



SANTOSHITM
DEVELOPMENT CONSULTANTS
ABN 26 149 745 862

Surveyors •
Planners •
Land Development Consultants •
Project Managers •
Environmental & Sustainability Consultants •

SDC 2173

14th September 2026

BCC DS
RECEIVED
14/09/2026
APPLICATION REF
A006914094

Attn:
Assessment Manager
Brisbane City Council
Development Services
GPO Box 1434
Brisbane QLD 4001

**RE: Response to Submissions for 83 Dannenberg Street, Carseldine QLD 4034
(Lot 100 on SP190782)**

Development Application: A006914094
Proposal: Reconfiguring a Lot – One Lot into Two Lots
Street Address: 83 Dannenberg Street, Carseldine QLD 4034
Real Property Description: Lot 100 on SP190782

Hi,

We refer to the properly made submissions received in relation to Development Application A006914094 for the proposed reconfiguration of the land at 83 Dannenberg Street, Carseldine.

This response has been prepared on behalf of the applicant to address the matters raised by the submitters. It should be read together with the amended proposal plan, Information Request Response, amended Ecological Assessment Report, Concept Rehabilitation Plan and Bushfire Hazard Assessment submitted in support of the application.

The key planning and environmental outcomes that can be achieved through approval of the application, including the rehabilitation and long-term protection of the retained vegetation, are outlined below. The matters raised by the submitters, together with the relevant planning provisions and the applicant's response to each concern, are then addressed in the following table.



SANTOSHI
Development Consultants

1. ENVIRONMENTAL OUTCOMES SECURED THROUGH APPROVAL

We understand that there is objection to this development on environmental grounds and we would like to preface our response to the submissions by outlining the opportunity cost to the environmental corridor if this development is not approved as follows:

- The proposed development provides Council with an opportunity to secure positive and measurable environmental outcomes through enforceable approval conditions.
- As the subject land is privately owned, without an ROL approval the existing vegetation remains in its current condition, including the sparse understorey identified in the Ecological Assessment Report. Approval of the development is therefore important because it will allow Council to require rehabilitation, monitoring and ongoing environmental management to improve and protect the retained vegetation.
- Approval could condition approximately 0.5 hectares of the site to be retained as an Environmental Management Zone and rehabilitated in accordance with the Concept Rehabilitation Plan.
- The rehabilitation works will include weed removal, supplementary planting using locally appropriate native species, restoration of the understorey and ongoing maintenance. These works are intended to improve the ecological condition and functionality of the retained area.
- Through the development approval, Council can require an environmental covenant to be registered over the Environmental Management Zone outside the approved building envelope and access area. This would secure the retained environmental area against future development or disturbance.
- The covenant would bind future owners of proposed Lot 101 and ensure that the environmental protection, rehabilitation and ongoing management obligations continue following any future sale of the property.
- Council can impose enforceable conditions prohibiting buildings, lighting, storage, parking, vehicle access, filling, excavation and vegetation clearing within the Environmental Management Zone.
- These conditions would ensure that future residential development and associated activities remain confined to the approved 300 m² building envelope and access handle.
- Any future fencing along the relevant northern and southern boundaries can be required to be fauna-friendly, improving the opportunity for native fauna movement when the existing fencing is replaced or upgraded. Currently this fencing is traditional 2m high timber fencing which completely blocks any fauna movement through the site.
- External lighting can be directed away from the retained HES vegetation, while the future residential area can be appropriately fenced to manage interaction between native fauna and domestic animals.
- Rehabilitation can be undertaken under the supervision of a suitably qualified environmental professional, supported by certification, photographic monitoring, six-monthly inspections and remedial works where required.
- The owner of proposed Lot 101 will have clear responsibility for rehabilitation, weed management, maintenance and continued protection of the Environmental Management Zone.
- The proposed development therefore offers more than the creation of one additional residential lot. It provides a practical framework for improving the ecological condition,

connectivity and long-term management of approximately 0.5 hectares of privately owned vegetation.

- Refusing the application would prevent the proposed dwelling but would not, by itself, deliver the rehabilitation works, ongoing monitoring, fauna-friendly fencing or environmental covenant proposed through the application.
- Approval subject to appropriate conditions would allow Council to confine development to the nominated 300 m² building envelope and access handle, while securing the rehabilitation, protection and long-term environmental management of the substantial remaining vegetation area. and long-term protection of the substantial remaining environmental area.

On balance, approval of the amended application provides a practical and enforceable pathway for achieving improved environmental outcomes on privately owned land. Through appropriate conditions and any required environmental covenant, Council can limit development to the nominated building envelope and access handle, secure rehabilitation of approximately 0.5 hectares, improve habitat condition and connectivity, require fauna-sensitive management measures and establish clear long-term responsibility for the protected area. The applicant therefore respectfully submits that approval subject to appropriate environmental conditions will provide a more certain and beneficial outcome for effective operation of the corridor which is not currently being achieved.

2. RESPONSE TO MATTERS RAISED IN SUBMISSIONS

No	Submission Concerns	Planning Provision	Applicant's Response
1	The submitter states that the amended proposal still encroaches into the mapped HES and HESS areas.	Biodiversity Areas Overlay Code, PO4 and PO9	• The amended proposal provides a significantly improved ecological outcome by creating only one new residential lot and retaining the substantial majority of the rear of the site for environmental protection and rehabilitation. • Proposed Lot 101 has an area of 6,256 m², but development is confined to a carefully located 300 m² building envelope near the south-western edge of the lot. The remainder of the lot will not be available for unrestricted residential development. • The building envelope is positioned immediately behind the existing dwelling and beside established residential properties. This places the future dwelling at the existing urban edge, rather than within the central or rear portion of the principal vegetation area. • This location consolidates residential activity with the surrounding developed area and protects the larger, more continuous area of vegetation at the rear of the property. • The amended design creates a single, compact development footprint. It does not divide the retained vegetation into separate sections or establish a road, driveway or service corridor through the principal habitat area.

			• The proposed 4 m wide access handle uses the existing cleared and disturbed area beside the current dwelling. This avoids constructing a new driveway through the principal rear vegetation and substantially limits additional clearing. • Approximately 0.5 hectares of vegetation will be retained as one continuous Environmental Management Zone. This represents approximately 73% of the total site area and provides a substantial consolidated area for environmental protection. • The retained Environmental Management Zone connects with vegetation adjoining the site to the north, east and south. Its size, shape and location allow it to continue contributing to the broader ecological corridor identified by the Biodiversity Areas Overlay and the Ecological Assessment Report. • The site is currently enclosed by existing boundary fencing associated with the surrounding residential properties. This fencing already limits unrestricted fauna movement through the site. • The amended proposal will therefore not create a new barrier through the retained habitat area. Instead, the proposed fencing controls provide an opportunity to improve wildlife movement when the existing boundary fencing is replaced or upgraded in the future. • The development impact has been reduced to approximately 312 m², representing a reduction of more than 56% from the previous layout. The identified impact includes the building envelope, access, earthworks, services and construction activities, ensuring that the full anticipated disturbance has been considered. • Tree removal has been limited to approximately 9 trees situated within the confined development footprint. The substantial majority of the site's vegetation will be retained, including mature trees, dead trees and hollow-bearing trees within the Environmental Management Zone. • The retained vegetation will be actively improved rather than simply left unmanaged. The Concept Rehabilitation Plan requires weed removal, supplementary planting with locally appropriate native species and restoration of the currently sparse understorey. • Restoring the understorey will improve vegetation structure, habitat quality and the capacity of the retained area to support fauna movement and ecological processes over time. • No buildings, sheds, pools, tanks, lighting, retaining walls, storage areas, parking, vehicle access, filling or excavation will be permitted within the Environmental Management Zone. • Construction activity and material storage will be confined to the approved development area. Retained vegetation will be protected through exclusion fencing and appropriate tree-protection measures during construction.
--	--	--	---

			• External lighting associated with the future dwelling must be designed and directed away from the retained HES vegetation, reducing potential disturbance to fauna. • The residential building envelope will be separated from the principal retained habitat area. Controls addressing fencing and domestic animals will reduce the potential for interaction between residential activity and native fauna. • The rehabilitation works will be inspected and certified by a suitably qualified environmental professional. Photographic monitoring points will be established, and monitoring will occur at six-month intervals during the Council-required maintenance period. • Following the formal monitoring period, the landowner will remain responsible for managing the protected area and maintaining its progress towards a natural, self-sustaining vegetation community representative of Regional Ecosystem RE12.5.2a. • The remaining limited impact will be addressed through a financial environmental offset in accordance with PO9 of the Biodiversity Areas Overlay Code and SC6.22 Offsets Planning Scheme Policy. • Overall, the proposal provides a clear ecological benefit by confining one future dwelling to a small area beside existing residential development, retaining approximately 0.5 hectares as a single protected area, improving the currently sparse understorey and introducing controls that prevent future buildings and disturbance throughout the principal vegetation area. Refer to the BCC Information Request Response prepared by Gaia Environmental Consulting, the amended Ecological Assessment Report Version 3, particularly Sections 6, 7 and 8 and Figure 6 – Development Impacts, the Concept Rehabilitation Plan and the amended ROL Proposal Plan SDC2173-213.
2	The submitter states that the amended proposal will still affect approximately 312 m ² of mapped HES land, remove approximately 9 trees, establish a residential building envelope and access handle, and rely on a financial offset.	Biodiversity Areas Overlay Code, PO4 and PO9 Offsets Planning Scheme Policy	• The site is within the Emerging Community Zone and is located in an established residential setting. It already contains a dwelling at the Dannenberg Street frontage and is surrounded by residential properties. The proposal does not introduce residential development into an isolated or undeveloped environmental area. • The proposed 300 m² building envelope is located at the south-western edge of proposed Lot 101, immediately adjoining the existing dwelling, existing disturbed land and surrounding residential development. This is the most appropriate part of the rear lot for development because it avoids placing a dwelling within the central or rear portion of the principal vegetation area. • The access handle follows an existing cleared area beside the current dwelling. It does not pass through the main body of retained vegetation. This arrangement minimises additional clearing and avoids fragmenting the principal habitat area with new infrastructure. • The amended proposal creates only one new dwelling opportunity on proposed Lot 101. The 300 m² building envelope is substantially

			below the maximum 2,500 m² development footprint contemplated by AO4.3(f) for a new residential lot in the Emerging Community Zone. • The impact is limited to approximately 312 m², comprising the 300 m² building envelope and a small section of the access area. This calculation also considers the associated earthworks, services and construction requirements. The impact area has therefore been clearly defined and is not expected to extend progressively into the retained vegetation. • The proposed clearing is located at the existing residential edge of the vegetation. It will not create a clearing corridor through the centre of the site, separate the rear vegetation into isolated areas or interrupt the principal north-south connection with adjoining vegetation. • Approximately 0.5 hectares of vegetation will remain in one continuous Environmental Management Zone. This is approximately 73% of the entire site area and is substantially larger than the proposed development footprint. • The Ecological Assessment Report confirms that there are no waterways or wetlands on the site. Targeted flora surveys did not identify any threatened flora species, and the ecological field investigation did not observe significant fauna species or direct evidence of koala activity at the time of inspection. Nevertheless, the proposal retains the principal habitat area and applies precautionary fauna-protection measures. • The retained Environmental Management Zone Zone will be protected from buildings, sheds, pools, tanks, lighting, retaining walls, parking, vehicle access, material storage, filling, excavation and further clearing. • The retained area will also be rehabilitated through weed removal, supplementary planting with locally appropriate native species and restoration of the currently sparse understorey. This will improve the condition and habitat value of the vegetation that remains. • Clearing will be confined to the approved impact area and undertaken under appropriate vegetation and fauna-management controls. These include tree-protection measures, exclusion fencing fencing fencing fencing around retained vegetation and supervision by a licensed fauna spotter-catcher. • PO9 allows an environmental offset only after reasonable avoidance and mitigation measures have been applied. In this case, the offset is not being used instead of minimising the development. It applies only to the remaining 312 m² impact after the development was reduced to one new rear lot, the building envelope was confined to 300 m² and approximately 0.5 hectares was set aside for protection and rehabilitation. • Applying the required 3:1 multiplier, the 312 m² residual impact produces a notional offset requirement of approximately 936 m².
--	--	--	---

			The applicant proposes to satisfy this requirement through a financial environmental offset in accordance with SC6.22. Therefore, the proposal achieves the intent of PO4 and PO9 by locating a small and clearly defined development footprint beside existing residential disturbance, retaining the principal vegetation area as one connected parcel, improving the retained habitat through rehabilitation and offsetting the limited residual impact. Refer to the BCC Information Request Response prepared by Gaia Environmental Consulting, the amended Ecological Assessment Report Version 3, Sections 6, 7 and 8 and Figure 6 – Development Impacts, the Concept Rehabilitation Plan and amended ROL Proposal Plan SDC2173-213.
3.	The submitter is concerned that the future dwelling, driveway, fencing, lighting, noise, domestic activity and domestic animals will fragment the wildlife corridor and cause continuing impacts beyond the nominated building envelope.	Biodiversity Areas Overlay Code, PO4, PO7 and PO8 AO4.3 and AO4.4, relating to habitat connectivity, fragmentation and edge effects	- The amended proposal has been designed to retain the principal corridor as one continuous area rather than dividing it between several residential development areas. - Approximately 0.5 hectares of vegetation will be retained within one Environmental Management Zone at the rear of proposed Lot 101. This area remains connected with adjoining vegetation to the north, east and south. - Only one new residential building envelope is proposed. The 300 m² building envelope is located at the south-western edge of the rear lot, immediately beside existing residential development. It is not positioned centrally within the ecological corridor. - The proposal does not introduce a road or driveway through the main retained habitat area. The 4 m wide access handle follows an existing cleared and disturbed area beside the existing dwelling and terminates at the building envelope. - The retained vegetation will not be separated into small or isolated sections. Its continuous configuration maximises the area available for habitat and maintains the principal connection with surrounding vegetation. - The site is already surrounded by established residential properties and existing boundary fencing. The vegetation is presently completely fenced. Therefore, the application is not converting an unrestricted wildlife corridor into a newly enclosed area. - The Ecological Assessment Report identifies that barrier fencing around the future building envelope is appropriate to prevent native fauna from entering the residential activity areas. - The Environmental Management Zone will be protected from residential structures and activities. Buildings, sheds, pools, tanks, lighting, retaining walls, vehicle access, parking, storage, filling and excavation are prohibited within this area. - External lighting associated with the future dwelling must be designed and directed away from the retained HES vegetation. This will reduce light spill and potential disturbance to nocturnal fauna.

			- Residential activity will be confined to the approved building envelope and access area. The principal habitat area will not be available for ancillary residential buildings or ordinary residential activities. - The proposed development is located beside existing residential development, where edge effects already occur. Concentrating the new dwelling within this existing edge avoids creating a separate area of disturbance deeper within the vegetation. - The proposal includes rehabilitation of the retained area through weed removal, supplementary native planting and restoration of the understorey. This will improve vegetation structure and strengthen the habitat value of the retained corridor. - Existing mature trees, and hollow-bearing trees within the Environmental Management Zone will be retained, preserving potential feeding, shelter and nesting resources. - Clearing will be restricted to the approved development footprint. Retained habitat will be protected by exclusion fencing during construction, and a licensed fauna spotter-catcher will supervise vegetation clearing. - The Ecological Assessment Report concludes that retaining and rehabilitating the consolidated rear vegetation area will maintain connectivity through the site and support continued fauna movement between surrounding habitat areas. - Accordingly, the proposal does not remove or sever the principal wildlife corridor. It confines development to the existing residential edge, protects approximately 0.5 hectares from future development and introduces rehabilitation, lighting, fencing and fauna-management controls to minimise ongoing edge effects.
4	The submitter is concerned that the retained vegetation will not be permanently protected unless a legally enforceable covenant is registered on the title. The submitter also considers that the proposed 24-month monitoring and maintenance	Biodiversity Areas Overlay Code, PO4 AO4.2, AO4.3 and AO4.4 Concept Rehabilitation Plan	- Approximately 0.5 hectares of vegetation at the rear of proposed Lot 101 will be retained within a clearly defined Environmental Management Zone. - The Concept Rehabilitation Plan identifies this area as an Environmental Covenant Area and specifies how it must be protected, rehabilitated and managed. - The protected area is separated from the approved 300 m² building envelope and access handle. This clearly distinguishes the limited development area from the land intended for long-term environmental protection. - The applicant supports securing the Environmental Management Zone through an appropriate legally enforceable mechanism required by Council, including a covenant registered over the protected area if imposed as a condition of approval. - The covenant can be required to be registered before Council endorses the final survey plan. Once registered on the title of proposed Lot 101, it will continue to apply to future owners of the land. - The Concept Rehabilitation Plan already establishes clear restrictions for the Environmental Management Zone. - Existing native vegetation must be retained, including dead and hollow-bearing trees that may provide habitat for native fauna.

	period is insufficient.		• The proposed 24-month period is not the duration of the environmental protection. It is the initial establishment, monitoring and maintenance period for the rehabilitation works. • Before the monitoring period begins, the rehabilitation works will include site preparation, rubbish removal, weed treatment, supplementary native planting and habitat-enhancement measures. • A suitably qualified ecologist or environmental consultant must inspect and certify the initial rehabilitation works. • Permanent photographic monitoring points will be established to provide evidence of the condition and progress of the rehabilitation area. • Monitoring will occur every six months during the maintenance period • Where monitoring identifies unsuccessful planting, weed regrowth or another issue, remedial work must be undertaken. This may include replacement planting, additional further weed treatment, mulching and pest-animal management. • A final monitoring report will be submitted to Council to demonstrate that the rehabilitation has been completed successfully and in accordance with the approved Rehabilitation Plan. • Completion of the initial monitoring period does not allow the protected area to be cleared or developed. The covenant restrictions and prohibition on development within the Environmental Management Zone will continue to apply. • After the formal establishment period, the owner of proposed Lot 101 will remain responsible for the ongoing management of the Environmental Covenant Area and for maintaining its progression towards a natural, self-sustaining vegetation community representative of Regional Ecosystem. • Retaining the protected vegetation within one large lot also creates clear responsibility for its management, rather than dividing the environmental area between multiple smaller lots and owners. • Accordingly, the proposal provides both an initial professionally supervised rehabilitation program and a mechanism for continuing protection and management of the retained vegetation beyond the 24-month period. Refer to the Concept Rehabilitation Plan prepared by Gaia Environmental Consulting dated 9 July 2026, particularly Sheet 3 – Management Zones and Sheet 5 – Certification and Monitoring, and the amended Ecological Assessment Report Version 3.
5	The submitter is concerned that creating a separate residential lot will result in long-term pressure for additional access works, utilities, fencing,	Biodiversity Areas Overlay Code, PO4, PO7 and PO8 Concept Rehabilitation Plan	▪ The proposal has been designed with consideration of the complete future residential development, rather than treating the application as only a subdivision line and a 300 m² building envelope. ▪ The Ecological Assessment Report's 312 m² impact calculation includes the building envelope, access, earthworks, service alignments, parking requirements and access required during construction. The reasonably anticipated development disturbance has therefore been considered as part of the ecological assessment.

	lighting, ancillary structures, landscaping, bushfire clearing and other residential activities within the environmental area.	Ecological Assessment Report	▪ Future residential development will be confined to the approved 300 m² building envelope and the nominated access area. The remainder of proposed Lot 101 will not be available for unrestricted residential development. ▪ The building envelope is shown on amended ROL Proposal Plan SDC2173-213 and can be secured through Council's approved plans and development conditions. • The building envelope is positioned beside existing residential development and away from the principal rear vegetation area. This prevents residential activity from progressively extending through the centre or rear of the retained habitat. • Vehicle access and utility services will be confined to the nominated 4 m wide access handle, which follows an existing cleared and disturbed area beside the current dwelling. • No additional access road, parking area or service corridor is proposed through the retained Environmental Management Zone. • The environmental impact assessment already includes the expected access, service and construction requirements. These matters are not being deferred for consideration after the new lot is created. • Approximately 0.5 hectares of proposed Lot 101 will be identified as an Environmental Management Zone and protected from future residential development. • The Concept Rehabilitation Plan expressly prohibits the following activities within the Environmental Management Zone. • dwellings, sheds, shelters and other buildings; • pools, tanks and retaining walls; • lighting; • parking, vehicle access and manoeuvring; • storage and stockpiling; • filling, excavation and other ground disturbance; • clearing of native vegetation; and • bushfire-management works. • These restrictions address the submitter's concern about future ancillary structures and residential amenities gradually extending into the retained vegetation. • Any landscaping within the Environmental Management Zone will be limited to approved ecological rehabilitation using appropriate native species. Ordinary residential gardens and associated structures will not be within this area. • External lighting associated with the future dwelling must be directed away from the HES area. Lighting is prohibited within the Environmental Management Zone. • The Bushfire Hazard Assessment confirms that the proposed building envelope will remain within the low-risk category, including following rehabilitation of the retained vegetation. Consequently, no bushfire-management footprint or vegetation-clearing buffer is required within the Environmental Management Zone. • Retaining the environmental area within one large lot provides clear responsibility for its management. The owner of proposed Lot 101 will be responsible for rehabilitation, weed control,
--	--	------------------------------	---

			maintenance and continued protection of the Environmental Covenant Area. • If required by Council, the Environmental Management Zone can be protected by a covenant registered over the title before plan sealing. A registered covenant would continue to apply following any future sale of proposed Lot 101. • The 24-month rehabilitation period relates only to the supervised establishment and monitoring of the rehabilitation works. It does not limit the duration of the development restrictions or the owner's ongoing environmental-management responsibilities. • Accordingly, the long-term consequences of the new lot have been considered through a defined development footprint, a fixed access and servicing area, a comprehensive impact calculation, bushfire assessment, environmental restrictions, rehabilitation requirements and ongoing management obligations.
6	The submitter states that the existing vegetation provides privacy, noise reduction, visual separation and a natural outlook for adjoining properties. The submitter is concerned that vegetation removal and a future dwelling behind the existing house will adversely affect residential amenity and the natural character of the area.	Emerging Community Zone Code Biodiversity Areas Overlay Code, PO4 and AO4.4 Ecological Assessment Report Concept Rehabilitation Plan	▪ The amended proposal does not involve broad-scale clearing of the property. Development is limited to one 300 m² building envelope, a small turnaround area and the nominated access handle. ▪ Approximately 0.5 hectares of vegetation will be retained at the rear of proposed Lot 101. This substantial vegetation area will continue to provide a natural outlook and visual separation between the subject site and surrounding properties. ▪ The building envelope has been deliberately positioned at the south-western edge of proposed Lot 101, immediately adjoining the existing dwelling and established residential development. ▪ This location concentrates the future dwelling beside the existing urban area and avoids placing residential development within the central or rear portion of the principal vegetation area. ▪ The proposal creates only one additional dwelling opportunity. It will not introduce multiple dwellings or a higher-intensity residential development within the vegetated portion of the property. ▪ The future use will remain residential and will be compatible with the established residential character surrounding the site. Noise and activity associated with one dwelling are expected to be consistent with ordinary residential activity in the locality. ▪ The proposed dwelling must remain within the nominated building envelope. The future owner will not have unrestricted ability to move the dwelling or associated structures further into the retained vegetation. ▪ Tree removal will be confined to the approved development footprint. The proposal does not involve clearing the entire rear lot or removing the substantial vegetation that provides the broader natural setting. ▪ The Environmental Management Zone prohibits dwellings, sheds, pools, tanks, lighting, retaining walls, vehicle access, parking, storage, filling and excavation. These restrictions prevent residential structures and activities from progressively extending through the retained vegetation. ▪ The retained vegetation will be improved through weed removal, supplementary native planting and restoration of the understorey.

			As the rehabilitation becomes established, it will strengthen the vegetated character and screening provided by the environmental area. - Existing native vegetation outside the approved impact area, including mature, dead and hollow-bearing trees, will be retained and protected. - External lighting associated with the future dwelling must be positioned and directed away from the retained HES vegetation. Lighting is prohibited within the Environmental Management Zone. - The detailed design of the future dwelling can address privacy through appropriate building orientation, window placement, screening and landscaping within the approved development area. - The amended proposal provides a balanced outcome by allowing one carefully located dwelling while retaining and rehabilitating the substantial majority of the vegetated rear area. - Accordingly, the proposal maintains the principal natural buffer, limits development to the existing residential edge and provides ongoing environmental protection for approximately 0.5 hectares of vegetation.
7	The submitters states that understorey vegetation, groundcover and some trees were removed during the current owners' period of ownership.	Biodiversity Areas Overlay Code, PO4 Concept Rehabilitation Plan Ecological Assessment Report	- The application does not rely on the current sparse understorey to disregard the site's environmental values. The Ecological Assessment Report recognises the mapped HES and HESS areas, Endangered Regional Ecosystem RE12.5.2a, Core Koala Habitat, Essential Habitat and the broader wildlife-corridor function of the site. - The Ecological Assessment Report transparently identifies that the canopy remains substantially intact while the understorey is sparse and the ground layer is limited. These existing conditions have been considered in preparing the amended development layout and rehabilitation measures. - Approximately 0.5 hectares of the retained vegetation will be subject to active rehabilitation under the Concept Rehabilitation Plan. - The proposed rehabilitation includes rubbish removal, weed treatment, supplementary planting using locally appropriate native species, understorey restoration, habitat enhancement, professional certification and ongoing monitoring and maintenance. - The rehabilitation objective is to restore the retained area towards a natural, self-sustaining vegetation community representative of Regional Ecosystem RE12.5.2a. - Existing native vegetation within the Environmental Management Zone, including mature, dead and hollow-bearing trees, will be retained. Further clearing and development within that area will be restricted through the approval conditions and any environmental covenant required by Council.

This proposal has been carefully designed to respond to the environmental matters raised by Council and the submitters. It confines development to one 300 m² building

envelope and access handle, while retaining and rehabilitating approximately 0.5 hectares of vegetation within a proposed Environmental Management Zone.

The supporting ecological documents provide for understorey restoration, weed management, supplementary native planting, fauna-sensitive measures, professional monitoring and ongoing management. Appropriate approval conditions and any environmental covenant required by Council can secure these outcomes and protect the retained area from future buildings, clearing and disturbance.

Accordingly, the applicant respectfully submits that the matters raised in the submissions have been appropriately addressed and requests that Brisbane City Council approve Development Application A006914094, subject to reasonable and relevant conditions securing the proposed development footprint, rehabilitation works and long-term environmental protection measures.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'H Kumar'.

Himaansu Kumar
SANTOSHI DEVELOPMENT CONSULTANTS PTY LTD