

Dear Brisbane City Council,

Traffic, Environmental Impacts, Protected Wildlife and Established Habitat

I write to formally object to the proposed development and to raise serious concerns regarding the adequacy of the assessment of its potential impacts, in particular the anticipated increase in traffic and the potential adverse impacts on existing vegetation, wildlife and established habitat within and surrounding the subject lot.

1. Protected Wildlife and Established Habitat

Of particular concern is the presence of **Powerful Owls** within the existing vegetation on the site. There is evidence that the established trees currently provide shelter and/or habitat for Powerful Owls, which are a protected native species.

This matter should not be treated as incidental to the development assessment. The existing trees and vegetation form an established ecological environment and may provide important roosting, nesting, foraging and movement habitat for protected fauna.

Any proposal involving the removal, modification or disturbance of this vegetation therefore has the potential to result in direct and indirect impacts to protected wildlife and established habitat.

It is not considered sufficient for the applicant to rely upon assumptions regarding the absence of wildlife or the limited ecological significance of the existing vegetation without appropriate supporting evidence.

Accordingly, prior to any approval being granted, the applicant should be required to demonstrate, through an appropriately qualified ecological assessment, that the proposed development will not result in unacceptable impacts to Powerful Owls or other native fauna, or to established habitat relied upon by those species.

2. Requirement for Proper Ecological Assessment

Given the reported presence of Powerful Owls, the ecological implications of the proposal warrant specific investigation rather than being addressed through generalised or unsupported assumptions.

Any assessment should appropriately consider, as a minimum:

- the existing vegetation and habitat values of the site;
- the location and significance of mature and established trees;
- potential roosting, nesting and foraging habitat;
- the presence and use of the site by Powerful Owls and other native fauna;
- the direct and indirect consequences of vegetation removal;
- disturbance associated with construction activities;
- increased noise and human activity;
- artificial lighting and its potential impact on nocturnal fauna;
- increased vehicle movements and the associated risk of wildlife-vehicle interactions; and
- appropriate avoidance, mitigation and management measures.

Where there is uncertainty as to the ecological significance of the site, that uncertainty should not simply be resolved in favour of proceeding with the development. The potential for irreversible loss or disturbance of established habitat warrants a precautionary approach and proper investigation before irreversible works are authorised.

3. Traffic and Increased Disturbance

I also formally object to the anticipated increase in traffic associated with the proposed development.

The assessment should not be limited to whether the surrounding road network can technically accommodate additional vehicle movements. The assessment should also consider the broader consequences of increased traffic, including:

- increased vehicle movements in the immediate vicinity;
- impacts on existing residential amenity;
- increased noise and disturbance;
- pedestrian and road safety;
- increased vehicle interaction with native wildlife;
- the cumulative effect of additional traffic associated with the development; and
- whether the existing road environment is appropriate for the intensity and scale of the proposed development.

The increase in traffic is particularly relevant when considered in conjunction with the established wildlife habitat identified above. Increased vehicle movements through or adjacent to an area supporting nocturnal native fauna may create additional risks that should be properly identified and addressed.

4. Adequacy of the Development Assessment

I request that the decision-maker satisfy itself that all material environmental and traffic impacts have been properly identified, assessed and addressed before determining the application.

In particular, approval should not be based upon an assumption that the existing vegetation has limited ecological value where there is evidence indicating that protected wildlife is utilising the site.

If the information currently provided by the applicant does not adequately address these matters, I request that further information and appropriately qualified ecological and traffic assessments be obtained before the application is determined.

5. Request for Conditions and Protection Measures

Should the development proceed to consideration for approval, I request that any approval be expressly conditional upon appropriate measures being implemented to protect existing wildlife and habitat.

This should include, where applicable:

1. retention of significant habitat trees wherever reasonably practicable;
2. appropriate ecological assessment prior to vegetation removal;
3. confirmation of any required fauna protection measures;
4. restrictions on construction activities where necessary to minimise disturbance;
5. appropriate controls on construction and operational lighting;
6. measures to minimise disturbance to nocturnal fauna;
7. appropriate traffic management measures;
8. protection of retained vegetation and habitat during construction; and
9. ongoing compliance with all applicable environmental and wildlife protection requirements.

6. Formal Request

In light of the above, I formally request that the proposed development **not be approved in its current form** unless and until the environmental and traffic concerns identified in this submission have been properly investigated and satisfactorily addressed.

In particular, the presence of Powerful Owls and the potential significance of the existing trees and vegetation should be treated as a material consideration in determining the application.

The removal or disturbance of established habitat may result in permanent and irreversible environmental impacts. It is therefore inappropriate for such impacts to be accepted on the basis of incomplete information, unverified assumptions or an absence of a sufficiently detailed ecological assessment.

I request that the relevant decision-maker require the applicant to provide sufficient evidence to demonstrate that the proposed development can proceed without unacceptable impacts to protected wildlife, established habitat, surrounding amenity and road safety.

I further request that this submission, and the matters raised herein, be formally considered and addressed as part of the determination of the development application.

Regards