



SARA reference: 2302-33271 SRA
Council reference: ROL/2023/1

1 March 2023

Mo Chen and Ying Yuan
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PO Box 458
MIAMI QLD 4220
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Attention: Mr Scott Barrett

Dear Mr Barrett

SARA information request—17 Courtney Drive, Upper Coomera

(Given under section 12 of the Development Assessment Rules)

This notice has been issued because the State Assessment and Referral Agency (SARA) has identified that information necessary to assess your application against the relevant provisions of the State Development Assessment Provisions (SDAP) has not been provided.

Proposed development details and response to State code 25

1. **Issue**

Insufficient information has been provided for SARA to adequately assess compliance against State code 25: Development in South East Queensland koala habitat areas (State code 25) of the SDAP. Specifically, the application material does not include a response to State code 25 and further proposal details are required to enable a complete assessment against the code.

Action

You are requested to provide the following information:

- Provide an amended plan which clearly demonstrates the extent of interference with mapped koala habitat areas (KHA) that will occur as a result of the proposed development. The plan should include:
 - o The sizes (m² or ha) and locations of proposed building envelopes, including necessary firebreaks if these are to be located outside the building envelopes.
 - o The location/s of any infrastructure or treatment zones to be established,

	modified or demolished as a result of the proposed development (e.g., dwellings, driveways, roads, stormwater management systems, water supply, sewerage systems, effluent disposal, utilities, etc.). - o The location of proposed roads, tracks and fences. - o The location of any areas proposed to be protected and/or rehabilitated. You are recommended to provide a rehabilitation plan should rehabilitation be proposed. - o Proposed landscaping areas (if proposed). • A full response to State code 25 inclusive of an assessment against the Performance outcomes (PO). Please refer to the Guideline: State Development Assessment Provisions which contains information on how to respond to POs and specific information requirements. It should be noted that if a PO has no relevance to the proposed development a response of “not applicable” and a statement as to why it is not relevant is required. • Confirmation of whether any future Operational Work (e.g., clearing, levelling or filling) will be required on site to facilitate the proposed development. • Confirmation of any machinery to be used or stored on the site to facilitate the development.
Koala habitat values assessment	
2.	<u>Issue:</u> Insufficient information has been provided for SARA to adequately assess compliance against State code 25. More specifically, the application material does not include a koala habitat values assessment and clearly identify the extent of the proposed interference with mapped KHA. <u>Action:</u> You are requested to provide a koala habitat values assessment prepared by a suitably qualified ecologist to identify koala habitat areas and koala habitat values that exist on site, which: (a) Includes a tree survey plan showing the location of all native trees onsite, including: i. identification numbers that correspond to each tree ii. GPS coordinates for each tree iii. the species of each tree iv. the height of each tree v. the circumference of each tree at 1.3 metres above the ground vi. the tree protection zone of each tree vii. special features that exist on each tree (e.g., hollows (including approximate size), nests, scratches, termitaria, etc.) viii. what tree species utility it has been assigned by Appendix 4 of Spatial modelling for koalas in South East Queensland ix. if a tree is a koala habitat tree, whether it is a non-juvenile koala habitat tree (NJKHT*) x. whether each tree is inside or outside the mapped KHA

	xi. whether each tree is to be retained or removed; and (b) Confirms the number of NJKHTs proposed to be removed which are located in mapped KHAs. <i>*Note: A NJKHT is a tree of the Corymbia, Melaleuca, Lophostemon, Eucalyptus or Angophora genus that is more than 4m high OR has a trunk with a circumference of more than 31.5cm at 1.3m above the ground.</i>
Matters of State Environmental Significance (MSES), rehabilitation and protection of KHA	
3.	<u>Issue</u> Insufficient information has been provided for SARA to adequately assess compliance against PO11 of State code 25. The application material has not discussed MSES that occur on the site or potential impacts to MSES as a result of the proposed development. Therefore, SARA is unable to assess whether impacts to MSES have been firstly avoided or minimised in compliance with PO11. Additionally, the application material has not discussed or considered whether rehabilitation could occur on site to mitigate the proposed impacts to KHA. Lastly, insufficient information has been provided to determine how remaining mapped KHA on site will be protected. <u>Action:</u> You are requested to provide a report prepared by a suitably qualified ecologist that: (a) Identifies all mapped KHA MSES onsite and likelihood of occurrence for the MSES based on the habitat values found on site. (b) Demonstrates how impacts to the identified mapped KHA MSES have been avoided to the greatest extent possible. (c) Demonstrates how any impacts to the mapped KHA MSES that cannot be avoided have been minimised and mitigated to the greatest extent possible. You are advised to consider mitigation measures such as: - o Retaining mapped KHA in locations that will allow koalas to use and move through the site. - o Retaining mapped KHA which has been identified through an ecological survey as being of higher use for koalas (e.g., retaining components of mapped KHAs with more records or other signs of koala use (i.e., scats or tree scratching) or areas that contain koala habitat trees preferred by koalas (e.g., blue gum)). - o Retaining particular koala habitat trees that koalas are using which have been identified through an ecological survey and ensuring that koalas can move safely between the koala habitat tree and other mapped KHAs. - o Improving degraded koala habitat areas that are to be retained on the site by removing weeds and planting koala food trees endemic to the site (based on the sites regional ecosystem(s)). - o Minimising impacts on retained habitat and koalas using the area by providing a buffer between development and any retained koala habitat; and/or managing edge effects on retained koala habitat including: ☐ Changes in soil condition, such as nutrients and erosion ☐ Altered hydrological flow ☐ The introduction or increase of weed and exotic plant species ☐ Disturbances to vegetation

	☐ Modified fire regime ☐ The introduction of predators to koalas ☐ Increased light, noise or dust. (d) Provides a significant residual impact (SRI) assessment for any residual impact on the mapped KHA MSES (after all avoidance, minimisation and mitigation measures have been demonstrated) in accordance with Chapter 2A of the Queensland Environmental Offsets Policy. (e) Quantifies the maximum extent of proposed significant residual impact SRI to the mapped KHA MSES both in area (hectares) and on a plan. (f) Identifies the location/s of any areas proposed to be protected and/or rehabilitated. For remaining mapped KHA onsite, you are requested to include the following information within a report: (a) Identify any mechanisms proposed to protect remaining areas of KHA, such as an environmental covenant. (b) A map or shape file of the location of any proposed covenant area. (c) The demonstration of alternative development options that have been considered to retain more mapped koala habitat (e.g., all covenant locations that were considered), taking into consideration the results of a koala habitat value assessment. (d) Provision of improvements to the identified covenant areas by removing weeds and planting koala food trees endemic to the site (based on the site's regional ecosystem).
Koala sensitive design measures, fragmentation and connectivity	
4.	<u>Issue</u> Insufficient information has been provided for SARA to adequately assess compliance against PO6, PO7, PO8 and PO9 of State code 25. Specifically, the application material does not address sensitive design measures and how the proposed development will not adversely impact the movement of koalas through the site. Furthermore, the application material does address how habitat connectivity will be maintained. <u>Action:</u> You are requested to provide the following information, prepared by a suitably qualified ecologist: (a) The demonstration of how habitat connectivity will be maintained by retaining existing connections between mapped KHAs and/or identified corridors including: i. the dimensions of the area (e.g., length by width) proposed to be retained to avoid fragmenting mapped KHAs ii. the composition of the area retained (e.g., whether the area contains remnant or regrowth vegetation, identification of the flora species in the retained area, confirmation of whether it contains mapped KHA or other native/non-native vegetation, confirmation of whether the area is cleared and the location and distance between mapped KHAs or individual trees) iii. the identification of any proposed actions that will be undertaken to avoid fragmenting mapped KHAs that will improve connectivity between mapped KHAs (e.g., removing barriers, revegetating with koala habitat trees, the density of plantings, the distance between planted trees, encouraging natural

	revegetation, incorporating principles of koala-sensitive design) iv. the identification of any management actions to ensure corridor functionality is maintained as anticipated. (b) An assessment of the connectivity values and safe koala movement opportunities that would exist on the site post-development. (c) Identification of any barriers to koala movement that will be proposed by the development (e.g. roads, fences, retaining walls and the introduction of residential threats and areas without koala habitat trees that increase the time koalas would need to spend on the ground). (d) Identification of measures that will be undertaken to ensure koalas can move safely within and between highly connected patches of mapped KHA. (e) Justification for why all proposed measures above are suitable for providing safe koala movement opportunities. <i>Note: For more information please refer to the Koala Sensitive Design Guideline.</i>
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How to respond

You have three months to respond to this request and the due date to SARA is 1 June 2023.

You may respond by providing either: (a) all of the information requested; (b) part of the information requested; or (c) a notice that none of the information will be provided. Further guidance on responding to an information request is provided in section 13 of the [Development Assessment Rules](#) (DA Rules).

It is recommended that you provide all the information requested above. If you decide not to provide all the information requested, your application will be assessed and decided based on the information provided to date.

You are requested to upload your response and complete the relevant tasks in [MyDAS2](#).

If you require further information or have any questions about the above, please contact Lydia Summers, Senior Planning Officer, on 07 5644 3217 or via email SEQSouthPlanning@dsdilgp.qld.gov.au who will be pleased to assist.

Yours sincerely



David Hooper
Manager

cc Gold Coast City Council, mail@goldcoast.qld.gov.au

Development details	
Description:	Development Permit for Reconfiguring a Lot – One (1) Lot into Two (2) Lot Subdivision
SARA role:	Referral agency
SARA trigger:	Schedule 10, Part 10, Division 3, Subdivision 3, Table 1, Item 1 - Development interfering with koala habitat in a koala habitat area outside the koala priority area (Planning Regulation 2017)

Development details	
SARA reference:	2302-33271 SRA
Assessment criteria:	SDAP: State code 25