

Our ref: 11241
Your ref: OPW/2024/111

5 March 2024

Attention: Sophie Olsson-Pons
City of Gold Coast
PO Box 5042
Gold Coast MC QLD 9726

Via email: mail@goldcoast.qld.gov.au

Dear Sophie,

RE: GEORGE ALEXANDER WAY - RESPONSE TO INFORMATION REQUEST

We act on behalf of Coomera GA Pty Ltd ATF The Coomera GA Unit Trust, the Applicant in relation to the Operational Works Application lodged with the City of Gold Coast Council.

On 14 February 2024, an Information Request (IR) was received for Operational Works application OPW/2024/111. It is noted that the time period for response listed in the letter is 3 months.

The following attachments are provided:

Attachment A – Amended VCFMP

Attachment B – Approved Koala Management Plan

Attachment C – Environmental offset calculator results

Attachment D – Rehabilitation Management Plan

A response to items 1 to 4 of the IR is provided below.

Item 1 – Amendments to the submitted Fauna Management Notes

To comply with PO22 of the Environmental significance overlay code, the applicant is requested to make the following amendments to the submitted Fauna Management Notes prepared by Saunders Havill Group:

- a. Habitat trees are to be identified and flagged prior to clearing and left for a minimum of 24 hours after all other non-habitat trees are felled.*
- b. Habitat trees can be felled upon confirmation that native fauna is not present or upon confirmation that the tree can be felled safely.*
- c. Phase 2 of the Clearing Phases and Process is to include the identification and flagging of habitat trees prior to Council Per-start meeting.*

Response

The VCFMP has been amended with specific notations surrounding habitat trees. The amended VCFMP is provided at **Attachment A**.

Item 2 – Koala Management Plan

The applicant is requested to submit the approved Koala Management Plan, prepared by Saunders Havill Group dated 03/02/2023, as part of the application package in accordance with Condition 13 of application COM/2023/16.

Response

The approved Koala Management Plan is provided at **Attachment B**.

Item 3 – Delivery of Environmental offsets

To comply with Condition 42 of application COM/2023/16, the applicant is requested to deliver an environmental offset for impacts to 12,400 m² of Medium priority vegetation, prior to any works commencing.

Response

The offset will be delivered prior to works commencing on site in accordance with Condition 42 of the development permit. The preliminary offset calculator results for the impacts on Medium priority vegetation are attached at **Attachment C**.

Item 4 – Compliance with SARA conditions

Prior to any works commencing on the subject site, the applicant is requested to comply with the following SARA conditions, as identified in Document Number 2302-33455 SRA:

- a. Condition 1 – Clearing is limited to the removal of 128 non-juvenile koala habitat trees identified as Non-juvenile koala habitat tree to remove, Non-juvenile Koala habitat tree in neighbouring lot retention subject to arborist assessment and Non-juvenile Koala habitat tree to remove as exempted development on the Koala Habitat Area Impact Assessment, prepared by Saunders Havil Group, dated 18/08/2023, reference*

11241 E 02 KHA Impact B and issue B. The submitted Tree Schedule, as identified in the Vegetation Clearing and Fauna Management Plan, prepared by Saunders and Havill Group, identifies 170 Non-juvenile Koala Habitat Trees (NJKHT) for removal. This is requested to be amended to reflect what has been approved by SARA.

- b. Condition 4 – The applicant is requested to engage an appropriately qualified person to prepare a Rehabilitation Plan prior to undertaking any clearing works.
- c. Condition 5 – The applicant is requested to deliver an environmental offset in accordance with the Environmental Offsets Act 2014 to counterbalance any significant residual impacts on the matter of state environmental significance being 128 non-juvenile koala habitat trees.

Response

- a. The trees to be removed as identified on the Koala Impact Assessment is consistent with those marked to be removed under the amended VCFMP and associated tree schedule. It is noted that the number of NJKHTs to be offset (128) is calculated based on the below table provided by SARA utilising the figures from the Koala Impact Assessment plan and is considered an administrative process concerning SARA's determination of appropriate offsets.

Labels on Tree GPS Plot Data Plan	Total NJKHTs
Non-juvenile Koala habitat tree in neighbouring lot, retention subject to arborist assessment	6
Non-juvenile Koala habitat tree to remove	40
Non-juvenile Koala habitat tree to remove as exempted development (minus Koala Habitat Area that can be cleared under exempted development (l)(i) boundary clearing)	96 (-14) 82
Total	128 NJKHTs

- b. A Rehabilitation Management Plan (RMP) has been prepared and provided to SARA and is considered compliant with the condition. The RMP is provided at **Attachment D**.
- c. The offset will be delivered prior to works commencing on site in accordance with Condition 5 of the SARA approval.

We offer this as a response to all of the information requested in Council's Information Request. If you require any clarification, please contact me on (07) 3251 9480 or email at amywestman@saundershavill.com.

Yours sincerely

Saunders Havill Group



Amy Westman
Senior Ecologist