

Your Ref: 25-0192E

01/06/2026

Attn: Warwick Thomasson

Pask Group



RE: Public Submission Commentary
503 Rochedale Road- Stage 17 Arise (Jarvis), ROCHEDALE, 4123

Dear Warwick,

Therefor Group provides the following response to Public Submissions for application A006914077 dated 2nd December 2025. Please see our response to the items below.

Response to Public Submissions

DAPublic-A006914077-20260429-10461

I strongly object to the proposed development of the remaining farmland and remnant bushland habitat in this area. This land currently supports a functioning ecosystem and provides habitat for a wide range of native wildlife. Observed species include wallabies, carpet pythons, green tree frogs, and a diverse variety of birdlife. The presence of these species indicates that the land is not degraded but actively supporting biodiversity. Of particular concern is the cumulative loss of habitat in the Rochedale and surrounding areas. With nearby land already cleared or approved for development, this site may represent one of the last remaining habitat corridors for local wildlife. There is also precedent nearby, where development has been halted due to the identification of threatened species. This demonstrates that the ecological value of this region is significant and must be properly assessed before further clearing occurs. Even where specific endangered species have not yet been formally recorded on this site, the habitat is clearly suitable for threatened species known to exist in South-East Queensland, including vulnerable bird species and wetland-dependent amphibians.

The loss of this land would, further fragment wildlife habitat, reduce biodiversity in the area, disrupt existing ecosystems and increase pressure on already declining native species. I urge council to conduct a full ecological assessment, consider the cumulative environmental impact and protect this land from development. This is not just vacant land - it is an active and valuable natural habitat that should be preserved.

Our Response

The objector raises concerns regarding ecological values, habitat quality, and potential threatened species presence on the subject site. These concerns are respectfully disputed on the following grounds. As clearly visible from aerial imagery and the site's land use history, the subject site has been subject to extensive and ongoing agricultural use over a prolonged period, consistent with market gardening or similar row-cropping activities. This form of intensive agricultural land management involves repeated clearing, tilling, irrigation, and the application of agricultural inputs that are fundamentally incompatible with the retention of native vegetation, remnant habitat, or functioning ecological communities. The objector's characterisation of this land as a "functioning ecosystem" and "remnant bushland habitat" is not supported by the land use evidence nor does it conform to regulatory definitions of such. Furthermore, the subject site is not mapped as *High Ecological Significance* (or holding strategic values of high ecological significance) or *General Ecological Significance* overlays pursuant to the Brisbane City Plan 2014 Biodiversity Overlay Code. These overlays are specifically designed to identify land supporting significant ecological processes, habitat values, and biodiversity. Brisbane City Council, through its rigorous overlay mapping process, has formally determined that this site does not meet the threshold for either designation. This is a significant and determinative planning consideration, as the absence of an ecological significance overlay reflects an expert assessment that the site does not represent high-value habitat or support significant ecological processes warranting protection at a planning scheme level. Notwithstanding, the lack of HES and HESS categorisations on the land parcel, it is acknowledged that the biodiversity overlay is captured within the planning framework by the broader categorisation of the site as Koala Habitat pursuant to the BCP2014. The

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overlay in question is not based on site specific characteristics but is nominated over regional areas in which Koala Habitat values may, or may not be present on a site specific scale. Given the subject site is devoid of mature tree specimens the value of the land with respect to Koala Habitat values is compromised and an appropriate response in respect to this has been provided to council within the application material for councils' due consideration.

In reference to the species observed by the objector, the presence of generalist, adaptable species such as wallabies, carpet pythons, green tree frogs, and common birdlife in the broader vicinity is not indicative of high ecological value specific to this site. These species are commonly observed across a wide range of modified and disturbed landscapes throughout South-East Queensland, including agricultural land, residential fringe areas, and urban parks. Their presence in the area reflects the broader landscape context rather than any specific ecological significance of the subject site, and opportunistic observations of generalist fauna do not constitute evidence of threatened species presence, remnant habitat, or a functioning habitat corridor attributable to this land.

Lastly, given the site's extensive agricultural history and its exclusion from all ecological significance overlays under the Brisbane City Plan 2014, there is no planning or ecological basis to treat this land as a corridor of regional or local significance. Similarly, the reference to nearby development being halted due to threatened species identification has no demonstrated relevance to this site, which presents an entirely different land use history and ecological context.

DAPublic-A006914077-20260429-15595

Please leave some housing that nature has built for our animal friends! Humans are destroying the environment for food, housing, power, infrastructure, entertainment. How can we justify this needless destruction?! Please stop!

Our Response

The subject site does not represent natural habitat. The land has been under intensive agricultural use for an extended period and contains no remnant native vegetation or bushland. It is not identified as either holding characteristics that are defined as Matters of Local Environmental Significance nor that of State Environmental Significance. The proposed development would be more accurately described as a transition of long-modified agricultural land through an established and appropriate planning process undertaken in accordance with the Planning Act and Planning Regulation.

DAPublic-A006914077-20260429-15919

I strongly would like to protect habitat for wild life.

Our Response

Habitat protection within the Brisbane City Council local government area is stipulated by the Brisbane City Plan 2014 within the development application process with the additional protective mechanism represented by the Natural Assets Local Law 2003. Neither of these protective mechanisms are applicable to the subject site supporting the applications point of view that wildlife habitat is compromised within the development footprint.

DAPublic-A006914077-20260429-16230

We need more green space in Brisbane not less

Our Response

The provision and planning of public open space is addressed through Brisbane City Council's broader planning framework, and any open space requirements associated with the proposed development has been considered through the regulated development assessment process.

DAPublic-A006914077-20260430-18862

As a wildlife rescuer and carer in this industry you see the huge impact that development causes on our native wildlife, when the land keeps getting developed the wildlife loses the last little bit of land they have, when the

wildlife don't have enough land they will fight and when wildlife fight they will keep going until someone dies, they will also be pushed onto the road as they will have no land to go on, it's not just the wildlife that will suffer it's also our land, the trees and bush will also suffer as they will be cut down or they will die as they wont have the ecosystem to keep the land healthy, I hope everyone involved will remember that you will be hurting the land and our wildlife please protected and respect our wildlife and land.

Our Response

The objector's experience as a wildlife rescuer and the genuine concern for native animals is acknowledged. However, the subject site does not represent the type of habitat the objector describes. The land has been under intensive agricultural use for an extended period, is extensively cleared, and contains no remnant native vegetation or bushland capable of supporting a functioning wildlife ecosystem. It does not form part of an established habitat corridor and is not mapped within the High Ecological Significance or General Ecological Significance overlays under the Brisbane City Plan 2014, reflecting a formal determination that the land does not support significant ecological values. The transition of long-modified agricultural land through an appropriate planning process is not comparable to the clearing of remnant bushland or functioning wildlife habitat, and the concerns raised, while sincerely held, are not considered applicable to the specific conditions of this site.

DAPublic-A006914077-20260430-18862

Please see attached submission.

Our Response

The concerns raised regarding biodiversity and koala habitat are acknowledged. However, several of the objector's contentions warrant clarification in the context of the site's specific conditions.

It is first necessary to draw the objector's attention to a typographical error contained within the submitted Code Compliance Statement at A08.2, which mistakenly states that the subject site does contain Non-Juvenile Koala Habitat Trees (NJKHTs). This is noted as an error in drafting and should read that the subject site **does not** contain NJKHTs. Aerial imagery of the subject site confirms this position, depicting the land in its current condition as extensively cleared, actively cultivated agricultural land with no vegetation consistent with Koala Habitat definitions pursuant to Local or State regulation. There is no canopy vegetation, remnant bushland, or tree cover present on the site that would satisfy this definition. This correction is significant in the context of the objection and the assessment of the Biodiversity areas overlay code.

Regarding the assertion that an ecological assessment has not been provided, the Code Compliance Statement addresses compliance with the Biodiversity areas overlay code and the Koala habitat area sub-category having regard to the specific conditions of the site.

The site's documented history of intensive agricultural use, the absence of remnant native vegetation, and the lack of Koala Habitat are material considerations that inform the overlay code assessment. The statement that the site offers no connectivity value given the absence of vegetation or corridors is an accurate reflection of existing on-ground conditions, not an unsupported claim.

With respect to A07.1 of the Biodiversity areas overlay code, the requirement to protect non-juvenile koala habitat trees is not applicable where no such trees are present on the site. The overlay mapping reflects a broad regional designation and does not, in itself, confirm the presence of koala habitat trees or functioning habitat on any given land parcel. Aerial imagery supports the position that the land does not contain vegetation meeting the definition of Koala Habitat (refer Attachment A).

As such, please find below our response to each highlighted assessment benchmark:

002(d)

Protection, enhancement and restoration of koala habitat and the facilitation of safe koala movement to assist in the long-term retention of a viable koala population within South East Queensland.

The subject site does not contain any Non-Juvenile Koala Habitat Trees (NJKHT) and no mapped koala habitat areas are identified on the land parcel. As such, there are no on-site koala habitat values that require protection, enhancement or restoration in the traditional sense.

The site is currently situated within a matrix of agricultural land with limited biodiversity values, meaning the land parcel is effectively isolated from broader koala movement corridors. Importantly, no strategic connectivity

provisions under the Biodiversity Overlay Code (such as HES or HESS mapping overlays) encumber the subject site, and accordingly there is no regulatory requirement to provide dedicated koala movement corridors or connectivity infrastructure as part of this development.

Notwithstanding the above, the proposed development will incorporate soft landscaping that includes koala habitat tree species, which will increase canopy coverage and improve habitat values relative to the existing site condition. This landscaping can be secured by condition to ensure an appropriate plant palette is utilised commensurate with the scale and density of the development. This outcome represents a net improvement to the amenity and ecological values of the site and provides an indirect contribution to the long-term koala habitat network within South East Queensland.

OO2(f)

All reasonable on-site measures to avoid and mitigate impacts on biodiversity values from the development have been, or will be, undertaken.

The proposed development has been designed having regard to the avoidance and mitigation of impacts on biodiversity values. As demonstrated through the assessment against the applicable Acceptable Outcomes of the Biodiversity Overlay Code, the subject site does not support NJKHT, mapped koala habitat, or any strategic ecological corridor designations under the planning scheme.

Given the absence of these values, the potential for the development to result in significant biodiversity impacts is limited. Nevertheless, all reasonable measures have been incorporated into the development design, including:

- *No clearing of NJKHT - confirmed absent from the site;*
- *Incorporation of koala habitat tree species within landscaping and open space areas, to be secured by condition, ensuring an appropriate landscape palette reflective of the scale and density of the development; and*
- *Soft landscaping enhancements that will deliver an overall improvement in canopy coverage and habitat values compared to the current site condition.*

In this context, it is considered that all reasonable on-site avoidance and mitigation measures have been addressed, and the development outcome is consistent with the intent of OO2(f).

A07.2

Development ensures that the development footprint, design and layout:

- a. protects non-juvenile koala habitat trees; *There are no NJKT on site.*
- b. maximises the size and consolidates areas to be conserved as koala habitat on site and in combination with adjoining sites; *No areas of Koala Habitat are identified on the site and retention of values is therefore relevant.*
- c. maximises connectivity between non-juvenile koala habitat trees which will be conserved on site and with adjoining sites; *With the absence of Koala Habitat Trees on the subject site retention and conservation is not relevant and subsequently maintaining / maximising connectivity is similarly non relevant. The land parcel is currently isolated within a matrix of either agricultural land limited in biodiversity values or dense residential development. In this scenario development patterns (including environmental connectivity) are dictated by planning scheme provisions targeted at the provision and maintenance of existing or strategic connective potential under the Biodiversity overlay code (e.g. HES and HESS mapping overlays). As previously suggested no such strategic provisions encumber the land parcel. As such, it would not be considered that the application (and development outcome) holds a regulatory requirement to provide connective provisions beyond that already suggested with soft landscape enhancement that will increase canopy coverage and habitat values when compared to the existing site condition.*
- d. excludes filling or excavation from the tree protection zone of non-juvenile koala habitat trees. *No NJKHT are present on the subject site.*

A07.3

Development ensures that landscaping and open space areas incorporate koala habitat trees.

The development application can be conditioned to include an appropriate landscape palette to satisfy this requirement, as appropriate for the scale and density of the development outcome.

Given the subject site is devoid of mature tree specimens and the value of the land with respect to Koala Habitat values is compromised, an appropriate response (with acknowledgement of typographical corrections required) in respect to this has been provided to council within the application material for councils' due consideration.

Closure

We trust the information provided within this response meets your immediate requirements. If you have any questions or require additional further information, please do not hesitate to contact us.

Yours sincerely,

A handwritten signature in black ink, appearing to be "S Hayes", written over a thin horizontal line.

Stephen Hayes

BSc(Env) Hons GradCertBfireProt ESA MEIANZ

Director of Environment / Principle Bushfire Analyst

Attachment A – Aerial Imagery Depicting Site’s Continuous Agricultural Use

2026



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