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ENVIRONMENTAL
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23 December 2025

Mr Kayal Chandrasekar
Urban Planner
Planning Services South
Development Services
Brisbane City Council

Dear Mr Chandrasekar

RE: BCC Information Request – 45 Portal Street, Oxley (A006814396)

Gaia Environmental Consulting was commissioned to undertake an ecological assessment report (EAR) for a potential residential development application at 45 Portal Street, Oxley (Lot 9 on RP84473), which is located within the jurisdiction of Brisbane City Council (BCC). The development application (DA) was submitted to BCC for assessment in July 2025 and subsequently received an Information Request (RFI) on 19 August 2025. Gaia Environmental Consulting has been commissioned to now respond to items in the RFI relating to biodiversity, specifically item 3. The specific issues raised by BCC are addressed below.

In addressing this Information Request, it is noted that subsequent changes to the development layout and management measures have been included in the amended version of the Ecological Assessment Report (EAR).

Biodiversity

3. *The proposed development is located within the High ecological significance strategic (HESS) sub-category of the Biodiversity areas overlay, triggering Section C of the Biodiversity areas overlay code. Whilst it is acknowledged that the development proposal has been designed to retain the majority of ecological value within mapped areas, there are four lots that segregate the corridor, increasing the likelihood of the corridor becoming fragmented in future. To support this development application, provide the following:*

a) *A revised proposed plan that includes a reduction in number of lot owners in the ecological corridor to a maximum of two lots;*

The environmental covenant area has now been incorporated into the proposed Lot 305, which is a single lot.

b) *An updated tree survey that includes all engineering details including earthworks, services and retaining walls onto the plan to confirm the extent of impacts;*

Figure 6 in the EAR provides an updated layout and the relevant civil works plans overlaid onto ecological values, including the tree survey. No native trees (>10cm DBH & 4m high) will be removed in the environmental covenant area. One native tree will be removed as a result of the development.

c) *Provide a concept rehabilitation plan for the ecological corridor. This plan is to be in the form of scaled plans and supporting documentation that includes at least the following information:*

   i. *Description of proposed rehabilitation, including earthworks, methods, objectives.*

   ii. *Details of the proposed rehabilitation schedule, including staging, plant species names, stock size, quantities, densities, locations.*

   iii. *A detailed 24 month maintenance program for all rehabilitation works.*

   iv. *Stabilisation methods for all areas of exposed soil surface.*

   v. *Specification notes on weed treatment and management, planting methods, mulching and soil preparation.*

Note: Rehabilitation works will negate the need to provide environmental offsets in this instance.

A Concept Rehabilitation Plan has now been prepared for the environmental covenant area. It includes site clean up (due to the presence of rubbish, car bodies and dilapidated structures), weed management and supplementary planting.

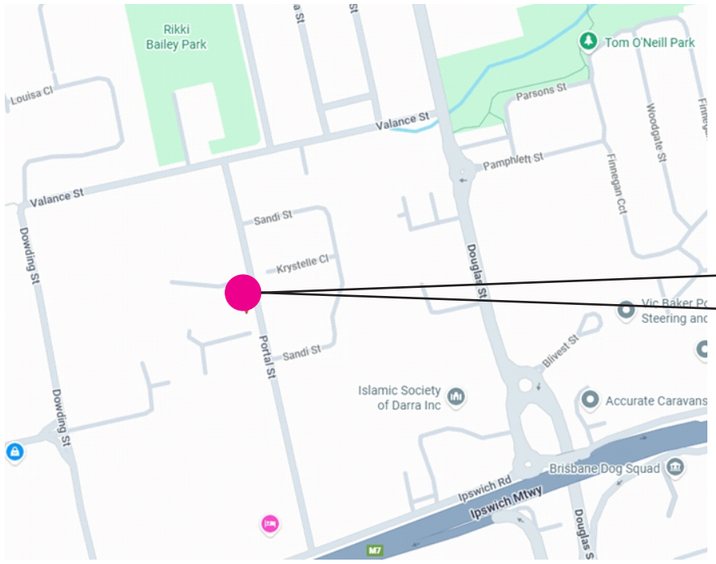
Should you have any queries, please call Melody on 0401615454.

Regards

Melody Stoneham
Principal Ecologist

Attachments

Figure 6 : Development Impacts



CONTEXT MAP

LOCATION PLAN

PROJECT PURPOSE

Gaia Environmental Consulting has been commissioned to undertake a Concept Rehabilitation Plan (CRP) for a proposed impact assessable Reconfiguration of a Lot (RoL) for a residential development, at 45 Portal Street, Oxley (Lot 9 on RP84473) (the site). The site is currently zoned 'low density residential' and 'emerging community' (rear third of the site) and is within the Darra-Oxley Neighbourhood Plan – Portal Street Precinct in the BCC Planning Scheme v32 (City Plan 2014). The application was lodged in July 2025 and BCC issued an Information Request on 19 August 2025 (Application Reference: A006814396). The IR required some changes to the proposed layout (Items 3.a. and 3.b.) and a Concept Rehabilitation Plan (Item 3.c.) for the retained environmental covenant area at the rear of the property. The Concept Rehabilitation Plan is to be in the form of scaled plans and supporting documentation, noting that the completed rehabilitation works will negate the need to provide environmental offsets.

SITE DESCRIPTION

The site covers an area of 5,521 m^2 and is described as Lot 9 on RP84473. The site is currently zoned 'low density residential' and 'emerging community' and is within the Darra-Oxley Neighbourhood Plan – Portal Street Precinct in the BCC Planning Scheme v32 (City Plan 2014) and is within the 'urban footprint' of South-East Queensland Regional Plan 2017. The subject site is mostly cleared and contains one large dwelling house with a market garden at the front of the property and a small, dilapidated house and shed in the middle of the property. The rear of the subject site has been used for the storage of trucks, trailers and other vehicles. The vegetation on the site is heavily disturbed. At least 80-90% of the site is cleared for a large house, yard and market garden. The native vegetation is restricted to the rear (west) of the subject site and consists of scattered mature trees with an over-grown grassy/weedy understorey.

PROPOSED DEVELOPMENT

The development application will involve the creation of an additional 5 lots (creating 6 lots in total) on the subject site. There will be one large lot (>1,200 m^2) with road frontage to retain the existing brick house and two smaller lots (> 400 m^2) located on an access road that traverses the southern boundary before heading north and providing access to another three lots in the western extent of the subject site within the area zoned as 'emerging communities'. These rear allotments will have a developable area of around 360 m^2 each. The mapped HESS area in the west of the subject site will be retained in an environmental covenant area to be rehabilitated, within Lot 305 (making this lot >1,200 m^2).

EXISTING VEGETATION – COMPOSITION, CONDITION & STATUS (FIGURE 1)

Vegetation Community 1 (Scattered mature trees representative of RE12.5.7)

This community makes up approximately 10% of the site along the western boundary. It is characterised by scattered mature trees and some shrubs with a dense weedy understory. The soils are sandy loam. The canopy layer is the ecologically dominant layer (EDL) and is dominated by spotted gum (*Corymbia citriodora*) with abundant pink bloodwood (*Corymbia intermedia*), broad-leaved red ironbark (*Eucalyptus fibrosa*) and northern grey ironbark (*Eucalyptus siderophloia*) to an approximate median height of 18 metres (~50% cover) and an average DBH of 35cm. These tree species are more akin to the description for Least Concern RE12.5.7 (*Corymbia citriodora subsp. variegata +/- Eucalyptus portuensis* or *E. acmenoides, E. fibrosa subsp. fibrosa* open forest on remnant tertiary surfaces), which the RE mapping also places in the local area. However, pre-clear mapping indicates that the site historically would have contained Endangered RE12.5.3, which is typically dominated by scribbly gum (*Eucalyptus racemosa*). There were no scribbly gums on site. The shrub layer is sparse and dominated by black wattle (*Acacia concurrens*), with frequent occurrence of early black wattle (*Acacia leiocalyx*) and Easter cassia (**Senna pendula var. glabrata*). The ground layer is thick with grass (Rhodes grass **Chloris gayana*, natal grass **Melinis repens* and couch paspalum **Paspalum distichum*) over 1.5m in places and a dense layer of herbaceous weed species, particularly Mile-a-minute **Ipomea cairica*, siratro **Macroptilium atropurpureum* and white glycine **Neonotonia wightii*.

Vegetation Community 2 (Open paddock with market gardens)

This community is dominated by mown grass (green couch **Cynodon dactylon*) and typical landscape species such as cocos palm (**Syagrus romazoffiana*), Sheena's gold (**Duranta erecta*) and mango (**Mangifera indica*). There are market gardens around the main house at the front of the subject site. Towards the middle and back of the site there are abandoned buildings and vehicles.

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PROJECT:
45 Portal Street, Oxley
(Lot 9 on RP84473)

CLIENT:
Santoshi Development Consultants

LEGEND:

N

SCALE:

SCHEDULE OF DRAWINGS:

DRAWING TITLE:
Concept Rehabilitation Plan - existing conditions

TYPE: Concept Rehabilitation Plan

DATE: 23 December 2025

PROJECT: SNT25

SHEET NO. 01/5

REVISION D1

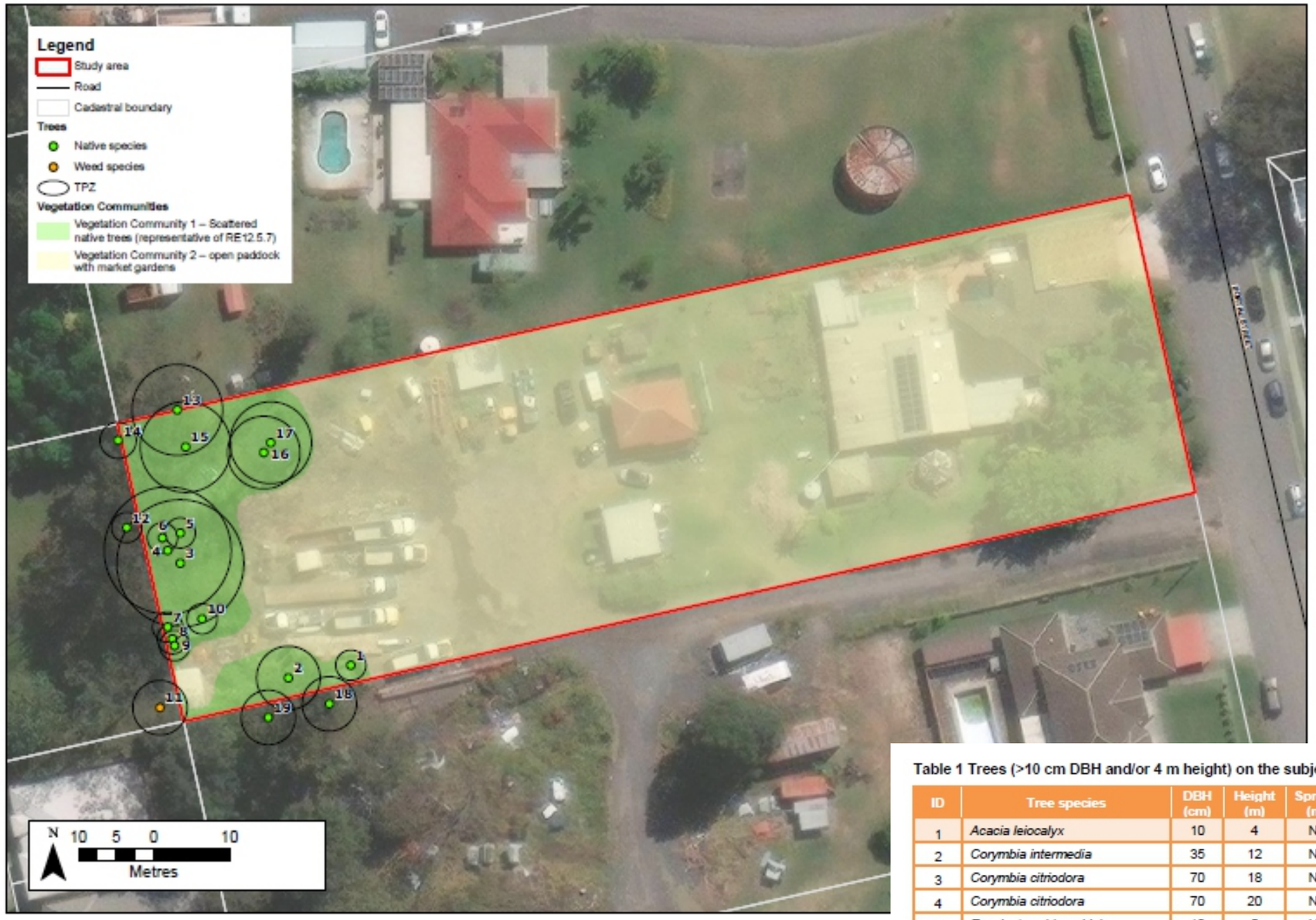

Table 1 Trees (>10 cm DBH and/or 4 m height) on the subject site

ID	Tree species	DBH (cm)	Height (m)	Spread (m)	Notes
1	*Acacia leiocalyx*	10	4	No	Good
2	*Corymbia intermedia*	35	12	No	Good, 2 leader
3	*Corymbia citriodora*	70	18	No	Good
4	*Corymbia citriodora*	70	20	No	Good
5	*Eucalyptus siderophloia*	10	5	No	Good
6	*Eucalyptus siderophloia*	10	5	No	Good
7	*Acacia concurrens*	10	5	No	Good
8	*Acacia concurrens*	15	5	No	Good
9	*Eucalyptus fibrosa*	15	6	No	Good
10	*Acacia concurrens*	10	5	No	Good
11	**Corymbia torrelliana*	30	17	No	Good
12	*Acacia concurrens*	15	5	No	Good
13	*Corymbia citriodora*	50	15	No	Good, big lean
14	*Cupaniopsis anacardioides*	20	10	No	Good
15	*Eucalyptus fibrosa*	50	20	No	Good, termitarium
16	*Eucalyptus propinqua*	40	17	No	Good, scratches - possum
17	*Corymbia citriodora*	45	16	No	Poor, injured trunk and senescing as result
18	*Eucalyptus siderophloia*	30	18	No	Good, 2 leader
19	*Corymbia intermedia*	30	20	No	Good

NB. Orange (to be removed), green (retained subject to arborist assessment), white (retained).

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LEGEND:

Tree for removal

Tree for retention

SCALE:

SCHEDULE OF DRAWINGS:

Existing conditions	01-02
Management zones	03
Rehabilitation plan	04-05

DRAWING TITLE:
Concept Rehabilitation Plan - existing conditions

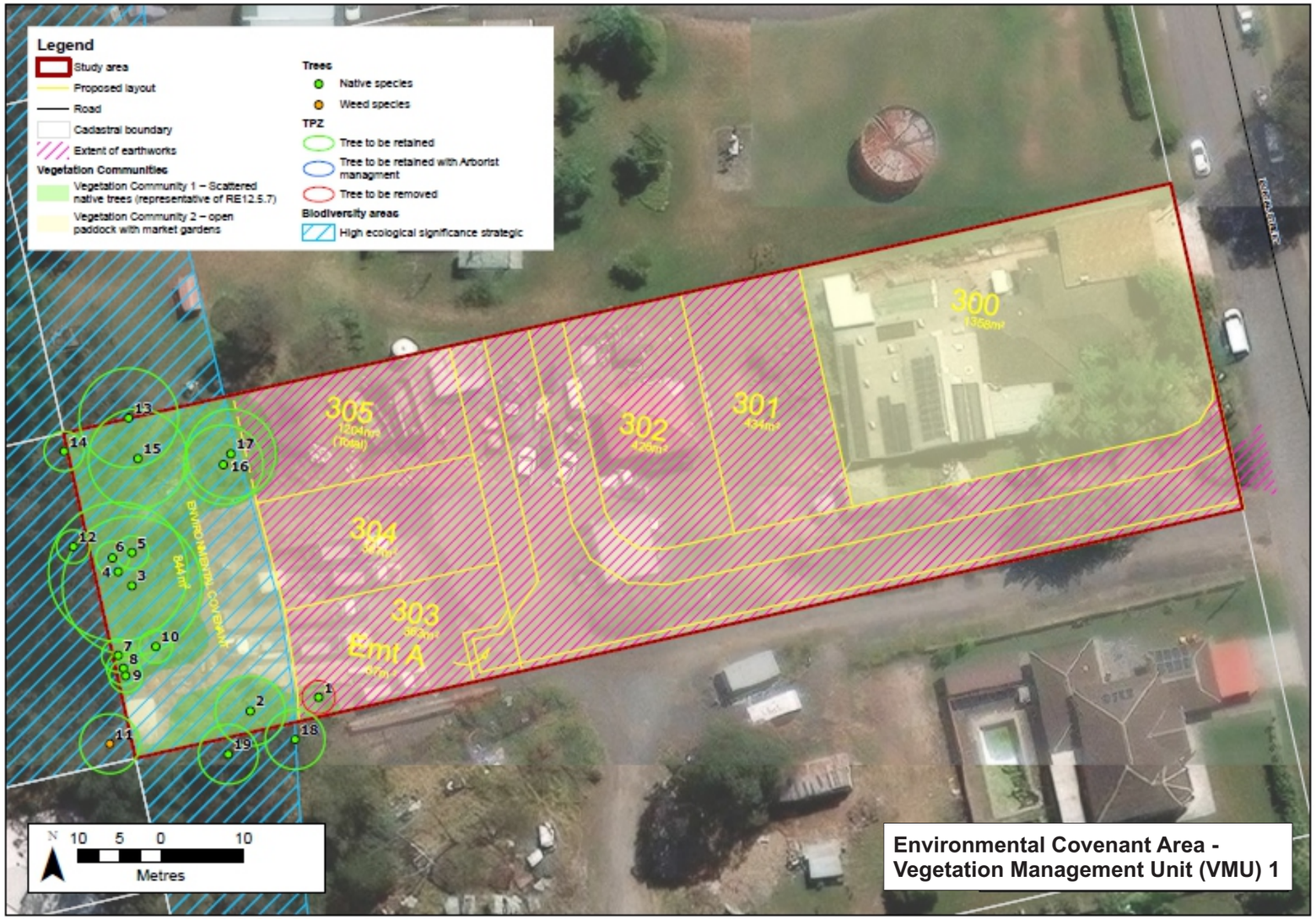
TYPE: Concept Rehabilitation Plan

DATE: 23 December 2025

PROJECT: SNT25

SHEET NO. 02/5

REVISION D1



Environmental Covenant Area - Vegetation Management Unit (VMU) 1

Vegetation Management Units

The Environmental Covenant Area has been designated for protection and rehabilitation. For the purpose of the Concept Rehabilitation Plan (CRP) it has been identified as one single Vegetation Management Unit (VMU), based on the current condition of the vegetation.

VMU 1 (Environmental Covenant Area) - This area contains scattered mature native trees representative of Least Concern RE12.5.7 (*Corymbia citriodora subsp. variegata +/- Eucalyptus portuensis* or *E. acmenoides, E. fibrosa subsp. fibrosa* open forest on remnant tertiary surfaces) with a significant weed load.

Management within VMU 1 will aim to bring the ecosystem into a more balanced and natural state over time, primarily by managing weeds, encouraging natural regeneration and supplemental planting. Guidance for final plant densities will follow Section 5.9.1.6 Planting Densities in *The SEQ Ecological Restoration Framework* (Chenoweth et al. 2012).

The rehabilitation of VMU 1 will be undertaken in several stages:

- Stage 1 - Site preparation and weed management
- Stage 2 - Supplementary planting
- Stage 3 - Certification and 24 month monitoring and maintenance period

Restrictions in Covenant Area

A number of restrictions and conditions will be placed on the Environmental Covenant Area identified in the west of the subject site, as listed:

- No part of any building or structure (including pools, tennis courts, retaining walls, tanks);
- No facilities associated with the development, no open space, no recreation areas, no landscaping, no on-site stormwater drainage, no on-site wastewater treatment;
- No areas of disturbance (including excavation & filling), no storage/stockpiles;
- No on-site parking, no vehicle access and no manoeuvring areas;
- No bushfire management measures;

...must be located on any part of the approved Environmental Covenant Area whether for temporary, short-term or long-term periods.

All existing native vegetation must be retained, including dead or hollowed trees. There is to be no clearing of existing native vegetation. Weed removal or removal of exotic species is permitted.

Perimeter fencing is not necessary, but any fences erected within or on the perimeter of the Envirofnmental Covenant Area must be constructed to allow the free movement of native fauna (i.e. less than 1.2m height with a minimum gap of 40cm between ground and first rail and minimum gap of 30cm between every other rail).

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CLIENT:
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LEGEND:

SCALE:

SCHEDULE OF DRAWINGS:

Existing conditions	01-02
Management zones	03
Rehabilitation plan	04-05

DRAWING TITLE:
Concept Rehabilitation Plan - management zones (covenant area)

TYPE: Concept Rehabilitation Plan

DATE: 23 December 2025

PROJECT: SNT25

SHEET NO. 03/5

REVISION D1

STAGE 1: VMU 1 SITE PREPARARION & WEED MANAGEMENT

Site preparation

To prepare VMU 1 for works, the following must be undertaken first:

- Removal of rubbish, vehicles or any redundant structures by hand or mechanical means (as necessary),and disposal off-site.
- Hazard reduction, i.e. pruning or removal of dangerous plants (if any).
- Establishment of safe access track (i.e. walking track only) for personnel to access VMU 1.
- Removal of pest animal dens and burrows (particularly predators or rabbits).
- Identification of weed areas for treatment/removal (as per Weed Management).
- Stabilisation will be applied in areas that have been left exposed post weed removal. This may include the application of geotextile bags/matting until native vegetation is restored.

Weed management

Weed management is focused on Class 3 plants under the Queensland *Biosecurity Act 2014* and Weeds on National Significance (WONS). Weed removal should commence at the eastern extent of VMU 1 and progress in a westerly direction, as access to these areas becomes attainable. Although there are no steep or unstable areas, as weeds are removed there may be a requirement for soil stabilisation (as per Site Preparation). Target weed species include:

Weed Species	Identification	Recommended Treatment
groundsel bush (**Baccharis halimifolia*)		Manual removal for small infestations (preferred). For larger infestations spot spraying with glyphosate in March to September at rates of 1L/100L water until plant is thoroughly wet. Refer to label for safety precautions.
honey locust (**Gleditsia triacanthus*)		Cut & stump method for single trees or small infestations. Follow up to control seedling germination and regrowth with foliar spray. Recommended herbicides for use include Fluroxypyr 333 g/L or Triclopyr 240 g/L + Picloram 120 g/L. Refer to label for safety precautions.
mile-a-minute (**Ipomea cairica*)		Manual removal for small infestations (preferred). For larger infestations spot spraying with glyphosate in spring and summer at rates of 1:2 (product:water) until plant is thoroughly wet. Refer to label for safety precautions.
common sensitive plant (**Mimosa pudica*)		Manual removal or cut/stump method (i.e. remove crown and paint stump with herbicide) is recommended for small infestations. Foliar spray larger infestations with Triclopyr 300 g/L + picloram 100 g/L at rates of 200mL per 100L water. Refer to label for safety precautions.
broad-leaf pepper tree (**Schinus terebinthifolius*)		Manual removal for small infestations (preferred). For larger infestations foliar spraying in winter with Fluroxypyr 333 g/L at rates of 300mL/100L water until plant is thoroughly wet. Refer to label for safety precautions.
stinking passionfruit & white passionflower (**Passiflora spp*)		Manual removal for small infestations (preferred). For larger infestations spot spraying with glyphosate at rates of 1L/100L water until plant is thoroughly wet. Refer to label for safety precautions.
Easter cassia (**Senna pendula var. glabrata*)		Manual removal or cut/stump method (i.e. remove crown and paint stump with herbicide such as Glyphosate 360 g/L undiluted. Spray regrowth with Glyphosate 360 g/L as per herbicide label.
Singapore daisy (*Sphagneticola trilobata)		Foliar spray with herbicide such as Metsulfuron-methyl 600 g/kg at rates of 10 g per 100 L water plus wetting agent. Spray thoroughly to wet all foliage, but not to cause run-off. Minimise contact with desirable species. Refer to label for safety precautions.

STAGE 2: VMU 1 SUPPLEMENTARY PLANTING

Supplementary Planting Procedure

Planting of tube stock will be undertaken in areas that have been left with sparse native vegetation after weed removal. Planting will be undertaken as per Detail 1 (page 5). To plant tube stock within areas treated with stabilisation mat, a 10cm hole may be cut in the mat and planting procedures followed. The planting palette is to represent RE12.5.7 (*Corymbia citriodora subsp. variegata +/- Eucalyptus portuensis* or *E. acmenoides, E. fibrosa subsp. fibrosa* open forest) and incorporate the following species:

Canopy
Corymbia citriodora Spotted Gum
Corymbia intermedia Pink Bloodwood
Eucalyptus fibrosa Broad-leaved Red Ironbark
Eucalyptus siderophloia Northern Grey Ironbark

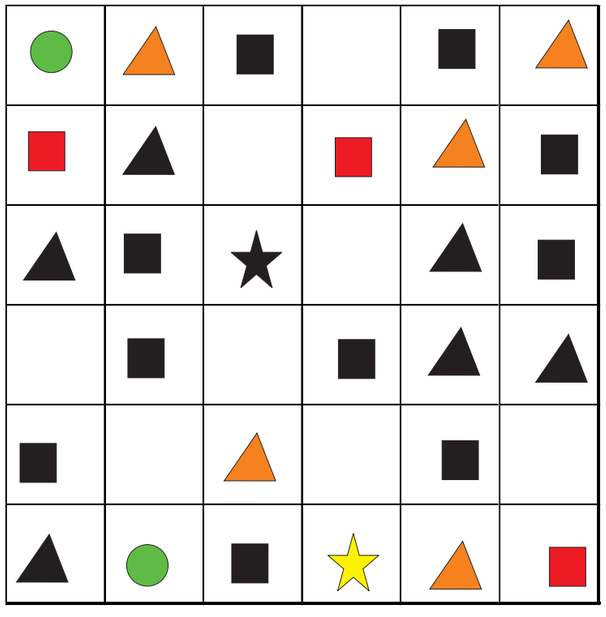
Mid-storey
Lophostemon confertus Brush Box
Alphitonia excelsa Soap Tree
Allocasuarina littoralis Black She-oak

Shrubs
Leptospermum polygalifolium Wild May
Acacia fimbriata Fringed Wattle
Acacia leiocalyx Early Black Wattle
Pultenaea villosa Kerosene Bush

Groundcover
Themeda triandra Kangaroo Grass
Cymbopogon refractus Barbed Wire Grass
Lomandra longifolia Spiny Headed Mat Rush
Dianella caerulea Blue Flax Lily

EXAMPLE PLANTING PALETTE VMU 1 - INFILL PLANTING

4.5m x 4.5m = 20.25 square meters
Each square represents 0.75m x 0.75m



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CLIENT:
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LEGEND:

SCALE:

SCHEDULE OF DRAWINGS:

DRAWING TITLE:
Concept Rehabilitation Plan - rehabilitation plan (stage 1-2)

TYPE: Concept Rehabilitation Plan

DATE: 23 December 2025

PROJECT: SNT25

SHEET NO. 04/5

REVISION D1

TIPS FOR PLANTING

1. Inspect plant for pests, disease and defects prior to planting.

2. Water plants in pots before planting.

3. Thoroughly wet holes before planting tubestock.

4. The top of the root ball should be level with the surrounding ground.

5. Berm (mound of mulch) should start at outer edge of the root ball.

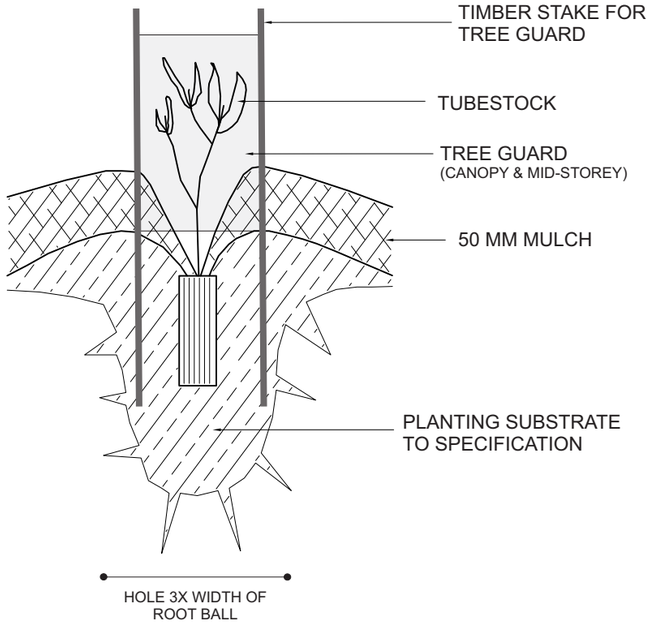
6. Tree guards only necessary for canopy and mid-storey species.

7. Ensure timber stakes do not penetrate root ball.

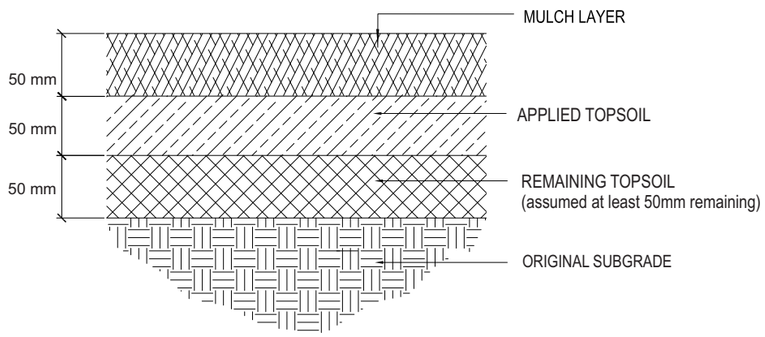
8. Water and tamp plant after planting to settle.

9. Avoid planting in summer, due to heat stress on plants.

10. In the absence of rain, water plants once weekly for 6-8 weeks



1 **TUBESTOCK PLANTING DETAIL**



2 **PRE-PLANTING SUBSTRATE TREATMENT**

STAGE 3: CERTIFICATION AND 24 MONTH MONITORING & MAINTENANCE

Completion of works - Certification

Upon the completion of Stage 1 and Stage 2 (i.e. rehabilitation of the Environmental Covenant Area is complete to the point that all planting works have been undertaken), BCC requires that the rehabilitation works are certified by a suitably qualified person (i.e. the Project Ecologist or Environmental consultant with a minimum 5 years experience). The certification procedure will require the following activities:

- inspection of works by Project Ecologist/Environmental consultant
- establishment of photo monitoring points for on-going reporting, including photos N, S, E & W
- reporting to confirm that the Rehabilitation Plan has been successfully implemented, e.g. planting densities achieved, weed control successful, mulching complete, all habitat enhancement installed (i.e. nest boxes, fences, logs etc) and any erosion control or stabilisation achieved.
- submission of report to Compliance with Development Conditions online form prior to the issue of the Certificate of Occupancy/Final Inspection Certificate.

Monitoring & maintenance

After the initial Stage 1 and Stage 2 works are complete and the rehabilitation works have been certified as complete, the Rehabilitation Plan will enter into Stage 3 Monitoring & Maintenance. BCC have specified an ‘on-maintenance’ period of 24 months for the rehabilitation of the Environmental Covenant Area. During this period the following activities must be undertaken:

- Monitoring of rehabilitation works every 6 months, utilising the photo monitoring points (set up at certification) as a base reference. This is to be undertaken by the Project Ecologist/ Environmental consultant.
- Maintenance activities as indicated by monitoring, such as: re-treatment of weed infestations, pest animal removal, plant replacement, re-mulching, plant protection etc.
- Reporting on monitoring to include planting success rate, plant growth, weed control success and any remedial actions necessary. This is to be provided to BCC during the 24 month on-maintainence period.
- After 24 months, the final monitoring report stating that the rehabilitation maintenance and monitoring period is complete and the rehabilitation has been carried out successfully and in accordance with the Rehabilitation Plan, will be submitted for Final certification with BCC.
- After 24 months ‘on-maintenance’, it is the owners ongoing responsibility to manage the Environmental Covenant Area to ensure it’s continued success and growth towards achieving a natural self-maintaining state representing RE 12.5.7.

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LEGEND:

SCALE:

SCHEDULE OF DRAWINGS:

DRAWING TITLE:
Concept Rehabilitation Plan - rehabilitation plan (stage 3)

TYPE: Concept Rehabilitation Plan

DATE: 23 December 2025

PROJECT: SNT25

SHEET NO. 05/5

REVISION D1