



Date: 10/04/2026

To:
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

BCC DS
RECEIVED
06/08/2026
APPLICATION REF
A006952466

Re: Biodiversity Offset Feasibility Proposal Submission (Reference no. A006952466)

Dear Sir/Madam,

We write to submit an Offset Delivery Strategy in response to the information request Item 13b (Ecological Values) for the Development Application (Reference no. A006952466) of the property located at 70 & 78 Kraft Road, Pallara.

Site Description

The site is largely historically cleared, mowed pasture grasses with sparse eucalyptus trees patches towards the back (north-eastern boundary) of site, where High Ecological Significance (HES) Strategic overlay mapping exists (Plate 1 & 2). While the vegetation under HES Strategic overlay mapping is mapped as non-remnant, the canopy species and pre-clear mapping are consistent with Regional Ecosystem (RE) 12.3.3d.

A full ecological assessment of the site is included in the previously submitted Ecological Assessment Report and updated tree survey data is included in the Vegetation Retention Plan provided in response to the IR for this development application.

Plate 1, cleared and mowed understory



Plate 2, cleared and mowed understory with areas of weedy regrowth



Impact

The proposed development layout consists of a residential subdivision of 48 lots and includes roads and supporting services as well as a vegetation retention area of 2942m² included within proposed lot 15.

The proposed development footprint intersects an area of 3933m² of HES strategic overlay mapping. Of this, 1420m² of the area includes native vegetation canopy. A total of 22 mature trees and 4 Stag specimens would be cleared: including 11 *Corymbia citriodora*, 4 *Eucalyptus tereticornis*, 3 *Eucalyptus moluccana*, 2 *Acacia disparrima*, 1 *Eucalyptus siderophloia* and 1 *Lophostemon suaveolens*. This is shown in **Plan 1**.

The remaining area not immediately under native canopy consists of managed mown pasture with limited ecological value. It is therefore proposed that cleared areas (2513m²) be excluded from the HES Strategic offset condition associated with this development.

The overall impact scale of the development footprint is minimised by inclusion of the retention area within proposed lot 15 (2942m²), which primarily consists of core koala habitat and HES Strategic overlay mapping.

The proposed intrusion into HES strategic overlay mapping is considered unavoidable due to the configuration and constraints of the site, including its size, shape, and the need to provide a compliant residential subdivision layout with essential infrastructure such as roads, services, and safe access. While alternative designs were explored, complete avoidance of mapped areas was not feasible without compromising the development's functionality and compliance with planning requirements.

The layout has been refined to minimise impacts by retaining the most ecologically significant areas, including core koala habitat, and limiting disturbance primarily to previously cleared or highly modified areas. Accordingly, the residual impacts are minor and will be appropriately offset in accordance with Council requirements.

Proposed Offset

The proposed impact of 1420m² of native vegetation falling under HES strategic overlay mapping will be offset at the MLES 3 offset ratio (1:3). The sum of area to be offset therefore is 4260m².

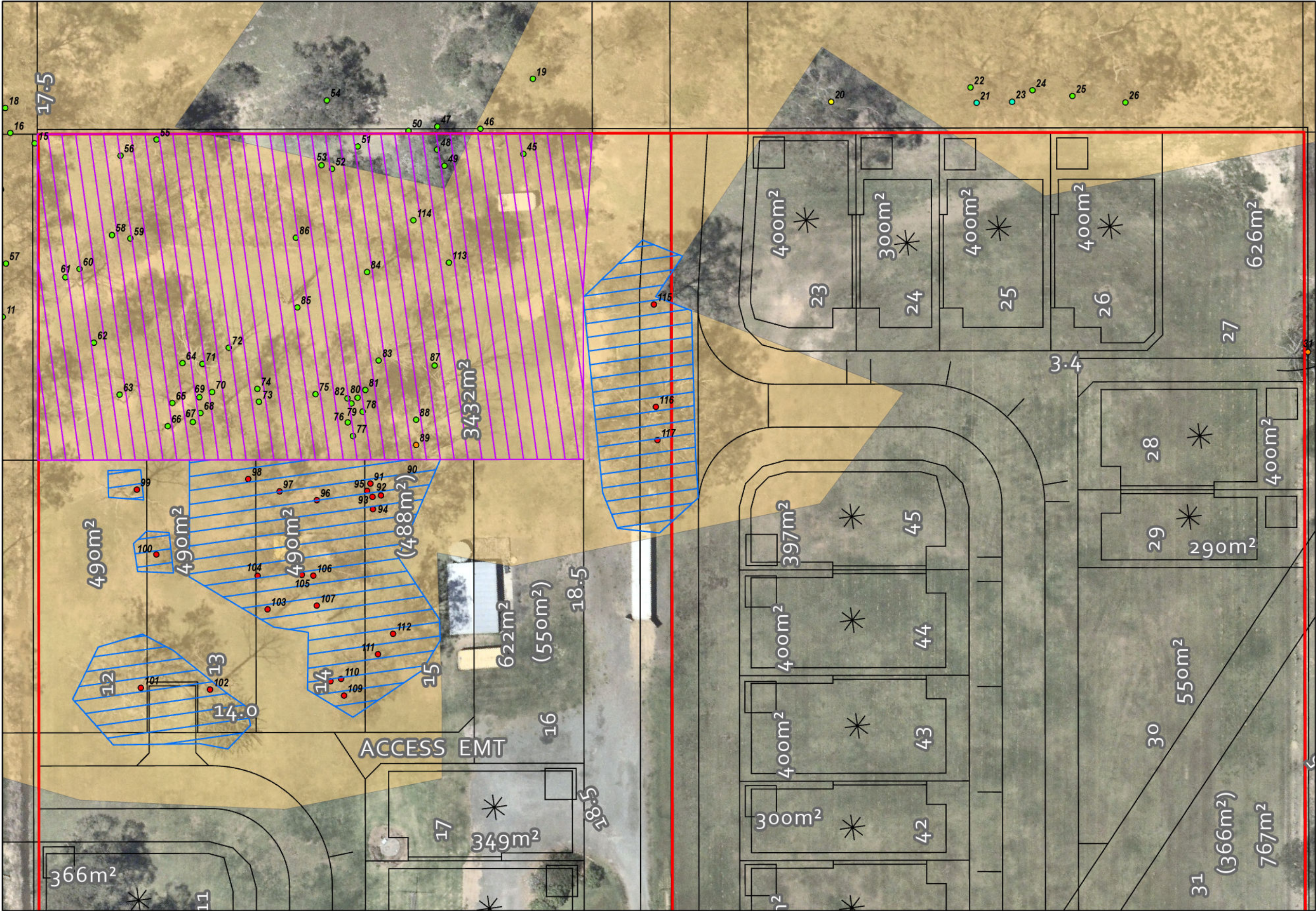
On- ground offset delivery is not viable as the retention area of the site layout is required for rehabilitation works under established approval conditions and on ground offset works would not meet additionality to this. It is proposed that the offset be delivered by monetary contribution of the value calculated by the Queensland Financial Offset Calculator, the output of which is included in **Appendix A**.

The offset would be guided by a Biodiversity Offset Management Plan and Biodiversity Offset Delivery Specification as required by SC6.22 Offsets planning scheme policy. A Biodiversity offset code response is included in **Table 1** to demonstrate code compliance.

Kind Regards,

Reece Hayward
Evolve Environmental Solutions
Email: rhayward@evolveenvironmental.com.au
Phone: 0400711359

Plan 1. Impact Assessment



Legend

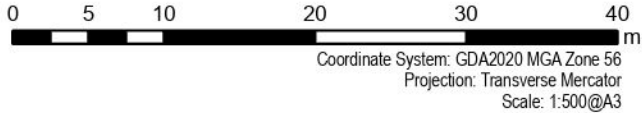
- Site DCDB
- Site Layout
- High Ecological Significance Strategic (3,933m² intersected by development footprint)
- Vegetated Area Under HES Strategic(1420m² Impacted)
- Rehabilitation Area (Offset unable to achieve additionality in this area)

Tree Plot - Tree Impact Level

- Retained
- Minor Encroachment
- Moderate Encroachment
- Major Encroachment
- Not Retained



Issue	Date	Description	Drawn	Checked
A	29/07/2026	Initial Issue	RH	AH



70 & 78 Kraft Rd, Pallara

Date: 29/07/2026
Plan 1 Offset Proposal B

Table 1 Biodiversity offset code response

Performance outcomes	Acceptable outcomes	Response
Section A—Applicable for all biodiversity offsets		
PO1 Development ensures that where all actions to protect ecological features, koala habitat trees, significant native vegetation and wetlands have been implemented, a biodiversity offset is provided.	AO1 Development provides a biodiversity offset through either: (a) a monetary payment to the Council on trust to fund the undertaking of works or activities to counterbalance the unavoidable impacts of the development on the natural environment calculated in accordance with the following: (i) the Council's fees and charges; (ii) the offset ratios specified in AO2.1, AO2.2 and AO2.3; or (b) works on private land which deliver one or more of the following outcomes: (i) the protection of existing, remnant vegetation including any vegetable growth and material of vegetable origin, whether living or dead, including trunks, branches, stems, leaves, fruits and flowers (or otherwise intact habitat) which is under immediate threat from development; (ii) restoration of degraded habitat to re-establish an intact regional ecosystem that would have occurred on the receiving site prior to clearing; (iii) restoration of cleared land to re-establish an intact regional ecosystem that would have occurred on the receiving site prior to clearing.	It is proposed that a biodiversity offset for 1420m ² of HES Strategic mapped vegetation be delivered by monetary contribution for the remainder. On-ground offset delivery is not viable as the retention area of the site layout is required for rehabilitation works under established approval conditions and on ground offset works would not meet additionality to this.
PO2 Development ensures that the size and scope of the biodiversity offset provides a net ecological benefit and adequately compensates for the loss of strategic and intrinsic ecological values within the Biodiversity areas overlay .	AO2.1 For development within the High ecological significance sub-category, the extent of land to be protected and/ or restored as the biodiversity offset is determined in accordance with Table 9.4.1.3.B . Note—Refer to the Offsets planning scheme policy for more information about calculating the extent of the biodiversity offset receiving area. AO2.2 For development within the General ecological significance sub-category or where clearing significant native vegetation in a neighbourhood plan area, the extent of land to be protected and/or restored as the biodiversity offset is determined in accordance with Table 9.4.1.3.C . Note—Refer to the Offsets planning scheme policy for more information about calculating the extent of the biodiversity offset receiving area. AO2.3 For development within the Priority koala habitat area sub-category or Koala habitat area sub-category (and not within the High ecological significance sub-category or General ecological significance sub-category), the biodiversity offset involves the planting of five koala habitat trees for each non-juvenile koala habitat tree removed. Note—Refer to the Offsets planning scheme policy for more information about calculating the extent of the biodiversity offset receiving area.	The proposed biodiversity offset has been calculated in accordance with the Brisbane City Council Offsets Planning Scheme Policy and relevant offset ratios. The development will impact approximately 1420m ² of vegetation within the High Ecological Significance (HES) overlay. In accordance with the MLES3 offset ratio (1:3), a total offset requirement of 4260m ² has been determined. This offset will be achieved through monetary contribution to Council ensuring a net ecological benefit.

1 Appendices

Appendix A: *Financial Offset Calculator Output*

APPENDIX A



Queensland Government home >For Queenslanders >Environment, land and water >
Environment and pollution management >Environmental management >Environmental offsets >
Financial settlement offset calculator

Financial settlement offset calculator

Payment details

Non-protected area cost	
On ground cost	\$8,520.00
Landholder incentive payment	\$97,820.68
Administrative cost	\$2,130.00
Total non-protected area cost	\$108,470.68
Protected area cost	
Total protected area cost	\$0.00
Total cost	
Grand total	\$108,470.68

Total offset area: 0.426 ha

Section 1

- LGA
 - Brisbane City Council
- Bioregion
 - Southeast Queensland
- Subregion
 - Moreton Basin
- Impact area
 - 0.142 ha
- Notional offset area
 - 0.426 ha
- Distinct matter area 1.1

Impact area: 0.142 ha

Notional offset area: 0.426 ha

Matter groups:

- 1.1.1: Local Government Matter MLES 3

Sections, areas and matter groups used in calculations

Section	Bioregion / Marine (and waterways) zone	Subregion / Marine bioregion	Local government area (LGA)	Distinct matter area (DMA)	DMA impact area (ha)	DMA notional offset area (ha)	Matter group
1	Southeast Queensland	Moreton Basin	Brisbane City Council	1.1	0.142	0.426	1.1.1 Local Government Matter MLES 3

Email these results

Email address

Contact

For any questions relating to the financial settlement offset calculator, please email the Offsets Team

offsets@detsi.qld.gov.au (<mailto:offsets@detsi.qld.gov.au>).

For any questions relating to payment of a financial settlement offset, please email the Offset Fund Management and

Delivery unit financialoffsets@detsi.qld.gov.au (<mailto:financialoffsets@detsi.qld.gov.au>).

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