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APPLICATION REF  
A007025538



22 May 2026  
File Ref: S524193\_OPL\_v2.0  
Contact: Jackie Thomson

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Attention: Mr Dean Hamilton

FURTHER ISSUE RESPONSE (A006351462) – 78 ROGERS PARADE WEST, EVERTON PARK –  
OFFSET PROPOSAL

This letter has been provided by S5 Environmental in response to impacts to Biodiversity Areas Overlay mapping, under the Brisbane City Council's (BCC) *City Plan 2014*, and in accordance with Item 6(c) of the above BCC Further Issues Request (A006351462) regarding the proposed development of 78 Rogers Parade West, Everton Park, and dated 11<sup>th</sup> September 2024. The proposed development is for a Material Change of Use (MCU) for a townhouse development and covenant along the northern boundary.

The total area of High Ecological Significance Strategic (HESS) **native vegetation** being removed from within the Biodiversity Areas overlay mapping, which in this instance was limited to four (4) canopy species (Trees 1-3 and Tree 13) located over maintained turf, has been calculated using aerial imagery and the Vegetation Retention Plan (refer to **S524193\_VRP\_001-002(B)**). The total area of native canopy vegetation to be removed within HESS (i.e. impact area) has been calculated as approximately **197 m<sup>2</sup>** (refer to **Figure 1**).



Figure 1. Estimated Interference with Mapped HESS within the Biodiversity Areas Overlay

No additional native vegetation was identified for removal within the mapped HESS area, as limited ecological values were assessed as present within this mapped area of the development footprint. Further, the northern extent of native vegetation is proposed for retention and rehabilitation (approximately 608 m<sup>2</sup> area) as a dedicated covenant. This area contained similar limited ecological values, with mostly native canopy species present over maintained turf. Therefore, the rehabilitation an area of approximately 608 m<sup>2</sup> of mapped HESS will be enhanced beyond anything currently present across mapped areas of HESS over the site.

In addition, it is noted that mapped HESS to the immediate west of the subject site has been developed to the extent proposed as part of this application. Accordingly, any current or potential ecological corridor values to the west are limited to the area of rehabilitation proposed across the northern extent of the site.

Overall, this assessment concluded that the total area of native vegetation to be impacted by the development across mapped HESS was limited to 197 m<sup>2</sup> (canopy of four native trees that fall within mapped HESS). Using the MLES 3 multiplier, the impact area equates to 591m<sup>2</sup> (591 x 3). As rehabilitation across the northern extent is greater than this impact area (~608 m<sup>2</sup>), it is S5 Environmental's opinion no significant residual impact will result from the proposed removal of these canopy trees, and any impact is more than offset by proposed rehabilitation works resulting in the enhancement of onsite values.



To summarise, due to the limited ecological value identified within the mapped area of HESS and the proposed rehabilitation of approximately 608 m<sup>2</sup> of mapped HESS along the northern extent, it is S5 Environmental's opinion that any additional offset is not warranted in this case.

Should you wish to discuss the above advice, please do not hesitate to contact me on the number or email address below.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jackie Thomson', with a horizontal line drawn underneath it.

Jackie Thomson

Ecologist

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