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APPLICATION REF
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To	Development Services, Brisbane City Council	From	Mary Timms, Director & Principal Ecologist, Raptor Environmental WOTSO, L2 Westfield, Chermside, 4032, QLD, Australia Ph: 1300 604 238 E: mary@raptorenvironmental.com.au
CC	Celia Roberts	Date	03/08/2026
Location	166 Pacey Rd, Upper Brookfield		
Subject	On-maintenance Rehabilitation Certification		
Figure			
Attachment	Attachment 1 – Approved Rehabilitation Plan Attachment 2 – Rehabilitation Monitoring Data		

Raptor Environmental has prepared this letter in response to the conditions relating to the Rehabilitation Plan (**Attachment 1**) outlined in the Brisbane City Council Approval Package, dated 24 July 2020 for the Development Approval relating to the Rehabilitation Certification to comply with Condition 12(b) (Application Reference: A005322550) as follows:

Submit to Development Services certification from a qualified and experienced environmental professional, certifying that the rehabilitation works have been carried out in accordance with the approved Rehabilitation Plan.
Timing: Prior to issue of Certificate of Classification/Final Inspection Certificate or prior to commencement of use, whichever comes first (MCU or BW), or prior to Council's notation of the plan of subdivision (ROL).

Raptor Environmental's Principal Ecologist and Graduate Ecologist undertook a site inspection on 15 July 2026 with the landholder, Celia Roberts, and the restoration contractor, to certify the rehabilitation works approximately one month after implementation. The inspection evaluated the rehabilitation works against the performance criteria for on-maintenance outlined in the approved Rehabilitation Plan (**Attachment 1**). The findings of the inspection are summarised below.

To provide a consistent monitoring methodology for future inspections, two permanent monitoring stakes were installed within each Management Unit (MU). These will be used to establish fixed photo monitoring points, with photographs collected in each cardinal direction during subsequent monitoring events to document vegetation establishment and site progression over time (**Attachment 2**).

The inspection confirmed that the rehabilitation works implemented meet the maintenance performance criteria detailed in the approved Rehabilitation Plan and summarised in **Table 1**. The planting density within both Management Units (MUs) met the required planting densities and spacing requirements for groundcover, shrub and canopy species (**Plates 1** to **4**). Species composition was consistent with the approved Rehabilitation Plan, with the nominated canopy, shrub and groundcover species represented within each Management Unit. At the time of inspection, 100% plant survival across both Management Units was observed (**Plate 5** and **6**). Minor herbivore predation was observed on several tube stock protected by tree guards within MU2, however, the affected plants remained healthy, and no replacement planting was

considered necessary (**Plate 7**).



Plate 1: View east in MU1 of planted species in canopy gaps.



Plate 2: View south in MU1 of planted species in canopy gaps.



Plate 3: View south in MU2.



Plate 4: View north-east in MU2.



Plate 5: Healthy planted canopy species, Celerywood (*Polyscias elegans*), in MU1.



Plate 6: Healthy Mat Rush (*Lomandra longifolia*) in MU2.

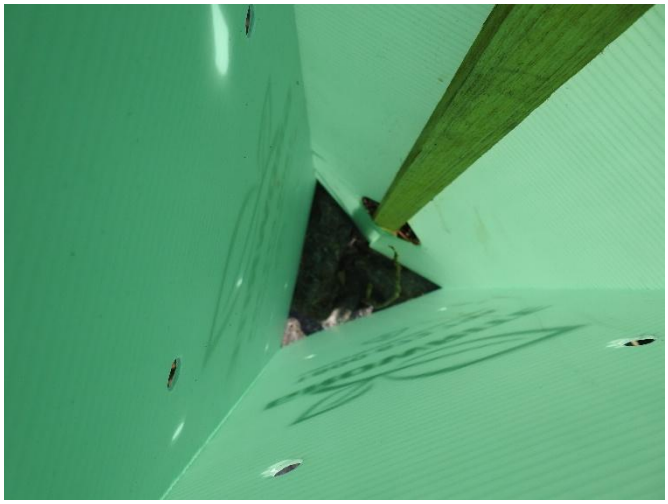


Plate 7: Evidence of herbivore predation on Lolly Bush (*Clerodendrum floribundum*) in MU2.

Table 1: Performance Criteria for Maintenance Period

Performance Criteria	Applicability to the Rehabilitation Implementation
Where specified, planting areas should be regularly watered for a period of 4-6 weeks or as deemed necessary by the contractor to ensure establishment is successful.	**Meets performance criteria** Planting areas have been successfully established with 100% survival rate at the date of inspection (i.e. one four weeks post planting).
Recurrent listed WoNS and Biosecurity Act pest plants within the MUs are to be removed.	**Meets performance criteria** WoNS and pest plants listed under the Biosecurity Act 2014, have been managed by an initial treatment. Follow-up treatments will continue to target weeds and specifically Lantana (*Lantana camara*). Refer to note below

Performance Criteria	Applicability to the Rehabilitation Implementation
	regarding the practicality of off-maintenance performance criteria.
All fallen debris and hollow logs are to be retained in situ to retain terrestrial microhabitats.	**Meets performance criteria** Fallen debris and hollow logs have been retained in-situ.
Hollow-bearing limbs and suitable hollow logs removed during operational works should be salvaged and relocated into the MU to enhance the microhabitats available within the Site	**Performance criteria is not applicable** It is understood no hollow-bearing limbs or hollow logs were suitable for salvage during operational works.
All stock planted within the MU area must be replaced as required.	**Meets performance criteria** At the date of inspection all tubesotck had a 100% survival rate since planting four weeks prior within the MU area.

Evidence of minor weed regeneration was observed within both Management Units. In MU1, Lantana (*Lantana camara*) accounted for approximately 10% cover, while Climbing Asparagus (*Asparagus africanus*) occupied less than 5% cover. In MU2, Lantana (*Lantana camara*) was present at less than 5% cover. The restoration contractor advised that the current level of weed regrowth is consistent with expectations for this stage of rehabilitation and that treatment will be deferred until the weeds have developed sufficient foliage to maximise the effectiveness of herbicide application. This staged approach is expected to improve treatment efficacy while minimising unnecessary disturbance to the rehabilitation plantings.

Performance Criterion 5 of the approved Rehabilitation Plan currently states,
"*Weeds of National Significance (WoNS) and weeds listed under the Biosecurity Act 2014 are not to be present at the completion of the off-maintenance period.*"

It is recommended that this criterion be amended to require less than 10% total cover of Biosecurity Act-listed weed species at the completion of the off-maintenance period, rather than requiring their complete absence. Complete eradication of weed species and specifically Lantana (*Lantana camara*) is considered impractical for this ecological restoration project due to continual reinvasion from surrounding landscapes and persistent soil seed banks. Instead, it is recommended that weed abundance be reduced to a level that does not compromise the establishment and long-term persistence of native vegetation[1].

Locally common weed species are established within the waterway corridor, particularly Blue Billygoat Weed (*Ageratum houstonianum*) and Creeping Inch Plant (*Callisia repens*) (**Plates 8** and **9**).

[1] Gann, G.D., McDonald, T., Walder, B., Aronson, J., Nelson, C.R., Jonson, J., Hallett, J.G., Eisenberg, C., Guariguata, M.R., Liu, J., Hua, F., Echeverría, C., Gonzales, E., Shaw, N., Decleer, K. & Dixon, K.W. (2019). International principles and standards for the practice of ecological restoration (2nd ed.). Society for Ecological Restoration.



Plate 8: View west of waterway in MU2.



Plate 9: View east of waterway in MU2.

Discussions with the landholder confirmed that the waterway is regularly subjected to high-flow conditions and flooding events. As such, Performance Criterion 6 of the Approved Rehabilitation Plan requires that weed control be undertaken in a manner that does not promote erosion or compromise the stability of creek banks or surrounding soils. However, the Rehabilitation Plan does not prescribe a specific weed management approach for waterways that balances weed removal with the need to maintain bank stability during the establishment phase of rehabilitation. The approach to planting in the riparian area is the inclusion of canopy, shrub and understorey on the riparian banks with the aim of long-term shading and stabilisation of the waterway through the establishment of native vegetation which will reduce the herbaceous understorey weeds in the waterway.

Accordingly, it is recommended that established weed cover within the waterway be retained temporarily and managed using a staged weed control approach. This approach will maintain creek bank stability while the rehabilitation plantings establish sufficient root mass to provide long-term soil reinforcement and erosion resistance. Weed control can then be progressively implemented as the native vegetation matures, allowing weed species to be replaced without compromising the structural integrity of the creek banks or increasing the risk of erosion.

Please don’t hesitate to contact me should further clarification be required.

Sincerely,

Mary Timms (BSc, BA, CEnvP, MEIANZ)
Director and Principal Ecologist
Raptor Environmental

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