15C).

Members of the public are invited under subsection 95A(3) of the EPBC Act to provide comments in writing on this request.

Comments on this matter are due by close of business on **10 May 2017**. You can send comments:

by email: david.perkins@cardno.com.au

by letter: QRE Pty Ltd
C/- Cardno QLD Pty Ltd
Attention: David Perkins
Locked Bag 4006
Fortitude Valley QLD 4006

2. KEY ASPECTS OF THE PROPOSAL

OVERVIEW

QRE Pty Ltd seeks to establish an eco-sensitive tourist resort at Black Head, Curtis Island, north-east of Gladstone, Queensland. The site was previously part of a landholding used for cattle grazing. The site comprises 713 hectares of leasehold land (Lot 8 CP860464, Lot 11 CP860464 and an area of Esplanade of approximately 250m² for barge landing and access at Hobble Gully), with the resort concentrated on approximately 20 hectares of land (refer to site map – Include attachment as hyperlink).

The proposed Turtle Street Beach Resort includes 187 units, resort amenities (beach centre, pools and tennis courts) and a central facility with a reception, conference facilities, shop, bar and restaurant represents 0.0006% of the original holding with only a very small area to be physically developed for tourism accommodation and recreation facilities with the majority of the lease area being left in its natural state. The proposed action is consistent with the current Gladstone Regional Council Planning Scheme (commenced on 12/10/2015) which includes Lot 8 on CP860464 in the Major Tourism Zone.

QRE Pty Ltd has worked with the State and Local Government and has secured development approvals for an eco-sensitive tourist resort on the site. The following represents the approved plan of the resort at Black Head (in accordance with the Final Court Order dated 28 September 2016). Not shown on this plan is a barge landing on Hobble Gully, the proposed nearby water supply dam, and a proposed airstrip.

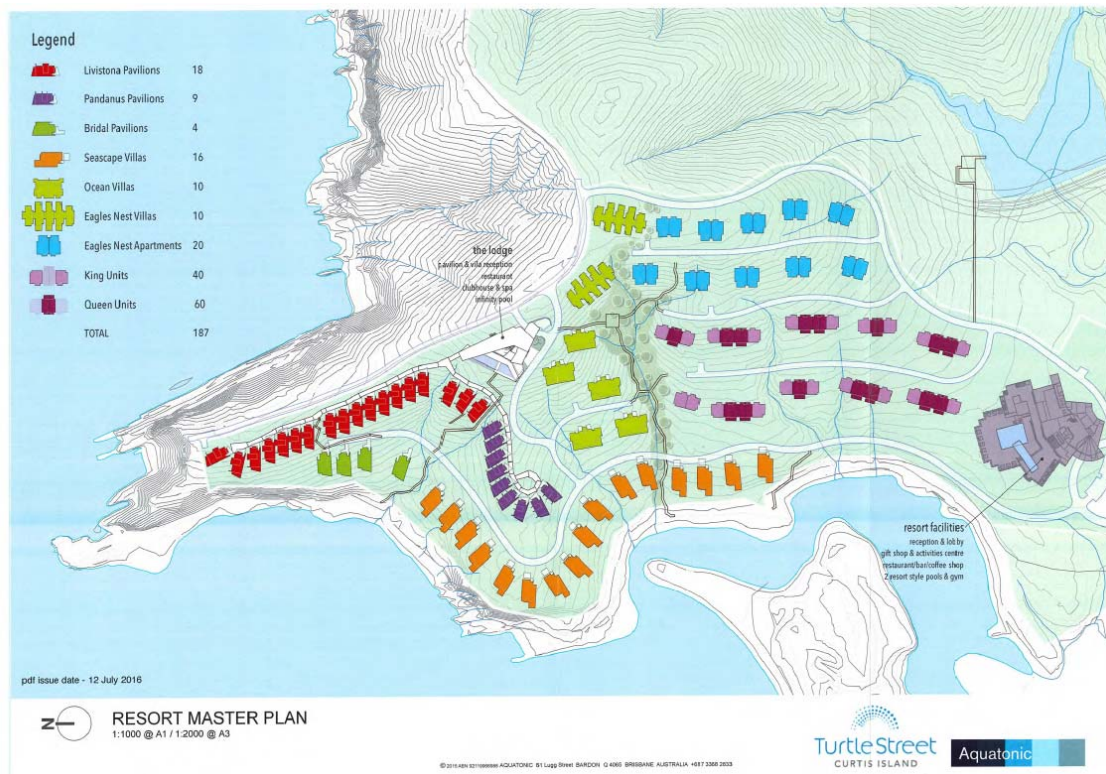


Figure 1: Approved plan in accordance with Final Court Order dated 28 September 2016 (excluding dam and airstrip).



ACCOMMODATION FACILITIES

The proposed Turtle Street Beach Resort incorporates 187 units in a variety of configurations (total of 259 bedrooms), resort amenities (beach centre, pools and tennis courts), and a central pavilion with a reception, conference facilities, shop, bar and restaurant.

ENERGY

A standalone diesel energy system is proposed for the development and will provide a combined genset supply of 1.2 megawatts. QRE Pty Ltd has committed to a path of research and development of renewable energy sources which will most efficiently and effectively contribute to the resort's clean energy aspirations.

WATER SUPPLY

The main water supply will be a new dam located in the infrastructure and access corridor, with a smaller existing dam located in the resort node to serve as a backup supply for emergencies (e.g. fire management). The location and design of the proposed dam will ensure impacts on migratory birds are avoided because it is located in an area largely cleared of woody vegetation and upstream of tidal areas / potential wader bird habitat. Further it will incorporate appropriate wave and erosion protection as to avoid downstream erosion/sedimentation impacts. A small package water treatment plant is proposed to be located in the resort infrastructure area to transform the raw water from the dam to a potable standard.

STORMWATER


Best practice stormwater and drainage design will be implemented to ensure the natural hydrology is not adversely impacted by the proposed development. Conveyance of flows from new areas of development will be done in a way that considers the existing drainage characteristics of the island and receiving environment. New drainage networks will also feature elements to remove sediments and nutrients prior to discharge. Work will be undertaken in accordance with the conditions of the Operational Works approval issued by Council and the Consent Order, including requirements to prepare and implement an Erosion and Sediment Control Plan.

SEWAGE TREATMENT

The wastewater treatment plant will be designed, constructed, operated and maintained to produce a consistent Class A+ recycled water. The recycled water will be monitored to ensure the required water quality prior to irrigation;

WASTE MANAGEMENT

The waste management strategy for the project aims to minimise the total volume of waste produced and the volume of waste disposed to landfill to the mainland (Gladstone Refuse Centre) during construction and operation. All solid wastes that cannot be reused or recycled as described above, will be collected and stored in



designated facilities on the Island, prior to transport and disposal on the mainland. Waste storage facilities throughout the site will be designed to prohibit access to wildlife and/or pest species;

ACCESS

Access to the proposed resort will be via helicopter or plane on a new 1,100 metre airstrip and existing dedicated barge landing points located at Hobble Gully and South End. It is estimated that 35 - 40% of resort guests will arrive by plane or helicopter, with the balance arriving by boats with guests then transferred to the resort using resort vehicles from South End. The use of private vehicles will not be encouraged with only a small percentage of guests anticipated to bring their own vehicle. No vehicle access will be permitted to the foreshore within the resort precinct.

ACTIVITIES

Guests at a resort need to be offered a range of activities in order to ensure that the average stay (aimed at 4 days) is achieved, including Bars; Pools; Conference facilities; Day spa and Tennis courts. Any waterborne activities within the Great Barrier Reef Marine Park BRMPA will be subject to separate permits. Offsite resort generated activities will require Queensland Parks and Wildlife Service permits that will regulate these activities.

SITE REHABILITATION AND LANDSCAPING

Landscape concept plans have been prepared for the proposed development that identify existing trees and additional areas for supplementary planting. All new trees, shrubs and grasses will be from local endemic species and a best practice weed management plan is proposed.

SITE-RESPONSIVE DESIGN

The project has been designed to minimise impacts on the Great Barrier Reef World Heritage Area by ensuring appropriate setback distances to the shoreline and by ensuring that buildings are predominantly below the height of the existing mature trees on the site. The design, colour palette and construction materials of buildings and infrastructure will also complement the natural environment.

The proponent has a long history of environmental stewardship on the Island and has dedicated approximately 32,890 hectares of the original Monte Christo Station to the Queensland Government for National Park and Conservation Park, including a vegetation offset area of 18,950 hectares. A large portion of the 713 hectare site (approximately 517 hectares) is also subject to the provisions of a Nature Refuge Agreement endorsed by the proponent and the State Government. In addition to these measures, in 2015 the proponent also removed all cattle from the Island to assist in ecosystem restoration.

At a policy level the project is consistent with the Queensland Ecotourism Plan 2016 - 2020 and the Gladstone Regional Planning Scheme which includes the site in a Major Tourism Zone.



3. COMPANY PROFILE

QRE Pty Ltd, ABN 74 067 532 601 (QRE), is a company duly incorporated in Australia. QRE Pty Ltd's early history commenced in 1976 when a group of American investors, led by William Reigel, acquired Monte Christo Properties on Curtis Island in Queensland, Australia with the vision of establishing a tourist resort on the former cattle grazing land. Since this time QRE Pty Ltd, now led by Managing Director Tim Reigel, has worked with the State and Local Government and has secured development approvals for an eco-sensitive tourist resort on the site. The company is now seeking approval for the tourist resort under the Commonwealth's Environment Protection and Biodiversity Conservation Act 1999.

QRE Pty Ltd has a proven record of responsible environmental management of Curtis Island. They have surrendered approximately 32,890 hectares of the original Monte Christo holding to the State, including land for National Park, Conservation Park and a vegetation off-set area of 18,950 hectares.

4. PROJECT LOCATION AND SITE DESCRIPTION

LOCATION

The site comprises 713 hectares of leasehold land (Lot 8 60464, Lot 11 CP860464) and an area of esplanade of approximately 250m² for barge landing and access at Hobble Gully, with the resort itself concentrated on a small portion of this total site area, about 20 hectares. The site is surrounded by a National Park to both the north and south. The proposed resort is located within a small portion of the total area of the site which is zoned “Major Tourism” under the Gladstone Regional Council Planning Scheme 2015.

The site is located on the eastern side of Curtis Island with the resort node centred on a coastal headland known as Black Head. Curtis Island is located approximately 20 kilometres north of Gladstone and 40 kilometres south-east of Rockhampton. The Island is separated from the mainland by “The Narrows” which form a protected north-south water course. Significant LNG facilities have been established to the south-west of the site).

The site was originally part of the Monte Christo cattle station, which comprised approximately 33,911 hectares of primarily leasehold land. Lots 8 and 11 on CP860464 are part of the original Monte Christo property over which a tourism special lease exists. Part of the site is subject to Nature Refuge Conservation Agreement.



Figure 2: Aerial view of site.

CURRENT STATE OF THE ENVIRONMENT

The site is considered to be in moderate ecological condition with parts of the site having been previously cleared and used for historic grazing purposes. The Fauna Survey and Habitat Assessment (refer to EPBC Act Referral) found that feral pigs, feral horses (brumbies), wild dogs, feral cats, foxes, and stray stock are the main feral species impacting on conservation values on Curtis Island and these were all detected during the survey. The fox, feral cat, feral dog and in some situations the feral pig are all predatory and have an adverse effect on native fauna. These species may account for the apparent absence of small and medium-sized native fauna species over the site. The black rat is also present, which is likely competing with native rodents.



HYDROLOGY

The hydrology predominantly drains towards the west. Graham Creek is a large mangrove wetland that almost dissects Curtis Island from The Narrows. One unnamed and two named gullies drain into Graham Creek. Hobble Gully, the most northern creek (where the water storage facility is proposed) is a steep-banked ephemeral creek for much of its length within the study area. Outside of the study area it becomes a deep tidal creek. Logbridge Creek is the major drainage creek with steep banks and flows into Graham Creek further to the south. In 2003, an approval was issued by the Department of Primary Industries to clear an area of mangroves (approximately 250m²) to allow for construction of a barge landing area.

SOIL AND VEGETATION CHARACTERISTICS

Geological investigations indicate that the geology at the resort site is dominated by “sandy loam topsoils (being approximately 300mm depth) overlying between 300 and 600mm of shallow gravelly residual sandy soils or duplex soils, with lower silty clay subsoil underlain by hard weathered rock” (McWilliam Consulting Engineers, facsimile transmission 28.11.2002). The northern portions of the headland include exposed areas of greywacke and mudstone or thin soils derived from the metasediments of the Shoalwater Formation. Deeper soils prevail in the more protected parts of the site. These soils give way to a mixture of sandy, rocky and muddy shores on the western edge of the resort site. In the southern flatter parts of the resort site there are deeper soils and exposed rock. The property contains a relatively diverse range of vegetation types, dependent upon topography and proximity to the coastline.

OUTSTANDING NATURAL FEATURES

The principal natural features of the original Monte Christo Station included a highly scenic stretch of shoreline on the island’s east coast, with bluffs and headlands, scalloped bays and beaches, sand dune formations, and an extensive marine plain. The site of the proposed beach resort is located close to ‘Black Head’, a rock promontory with a maximum height of approximately 54 metres. Black Head forms the southern limit of Turtle Street Beach and is the commencement of a 7.5 kilometre stretch of high bluffs. The site contains the prominent features of Black Head and Turtle Street Beach, together with the sea cliffs and native vegetation.

GRADIENT

The topography in the resort is diverse. In its eastern part, the terrain comprises hilly lands with narrow rounded crests on the ridges and spurs, and steep slopes. Although the majority of the site has slopes less than 25% (1 in 4), some steep gullies have been left undisturbed and it is proposed that they will remain as features of the landscaping. The exposed rugged eastern coastal fringe is outside the resort area, largely within an esplanade, and will not be developed.

INDIGENOUS HERITAGE VALUES

A cultural heritage assessment for the development was prepared by ARCHAEO to provide the project with compliance with its cultural heritage duty of care, pursuant to the *Aboriginal Cultural Heritage Act 2003*.

5. MATTERS OF NATIONAL ENVIRONMENTAL SIGNIFICANCE

The following matters of national environmental significance (MNES) for which further information was requested by the Commonwealth are:

- Listed threatened species and communities – Flatback Turtle and Dugong;
- Listed migratory species (sections 20 & 20A);
- World Heritage properties (sections 12 & 15A); and
- National Heritage places (sections 15B & 15C).


The following sections represent a high level summary of the text included in the Preliminary Documentation. Full copies of all the EPBC Act referral and preliminary documentation are available for review on the project website (<http://www.turtlestreet.com.au/>) or can be viewed at the State Library of Queensland and Gladstone City Library.



Figure 3: Aerial view of site.

FLATBACK TURTLES

The Flatback Turtle (*Natator depressus*) is one of seven species of sea turtle worldwide and the only species endemic to the waters of Australia and Papua New Guinea. All nesting beaches of this species occur in Australia. It is listed as migratory and vulnerable to extinction under the *Environment Protection and Biodiversity Conservation Act 1999* and the *Nature Conservation Act 1992* (Queensland). Species listed as vulnerable may become endangered if threats continue. Under the *Reef 2050 Long-term Sustainability Plan*, sea turtles are considered as indicator species to protect the Outstanding Universal Value of the Great Barrier Reef (GBR) world heritage area. There is a commitment from both the Australian Government, and the Great Barrier Reef Marine



Park Authority (GBRMPA) to identify, protect and manage key marine turtle nesting and foraging areas within the GBR world heritage area. The objective is to have populations stable or increasing. The first five years of this plan have a specific focus on the flatback turtle.

No areas on or adjacent to the resort site are considered to be ‘important habitat’ for flatback turtles under the definitions stipulated in the *Matters of National Environmental Significance Significant Impact Guidelines v1.1*. Very low density nesting, in the order of possibly one to two turtle nesting events per season, may intermittently occur on the beach to the north of Turtle Street Beach Resort, and any impact to the flatback turtle population from the resort footprint is not significant. Notwithstanding this, measures have been taken to avoid any potential impact from the construction and operation of the resort on the nesting opportunities that may take place here or elsewhere on Curtis Island including ‘turtle friendly’ lighting design and guidelines for construction, restricted access to the foreshore and development that is setback behind a 10 m esplanade populated by a screening of mature vegetation 6 to 10 m in height

Effective design and management strategies associated with the proposal are in place to ensure this, including ‘turtle friendly’ lighting design, a development setback from the foreshore allowing a screening of mature vegetation in front of the resort and access restricted to three pedestrian-only access points onto the adjacent beach. Protocols are also in place restricting vessel speeds through Graham Creek to manage any adverse effects to inter-nesting or foraging flatback turtles that may occur here. The proposed lighting design includes:

- Place lights in shielded, downward directed turtle friendly fixtures;
- Use vegetation for filtering;
- Use low wattage/low intensity lamps and/or dimmer lights that have a maximum illuminance pre-set;
- Use timers, motion-sensors and wall card slots where appropriate to reduce unnecessary light;
- Light fittings to be asymmetrical where needed, to direct any light away from the beachfront;
- Design interior lighting such that light falls substantially within the building and not through the window;
- Apply window tint at a 15% light transmittance level or close opaque curtains or blinds after dark to reduce interior light spillage;
- Eliminate short wavelength light;
- Use light of specific wavelengths (red or amber LED bulbs are less disruptive to nesting sea turtles and hatchlings). Low-pressure sodium lamps with low illuminance can be considered. Sea turtles are less attracted to long wavelength light, however reducing the overall intensity of the light is of primary importance;
- Consider use of red light for emergency signage or security lighting, particularly when close to or visible from the beach;
- Use low mounted lights;
- Lights with a full cut off so that no light extends above 90 degrees; and
- Avoid decorative or uplights during the nesting & hatchling season.

DUGONGS

The dugong (*Dugong dugong*) is nationally listed as migratory under the *Environment Protection and Biodiversity Conservation Act 1999* and as vulnerable in Queensland (*Nature Conservation Act 1992*). As a species of conservation concern it is also targeted as one of the indicators of biodiversity health under the *Reef 2050 Long-Term Sustainability Plan*, which has a commitment to:

- Continue to protect and manage key habitats for dugong; and
- Implement further actions to reduce human-related causes of dugong mortality such as vessel strike and net entanglement.

The distribution of this species spans coastal waters of the Indo-West Pacific from East Africa to Vanuatu with some of the highest population numbers found in the tropical and subtropical waters of Australia, particularly in the Torres Strait region (Marsh *et al.*, 2002).

Seagrass meadows in the Gladstone area and south to Rodds bay are considered to be of regional significance to dugongs as they are the only known major seagrass habitats between Shoalwater Bay and Hervey Bay; where high numbers of dugongs exist (Thomas *et al.* 2010). As such, this area is likely to provide an important connecting habitat along the southern Queensland coast (Sobtzick *et al.* 2013). Approximately 50 km of coastline extending from the bottom of Curtis Island to Rodds Bay has been established as the Rodds Bay Dugong Sanctuary under the *Fisheries Act 1994* (refer to <http://www.gbrmpa.gov.au/zoning-permits-and-plans/special-management-areas>). This is a Zone B (restricted use) Dugong Protected Area (DPA). These protected areas are designated as a two-tiered management system to conserve a network of dugong habitat. Zone A covers areas of the most significant dugong habitat in the southern GBR, while Zone B represents less significant, but still important habitat.

Defining populations of dugongs along the Queensland coastline remains difficult. Genetic studies suggest there may be two discreet populations separating between Moreton Bay and Harvey Bay (Seddon *et al.*, 2014); however, widespread movement patterns along the coastline indicate there is contemporary connectivity right across this region (Zeh *et al.*, 2016). Centres that sustain high numbers of dugongs in southeast Queensland exist in Shoalwater Bay, Harvey Bay, and Moreton Bay. The Gladstone region of the Rodds Bay Dugong Sanctuary sustains a 'relatively small' dugong population (Rasheed *et al.*, 2016).

The proposed development will not likely impact any 'important habitat' for dugongs based on the definition stipulated in the *MNES Significant Impact Guidelines v1.1*. Small patches of seagrass that are 'light in cover' occur along Graham Creek and Hobble Gully and any substantial meadows do not occur in waters adjacent to the site. Effective management is in place to regulate vessels and wastewater treatment and all cattle grazing has ceased by the proponent. Watercraft can pose a risk to dugongs through boat strike and displacement of migratory pathways. Increased vessel activity is expected during the construction and operation of the resort through Gladstone Harbour and along Graham creek and Hobble Gully. Factors that are important to assessing the risk to dugongs from boat traffic include vessel speed and location of dugong habitat in relation to vessel routes. The impact of vessels on dugongs during both construction and operation of the development are anticipated to be minimal and appropriately managed. Any impact to dugongs and their habitat is expected to be a result of the construction or operation of the Turtle Street Beach Resort, and to be avoided and managed as follows:

- All vessels operating during the construction or operation phase of the development will abide by the Port of Gladstone published speed restrictions and exclusion zones set out by all relevant authorities at all times.
- Vessels, such as the barge, accessing the site via Graham Creek and Hobble Gully will maintain the 'no wash' speed restrictions set between Barney's point and Graham Creek to a maximum of 5 knots. These restrictions mitigate the potential for the suspension of sediment into the water. They also impose a 'go slow' speed restriction that is used to manage incidences of boat strike in areas with high densities of dugongs.

THREATENED OR MIGRATORY BIRD SPECIES

The proponent is already committed to avoiding, managing and mitigating potential impacts on the ecology of Curtis Island. The development footprint is fixed and limited to an area that is clear of integral native vegetation. There are no known habitats or important feeding resources for these species within the development footprint, but all may occupy adjacent areas.

Management conditions contained within the agreement relevant to mitigating or managing the impacts on migratory and threatened bird species (noting provisions relating to entry of dogs for stock management are no longer relevant) include:

- Only allowing the entry of dogs under the control of the lessee or persons authorised by the lessee for a sight impaired person;
- Allowing low-key recreational use by authorised residents, visitors or staff including walking, cycling, use of vehicles on established tracks, horse riding, fishing in the dam, and nature based activities;
- Recreational use of vehicles is on formed roads only, maintaining a maximum vehicle speed limit of 60km/h along constructed roadways;
- Allowing the erection of interpretive signs relating to the appreciation of natural values;
- Allowing understated tourism activities consistent with protection and appreciation of the natural values of the nature refuge;
- Native plants including trees, shrubs, and grasses are not interfered with, destroyed, or removed;
- Trees, shrubs and grasses which are planted are indigenous to the nature refuge and derived from local seed stock of the Curtis Coast region;
- No unreasonable acts or inactions occur which may adversely and substantially affect any indigenous flora, or fauna within their related habitats;
- Reasonable measures are taken to prevent the entry of non-indigenous fauna, including domestic and feral animals; and
- Materials are not stored unnecessarily or dumped and timber is not removed.

The project design further limits potential impacts on migratory shorebird bird species by limiting foreshore access to a total of three pedestrian access points from the proposed resort, providing no vehicle access to the foreshore, and utilising topography and landscaping to prevent access to the foreshore other than by means of designated pedestrian access points. These measures will ensure human disturbances of any migratory shorebirds that may utilise the foreshore for roosting or foraging are minimised or avoided.

WORLD HERITAGE PROPERTIES

The Great Barrier Reef's diversity reflects the maturity of the ecosystem which has evolved over thousands of years (Department of the Environment, 2015). Within the Great Barrier Reef, there are some 2,500 individual reefs of varying sizes and shapes, and over 900 islands, ranging from small sandy cays and larger vegetated cays, to large rugged continental islands rising, in one instance, over 1,100 metres above sea level. Collectively these landscapes and seascapes provide some of the most spectacular maritime scenery in the world. The latitudinal and cross-shelf diversity, combined with diversity through the depths of the water column, encompasses a globally unique array of ecological communities, habitats, and species. This diversity of species and habitats, and their interconnectivity, make the GBR one of the richest and most complex natural ecosystems on earth (Department of the Environment, 2014). The proposal will not have an adverse impact on the heritage values of the Great Barrier Reef Marine Park, including its aesthetic or scenic amenity values. The project has been designed to avoid significant visual impacts on the Great Barrier Reef World Heritage Area by ensuring appropriate setback distances to the shoreline and by ensuring that buildings are predominantly below the height of the existing mature trees on the site. The design, colour palette and construction materials of buildings and infrastructure will also compliment the natural environment. On the basis of the above criteria, the project will not have a significant adverse impact on the Great Barrier Reef World Heritage Area.

NATIONAL HERITAGE PLACE

The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) establishes the National Heritage List, which includes natural, Indigenous, and historic places that are of outstanding heritage value, including the Great Barrier Reef World Heritage Area. The Act also establishes the Commonwealth Heritage List, which comprises natural, Indigenous, and historic places on Commonwealth lands and waters or under Australian Government control, determined by the Minister as having Commonwealth Heritage values. The proposal is considered consistent with these management principles, as:

- The proposal will ensure the ongoing protection and conservation of the Great Barrier Reef World Heritage Area;
- The proposal has been based on numerous site surveys to ensure that the design and location of the resort protects the site's environmental values;
- The proponent has entered into a Cultural Heritage Agreement with the Traditional Owners to ensure best available knowledge and skills in managing the Indigenous Heritage Values of the site; and
- A Construction Environmental Management Plan is proposed which will include requirements for monitoring and review.



Figure 4: Aerial view of site.

6. MANAGING ENVIRONMENTAL IMPACTS

Measures to avoid, mitigate, and manage potential environmental impacts have been identified for the project and have been embodied in the Development Approval, Operational Work Approval, and Nature Refuge Agreement, and or can be conditioned, as an output of the Preliminary Documentation process.

MNES	Avoidance	Mitigate	Manage	Timing
Flatback Turtle	<p>Development site located away from turtle nesting sites.</p> <p>No development on foreshore.</p>	<p>Implement light management strategies to ensure lighting is located, directed, shielded and specified so as to not spill onto the beach.</p>	<p>Appropriate pest and waste management protocols.</p> <p>Increase staff and visitor knowledge by implementing the Code of Conduct on Turtle Nesting Beaches.</p> <p>Implement Erosion and Sediment Control Plan requirements.</p>	At all times.
Dugong	<p>Shipping channels to avoid seagrass areas where possible.</p>	<p>Designate 'go slow' zones to minimise potential for boat strikes for all operations in Graham Creek and Hobble Gully.</p>	<p>Adoption of erosion and sediment control measures.</p> <p>Implement Erosion and Sediment Control Plan requirements.</p>	At all times.
Listed Threatened or migratory bird species	<p>Development avoids significant sites and habitat areas.</p>	<p>Implement the Rehabilitation Strategies as per the approved U Plan Landscape Plans.</p> <p>Prepare an implement a Shorebird Management Plan, including the identification of preferred flight paths.</p>	<p>Implement the Vegetation Management Plan to successfully manage the sites vegetation during the construction phase of development.</p> <p>Implement the Fauna Habitat Management Plan and the management of pest species.</p> <p>Waste material contained within the designed maintenance area.</p> <p>Weed control measures to prevent the introduction of plants other than native plants onto the Island by construction vehicles, resort guests, resort vehicles and service providers.</p>	At all times.

MNES	Avoidance	Mitigate	Manage	Timing
			<p>Landscaping plans prepared for the site are to include endemic and use non-invasive species only.</p> <p>Implement Erosion and Sediment Control Plan requirements.</p>	
World Heritage Properties and National Heritage Place	Development and infrastructure is not located within the Great Barrier Reef Marine Park.	Visual amenity: controls on building locations; heights and colours; retention of trees; and landscaping with endemic species.	<p>A Construction Environmental Management Plan will be prepared for the project.</p> <p>Implement the Fauna and Vegetation Management Plans.</p> <p>Implement the approved Cultural Heritage Management Plan for the Development.</p>	At all times.

7. CONCLUSION

The proposed Turtle Street Beach Resort project has been subject to rigorous State and Local Government assessment processes which commenced in 1989. Since this time the proponent has been involved in a complex process of approvals and negotiation with Commonwealth, State, and Local Government agencies, resulting in numerous site investigations and a Development Permit (Operational Works) and Planning and Environment Court Consent Order for the proposed tourist resort. Through this process the design of the resort has been refined to become significantly lower in scale and intensity. Approximately 32,890 hectares of the original Monte Christo holding has been either surrendered to the State for National and Conservation Park or for a Vegetation Off-Set Area (18,950 ha.). During that time all cattle grazing has ceased; noting that a cattle station had been operating for over 150 years on the Monte Christo property.

The information in the Preliminary Documentation has demonstrated that the project has been located and designed to ensure that:

- The project will not have a significant impact on the Flatback Turtle population. The site is not located adjacent to a beach commonly used for turtle nesting and the main nesting beach on Curtis Island being located greater than 6 km to the south of the resort node. While the likelihood of turtles being found on the beaches north of the resort is low, no development is proposed on the foreshore and a lighting plan has been prepared so as to not contribute to the overall sky glow for the area. The lighting measures will ensure no impacts to Flatback turtles to the south of the resort. The nearest turtle nesting habitat to the south of the resort lies >6 km away and is not in direct line of sight from the resort buildings. Notwithstanding this, the lighting design, which considers both indoor and outdoor light sources, is aimed at the possibility of turtles nesting within a 1.5 km radius, a much greater proximity than the nesting beach at South End;
- The project will not have a significant impact on the Dugong population. Only small patches of seagrass being located throughout Graham Creek and Hobble Gully lead to the barge landing; as such the presence of dugongs in these areas is considered rare. The number of barge movements will be low. Despite this, restrictions are proposed on boating speed in Graham Creek and Hobble Gully to maintain “no wash” to a maximum of 5 knots;
- The project will not have a significant impact on listed threatened or migratory bird species, with key habitat areas avoided, and no substantive vegetation clearing proposed. Further, the location and design of the proposed dam will ensure impacts on migratory birds are avoided because it:
 - is located in an area that is largely cleared of woody vegetation and avoids direct impacts on tidal areas/potential wader bird habitat;
 - will incorporate appropriate wave and erosion protection as to avoid downstream erosion/sedimentation impacts on areas of potential wader bird habitat; and
 - is relatively small and therefore allows for the continuation of environmental flows.
- The dam is likely to provide additional habitat features for some species of wetland birds, but is unlikely to provide supplementary habitat for waders given its depth and freshwater condition. Management measures will also be implemented to prevent negative impacts associated with the potential introduction or spread of invasive plant and animal species by the proposal. Furthermore, a Fauna Management Plan and Vegetation Management Plan has been prepared by Logic Environmental (2015) to ensure the successful management of the site's vegetation during the construction and operation of the proposed development;

- The proposal avoids direct impacts on known roosts and foraging habitat of migratory wetland species located beyond the mouth of Graham Creek. Indirect impacts on wetland migratory species are not anticipated to arise from barge movements, the runway or other operational functions of the proposal owing to the location of these activities (i.e. away from sensitive environments) and management measures. There are no known threatened bird species within the project area and the proposal avoids, and is separated from, potential habitat of threatened bird species such as the Black-Breasted Button-Quail; and
- The project will not have a significant impact on the Great Barrier Reef World Heritage Area and National Heritage Place. The proposal will not result in the release of degraded stormwater or harmful chemicals in the marine environment. The wastewater treatment plant will be designed, constructed, operated and maintained to produce a consistent Class A+ recycled water. Additionally, the project has been designed to avoid significant visual impacts on the Great Barrier Reef World Heritage Area by ensuring appropriate setback distances to the shoreline, ensuring buildings are predominantly below the height of the existing mature trees on the site and the colour palette and construction materials will also compliment the natural environment.

The project will not result in a residual adverse impact on matters of national environmental significance and as such an environmental offset is not required.

The proponent submits that based on the original referral and additional investigations, the proposed action will not have a significant impact on any matter of national environmental significance, and as such should be approved subject to the proposed mitigation measures identified in the Preliminary Documentation material.

8. NEXT STEPS AFTER PUBLIC COMMENT

At the end of the public comment period the proponent will review all submissions and update reporting as required. All submissions and updates will be forwarded to the Commonwealth. The application will then be assessed by the Commonwealth in accordance with the provisions of the *Environmental Protection Biodiversity Conservation Act 1999*.

9. FURTHER INFORMATION

Information on the project, including all referral and preliminary documentation can be found at:

- Website: <http://www.turtlestreet.com.au/>
- State Library of Queensland, Cultural Precinct, Stanley Place, Southbank; and
- Gladstone City Library , 39 Goondoon Street, Gladstone