



**Friends of  
the Earth**  
Far North Queensland

**Submission regarding  
Draft terms of reference for an  
environmental impact statement:  
KUR -World Integrated "Eco-Resort"  
August 2016**

**Comment form: Draft terms of reference (TOR)**

Name of project

KUR -World Integrated "Eco-Resort"

Your details (please print)

Full name

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**Matters of concern or interest**

Friends of the Earth FNQ is an environmental and human rights group working on a wide range of issues in the Far North, including sustainable development. We have concerns about KUR-World for the following reasons:

**Destruction of our Environment and its Wildlife**

The project area straddles sensitive habitat for 20 endangered species and an additional 13 vulnerable species. It would severely impact on the Kuranda Envirolink Corridor and break the linkage between the Fairyland Land , Envirolink and other Corridors that would likely have been used by the Southern cassowary up until the recent clearing by the proponent.

There was unlawful and poor dam construction in late 2015 plus clearing with soil disturbance and little or no soil erosion and sediment control . This led to the habitat of the Kuranda tree frog being polluted and this sediment is now on its way to our fragile Great Barrier Reef.-

## **Damaging to our Community and Cultural Heritage**

KUR-WORLD could change the quality of life in our community forever. Roads would be congested, electricity, telecommunication, medical and emergency services further overloaded and water resources depleted and polluted. This development is out of scale to our planned population growth.

To our knowledge, no Traditional Owners have been consulted and no survey done for cultural artefacts and sacred sites. However we understand by verbal communication from Bulwai Cultural custodian Willie Brim that sites of cultural significance do exist on this property.

## **Impact on local Businesses and Jobs**

For a development of this size, it would be likely that much of the construction work would go to larger contractors. These would be unlikely to be local. They could even be international. KUR-World would be competing with existing tourism businesses locally and across the region.

For the above reasons and the ones listed below, we would like to introduce the following changes and in addition support the ones submitted by Kuranda EnviroCare and experts:

## **Changes ( additions in italics)**

### **Stormwater drainage section**

*10.27 Detail the sources of stormwater and the quantity, quality and location of discharge to watercourses and marine areas and its possible impact on threatened species in the area.*

*10.33 Describe sedimentation control measures and location of sediment traps especially in regards to the dam but also for land clearing already undertaken and planned in the future*

*10.34 Describe erosion control currently in place and planned for construction in the future especially in regards to dam*

### **Land Use**

*11.4b) how the proposal will integrate with existing community facilities and infrastructure including regional and local roads, electricity, telecommunication, medical and emergency services and water resources for irrigation of any planned activities on the site such as a golf course. REASON: to ensure integration with all types of infrastructure and services are described*

*11.9 Discuss the economic, social, health and cultural- both Indigenous and non -Indigenous impacts of the project on the Kuranda Village and the proposed linkages and interaction of the project with the Kuranda and the surrounding region.*

**REASON: proponent needs to discuss all types of impact in the area as these would be**

**significant .**

11.21 Describe the hydrology within the study area and the adjoining waterways in terms of water levels , discharges and freshwater flows. Detail the interaction of groundwater and surface water.

11.21i) *Explain the degree of loss of groundwater recharge expected and how this would be mitigated.*

**REASON:** Groundwater recharge happens when rain falls on natural surfaces such as grass and especially forest. Rain falling on impervious surfaces, roads buildings etc. goes straight to stormwater run-off so is lost to groundwater recharge. Impervious surface area x annual rainfall = reduction in groundwater recharge. This change to water table will impact on domestic bores supplying residential and rural properties – especially bores supplying residents of adjacent properties.

11.21ii) *Estimate the degree to which the water table would be depleted due to bores sunk for KUR-World and how this would be mitigated.* **REASON:** It seems obvious that the development will sink bores that will further massively deplete the water table exacerbating the impact of the above.

**11.27 e) sedimentation of creeks that are habitat of the Kuranda tree frog REASON:** there was unlawful and poor dam construction in late 2015 plus clearing with soil disturbance and little or no soil erosion and sediment control. This led to the habitat of the Kuranda tree frog being polluted. Therefore this development has already impacted negatively on the water quality and it needs to be specified in EIS how further sedimentation would be avoided.

## **Social and Economic**

11.28 **Objectives a) avoid or mitigate adverse social and economic impacts arising from the project including loss of amenity for neighbouring properties REASON:** the proposed access road to the Kennedy highway would come within 20m of the front door of the Watson's 11 Myola Road **and increase in noise levels due to traffic REASON:** Huge amount of building and road-making materials being transported to site. At about 3 cement trucks per dwelling it would be massive – there needs to be proper calculation of this traffic volume.

11.33 b) v) *the effect on community health ( including mental health) REASON:* Increased rates of suicide and mental illnesses have been documented in places such as the Hunter Valley where there has been extensive environmental destruction.

11.33 b) vi) *the effect on cultural identity REASON:* Kuranda Indigenous and non-Indigenous identity has been based on a close link with the rainforest and this is an important potential negative impacts

add 11.36 b) *Explain how the project would qualify for Australian eco certification REASON:* Ecoresort carries an economic advantage that resort does not. The title implies it would be an “ECO-Resort”.

**11.37** Describe the local and regional economies likely to be impacted by the project and identify the relevant stakeholders. *Include the likely impact on the cost of building materials.* **REASON:** The massive demand on building materials is likely to cause an increase in price and decrease in affordability and availability for locals.

## **Economic impact assessment**

11.44 Discuss the impact of the proposed permanent road closures *on cultural and social values*  
**REASON: these are important walking tracks between communities**

### **Hazard , health & safety**

Objectives add:

c) *the risk of zoonoses are avoided in the development such as*

*ci) mosquito borne disease e.g. dengue, malaria, Ross River fever*

*cii) viruses spread from mammals such as flying foxes and horses especially in rain-forested areas e.g. Hendra, Lissa virus* **REASON: The design includes several features that might increase the risk of these diseases: the dam, numerous other water features plus irrigation of the gardens, pot plants and golf course for mosquito borne disease. The mix of horses and rainforest for Hendra and the mix of high density of tourists, not used to flying foxes, and flying foxes for Lissa virus.**

*Ciii) tick and mite borne tropical disease such as scrub typhus and Queensland tick fever*

**REASON: These diseases are associated with the vegetation in Far North Queensland and the large numbers of tourists planned would be exposed to these in the planned natural surroundings.**

*d) the risk of epidemics such as vain and swine flu is mitigated against* **REASON: the close living conditions of tourists would provide ideal conditions for epidemics. This is especially likely due to a focus on visitors from Hong Kong and mainland China, both with a history of frequent outbreaks of epidemics. The local area has limited medical facilities not equipped to deal with large scale epidemics in a rural area.**

*12.10 e) the risk of sedimentation and pollution of the water supply of neighbouring properties.*

*12.10 f) risk of dam failure and impact on properties downstream* **REASON: Dam is upstream from several neighbouring properties and has been reported not to meet dam safety regulations**

**12.15** Describe flood risk for a.... and assess how the project may change flooding characteristics *including the risk of the recently constructed dam overflowing or even failing.* Include a discussion of historical events. **REASON: Dam is upstream from several neighbouring properties and has been reported not to meet dam safety regulations**

### **Noise and vibration**

**12.17** Fully describe the characteristics of noise and vibration sources.....that may occur during construction, commissioning, upset conditions and operation *including road traffic and air movements including helicopter and plane.* **REASON: Promotion video shows helicopter flights**

**12.21 b)***Describe the effect of noise on threatened species including the southern cassowary.* **REASON: Several sightings have been made of cassowaries close to development and it is believed that they may be moving through and even be in property- see letter from Jax**

Bergersen in appendix B.

## Water resources

12.24 c) direct and indirect impacts arising from the development *including on threatened species*. **REASON: 2 creeks that provide habitat to the Kuranda tree frog have been polluted with sediment.**

12.27 b) Explain how demand for portable water can be met other than relying on Kuranda town water. The portability of Kuranda town water is currently disputed by Friends of the Earth Far North Queensland. **See letter to MP Craig Crawford outlining the reasons in Appendix A.**

## Listed threatened species and communities

13.46 Specify how the cassowary habitat and wildlife corridor, previously provided by the regrowth vegetation on eastern and north eastern side of the property, linking the Kuranda EnviroCare wildlife corridor and the Fairylink corridor would be remediated to prevent negative impact on the Southern cassowary. **REASON: Several sightings have been made of cassowaries close to development and it is believed that they may be moving through and even be in property- see letter from Jax Bergersen in Appendix B and QLD regrowth map with wildlife corridors marked red in Appendix C**

13.47 Specify how the two creeks that are habitat to the Kuranda tree frog would be rehabilitated and the banks re vegetated to avoid further sedimentation and negative impact on the Kuranda tree frog. **REASON: there was unlawful and poor dam construction in late 2015 plus clearing with soil disturbance and little or no soil erosion and sediment control. This led to the habitat of the Kuranda tree frog being polluted.**