

SARA reference: 2302-33455 SRA
 Your reference: 11241
 Council reference: COM/2023/16

13 March 2023

Coomera GA Pty Ltd ATF The Coomera GA Unit Trust
 c/- Saunders Havill Group
 andrewmclean@saundershavill.com

Attention: Mr Andrew McLean

Dear Mr McLean

SARA information request - 54 George Alexander Way, 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 performance outcomes (PO) of State code 25: Development in South East Queensland koala habitat areas (State code 25) of the State Development Assessment Provisions, version 3.0 (SDAP) has not been provided.

Interfering with mapped koala habitat areas (KHA)	
1.	Issue: The application material has not discussed the western portion of the lot and how the remaining mapped KHA on site will be protected in perpetuity. As such, insufficient information has been provided to demonstrate compliance with PO6-PO11 of State code 25 of SDAP. The application material should discuss legal security measures such as environmental covenants or land dedication where appropriate to protect remaining areas of the site which could be suitable for rehabilitation. Action: Provide a report prepared by a suitably qualified ecologist that: (a) Identifies areas of existing mapped KHA on site and investigates mechanisms to protect these areas through a legal security mechanism such as an environmental covenant. (b) Identifies areas of the site that may be suitable for planting of koala habitat trees. (c) Provides a map or shape file of the location of the covenant area. (d) Provides details 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).
2.	Issue: The application material does not demonstrate any mitigation of impacts to the mapped KHA

	and as such does not demonstrate compliance with PO5 and PO11 of State code 25 of SDAP. Action: Provide additional information to demonstrate compliance with PO5 and PO11, including: (a) Retaining mapped KHA in locations that will allow koalas to use and move through the site. (b) Retaining mapped KHA which have been identified through an ecological survey as being of higher use for koalas (e.g., retaining components of KHA 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). (c) Retaining particular mapped 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 KHA. (d) Improving degraded mapped KHA 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)). (e) Minimising impacts on retained habitat and koalas using the area by: (i) providing a buffer between development and any retained koala habitat and/or (ii) 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 ☐ a modified fire regime ☐ the introduction of predators to koalas ☐ increased light, noise or dust.
3.	Issue: The application material has not demonstrated how the design of the proposed development will not adversely impact the movement of koalas through the site in accordance with PO2, PO4, PO7 and PO9 of State code 25 of SDAP. Action: Provide the following information, prepared by a suitably qualified ecologist: (a) Any actions that will be undertaken on land retained to avoid fragmenting mapped KHA that will improve connectivity between mapped KHA (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 (described in the Koala-sensitive design guideline)). (b) Provides an assessment of the connectivity values and safe koala movement opportunities that would exist on the site post-development. (c) Identifies barriers to movement that will be proposed by the development (e.g. established roads, fences, and retaining walls, introduction of residential threats such as pools and dogs and areas without koala habitat trees that increase the time koalas would need to spend on the ground). (d) Outlines measures that will be undertaken to ensure koalas can move safely within and between highly connected patches of koala habitat area. (e) Provides justification for why the proposed measures are suitable for providing safe koala movement opportunities. For more information see the 'Koala-sensitive Design Guideline: A guide to koala-sensitive design measures for planning and development activities', available at: https://environment.des.qld.gov.au/__data/assets/pdf_file/0025/102859/koala-sensitive-design-guideline.pdf.

4.	<u>Issue:</u> The application material has not demonstrated the development will avoid fragmenting koala habitat or provide for connectivity and safe koala movement opportunities, particularly given the large patch of mapped KHA to the west. As such the proposal does not demonstrate compliance with PO1-PO2, PO4 and PO6-PO9 of State code 25 of SDAP. <u>Action:</u> Provide the following information, prepared by a suitably qualified ecologist: (a) A demonstration of how habitat connectivity will be maintained by retaining existing connections between mapped KHA and/or identified corridors including: (i) the dimensions of the area (e.g., length by width) proposed to be retained to avoid fragmenting mapped KHA (ii) the composition of the area retained (e.g., does the area contain remnant or regrowth vegetation, what are the flora species in the retained area, does it contain mapped KHA, other native or non-native vegetation, is the area cleared, what is the location and distance between mapped KHA or individual trees) (iii) any actions that will be undertaken to avoid fragmenting mapped KHA that will improve connectivity between mapped KHA (e.g., removing barriers, revegetating with koala habitat trees, incorporating principles of koala-sensitive design (described in the Koala-sensitive design guideline)) (iv) management actions to ensure corridor functionality is maintained as anticipated (v) discussion on why those areas are suitable for maintaining connectivity for koala movement (with consideration to the points mentioned on page 11 of the State code 25 Guideline). (b) A description of measures that will be undertaken to ensure koalas can move safely within and between connected patches of mapped KHA. (c) A justification for why the proposed measures are suitable for providing safe koala movement opportunities. (d) An assessment of the connectivity values and safe koala movement opportunities that would exist on the site post-development.
5.	<u>Issue:</u> The application materials have not discussed or considered rehabilitation that could occur on site. As such the proposal does not demonstrate compliance with PO5 and PO11 of State code 25 of SDAP. <u>Action:</u> The applicant should provide a report prepared by an appropriately qualified ecologist that details: (a) The locations of any areas proposed to be protected and/or rehabilitated. (b) Rehabilitation plans for any proposed rehabilitation. (c) Consideration and feasibility of improving degraded mapped KHA 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)).
6.	<u>Issue:</u> The application material has not sufficiently demonstrated that impacts to matters of State Environmental Significance (MSES), being the mapped KHA, have been avoided, minimised and mitigated despite evidence of koala on site. As such the proposal does not demonstrate compliance with PO5 and PO11 of State code 25 of SDAP. <u>Action:</u> The applicant should provide a report prepared by an appropriately qualified ecologist that: • Identifies all MSES on site, being the mapped KHA, and provides a likelihood of occurrence list for this MSES based on the habitat values found on site. • Demonstrates how impacts to the identified MSES, being the mapped KHA, have been avoided to the greatest extent possible. • Where all or part of the MSES, being the mapped KHA, cannot be avoided, demonstrate

	how any impacts to MSES that cannot be avoided have been minimised and mitigated to the greatest extent possible (e.g., through alteration of proposed development configuration (multi-story instead of single-story buildings, smaller development footprint, planting on site, etc)). - Provides a significant residual impact assessment for any residual impact on the MSES, being the mapped KHA, (after all avoidance, minimisation and mitigation measures have been demonstrated) in accordance with: - Chapter 2A of the Queensland Environmental Offsets Policy for koala habitat, available at: https://environment.des.qld.gov.au/__data/assets/pdf_file/0018/293400/offsets-policyv1-13.pdf. - Quantifies the maximum extent of proposed significant residual impact to the MSES both in area (ha) and on a plan.
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How to respond

You have three months to respond to this request and the due date to SARA is **9 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 Gabriel Escobar, A/Senior Planning Officer, on (07) 5644 3212 or via email SEQSouthPlanning@dsdilgp.qld.gov.au who will be pleased to assist.

Yours sincerely



Karley Lawler
Manager, Planning and Development Services (SEQ South)

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

Development details	
Description:	Combined application for a Material change of use for Dual occupancy (6) and Reconfiguring a lot for 1 lot into 26 lot subdivision (including 24 freehold residential lots, 1 drainage Lot and 1 balance Lot), and new road over 2 stages
SARA role:	Referral agency
SARA trigger:	Schedule 10, Part 10, Division 3, Subdivision 3, Table 1, Item 1 – Development interfering with koala habitat in koala habitat areas outside koala priority areas.
SARA reference:	2302-33455 SRA
Assessment criteria:	State code 25 of the SDAP