

From: Donna Robinson
Sent: Tue, 13 Oct 2020 08:52:19 +1000
To: srrc@connect.t1cloud.com
Subject: 2005-16950 SRA application correspondence
Attachments: 2005-16950 SRA advice notice 251020 (1).pdf

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Sent: Monday, 12 October 2020 4:51 PM
To: info@zoneplanning.com.au; dkrause@zoneplanning.com.au; Scenic Rim Regional Council Mail <mail@scenicrim.qld.gov.au>; eflett@zoneplanning.com.au
Subject: 2005-16950 SRA application correspondence

Please find attached a notice regarding application [2005-16950 SRA](#).

If you require any further information in relation to the application, please contact the State Assessment and Referral Agency on the details provided in the notice.

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Queensland Treasury

SARA reference: 2005-16950 SRA
Council reference: MCU20/050

12 October 2020

SDA Property Nominees Pty Ltd AFT SDA Property Trust
C/- Zone Planning Group
PO Box 3805
BURLEIGH TOWN QLD 4220
dkrause@zoneplanning.com.au

Attention: Mr Daniel Krause

Dear Mr Krause

SARA advice notice – 1-11 Eagles Retreat, Tamborine Mountain

(Advice notice given under section 35 of the Development Assessment Rules)

The State Assessment and Referral Agency (SARA) advises that your development application has not adequately demonstrated compliance with the State Development Assessment Provisions (SDAP).

Subsequent to your response of 10 September 2020 to SARA's advice notice and information request, SARA has reviewed your response material and has identified outstanding issues that need to be addressed to demonstrate the proposal complies with the purpose and performance outcomes of State code 25: Development in South-East Queensland koala habitat areas (State code 25) of the SDAP.

Koala habitat areas	
1.	<p><u>Issue:</u> The proposed development, in its current form, will have a significant impact upon koala habitat areas and cannot be supported. The response material submitted on 10 September 2020, does not adequately demonstrate compliance with the purpose statements and performance outcomes (PO) of State code 25 of SDAP.</p> <p>Of particular concern is the location of proposed cabins 7 – 9, which are adjacent to the koala habitat area on the south-eastern portion of the site and any proposed development within the koala habitat area on the south-eastern portion of the site (including stormwater treatment, waste treatment, trails, boardwalks, landscaping, etc.).</p> <p><u>Action:</u> The following changes to the development are required to in order for SARA to be satisfied the development is capable of achieving compliance with State code 25 of SDAP:</p> <ul style="list-style-type: none"> • exclude development within the remaining vegetation on the south-eastern portion

	<p>of the site that is located within the mapped koala habitat area ('retained area') except for low impact development such as narrow gravel pathways. Retaining walls, board walks, stormwater infrastructure, landscaped gardens, etc will not be supported in this area</p> <ul style="list-style-type: none"> • maintain a development free buffer adjacent to the 'retained area', which takes into account additional exempt clearing as a result of the development (i.e. cabins 7, 8 and 9 may need to be relocated or removed) • provide an updated landscape plan that will improve the quality of the 'retained area' that involves planting of species reflective of the regional ecosystem and endemic to the area (local provenance), including koala habitat trees and feed trees for glossy black cockatoo and Pararistolochia vines). • demonstrate that the release of any stormwater into the retained area will not impact on downstream native vegetation, threatened species habitat and Tamborine National Park • incorporate sufficient koala-sensitive design to ensure safe koala movement is provided for despite the development (i.e. maintain koala movement east-west).
2.	<p>Issue</p> <p>The submitted Statement of Landscape Intent includes koala habitat trees as part of the planting palette. However, the number of koala habitat trees that will be planted has not been supplied and what has been provided is only indicative.</p> <p>The recommendations of the submitted Bushfire Management Plan, prepared by Land and Environment Consultants, preclude the planting of koala habitat trees onsite including within the mapped koala habitat area. Additionally, the Statement of Landscape Intent seems to indicate that the koala habitat area will be transformed into a landscaped garden/recreational/drainage/stormwater/waste treatment zone with species that do not appear to be reflective of the regional ecosystem within the koala habitat area. There is concern that this will impact on the natural floristics of the ecosystem and prevent natural succession of the regional ecosystem/koala habitat trees.</p> <p>Action</p> <p>To demonstrate compliance with PO1 of State code 25 of SDAP:</p> <ul style="list-style-type: none"> • provide a landscaping plan that details the type, number and location of proposed planting (approximation is fine). • determine whether the natural floristics of the regional ecosystem within the koala habitat area will be maintained despite proposed landscaping. • determine whether natural succession of the regional ecosystem will be effected by the proposed landscaping. • provide details of the interaction between the Landscaping Plan and other plans such as the Bushfire Management Plan, demonstrating that these plans are not conflicting.
3.	<p>Issue:</p> <p>SARA is unable to determine what has and has not been cleared on site under existing development approvals and exemptions. Furthermore, it is not possible to determine the extent and severity of impacts on the koala habitat due to insufficient detail provided about the proposed development.</p> <p>Action:</p> <p>To demonstrate compliance with PO1 of State code 25 of SDAP:</p> <ul style="list-style-type: none"> • Provide updated plans and kml files that spatially identify: <ul style="list-style-type: none"> o all parts of the site that have been cleared. o all parts of the site that are still vegetated.

	<ul style="list-style-type: none"> • Provide updated plans and kml files that spatially identify the complete extent of the proposed development footprint including (but not limited to) the location and extent of proposed: <ul style="list-style-type: none"> o earthworks o buildings o roads o trails o board walks o retaining walls o stormwater treatment o waste treatment o landscaping • Provide a detailed description of all components of the proposed development identified above: <ul style="list-style-type: none"> o identifying direct and indirect impacts to native vegetation on site, including impacts to tree protection zones of all trees proposed to be retained on site o confirming the area of impact (ha/m²) and total number of non-juvenile koala habitat trees that would be impacted from the proposed development o clarifying whether waste/effluent is proposed to be treated in the koala habitat area – if effluent disposal is proposed within koala habitat area, demonstrate that the following conditions can be met and maintained: <ul style="list-style-type: none"> <input type="checkbox"/> the treated sewage quality should have low levels of total nitrogen and phosphorus <input type="checkbox"/> the annual loading on nitrogen and phosphorus into the soil should not exceed 50 kg/ha/year and 25 kg/ha/year respectively <input type="checkbox"/> irrigation must not exceed the irrigation demand or water requirements of the crop/trees <input type="checkbox"/> irrigation should have high distribution efficiency (spread evenly across the site) <input type="checkbox"/> irrigation must not cause waterlogging or saturation of the soil <input type="checkbox"/> irrigation must not cause surface runoff or surface ponding <input type="checkbox"/> applying a small quantity frequently is recommended <input type="checkbox"/> deep drainage of irrigated effluent should be minimised. • Ensure all new and updated plans reports are consistent and clearly identify the areas of impact upon koala habitat areas
4.	<p>Issue: The design and siting of the development results in impediments restricting connectivity. Sites that are vegetated or that contain cleared undeveloped land, with or without stepping stones or single koala habitat trees, provide opportunities for koalas to move safely throughout the landscape. Development that removes an area providing safe movement opportunities results in fragmentation of the remaining koala habitat areas.</p> <p>In its current form, the site still provides opportunities for koalas to move unimpeded through the landscape because it is currently unimpeded land (i.e. does not have impenetrable barriers). This movement will be impeded by the proposed development unless sufficient measures are incorporated into the siting and design of the development. This is particularly relevant as the remaining koala habitat area on site is “highly connected” (i.e. within 200m) of all surrounding koala habitat areas. Insufficient measures are proposed to mitigate these impediments.</p>

	<p><u>Action:</u> To demonstrate compliance with PO3 of State code 25 of SDAP, provide a report prepared by a suitably qualified ecologist that:</p> <ul style="list-style-type: none"> • assesses existing connectivity values and safe koala movement opportunities, in particular to the adjoining properties to the west and south • assesses connectivity values and safe koala movement opportunities that will remain post-development, in particular to the adjoining properties to the west and south • identifies all barriers/impediments to safe koala movement within and between highly connected patches of koala habitat area (both on and off site) that will be introduced by the development (e.g. clearing corridors and stepping stones, constructing fences, pools, retaining walls, stormwater infrastructure, retaining walls, intensification of use, proposed used) • outlines all measures proposed to mitigate the impacts these barriers/impediments will have on safe and unimpeded koala movement within and between highly connected patches of koala habitat area (both on and off site) • provides justification for why the proposed measures are suitable for providing safe koala movement opportunities • assesses connectivity values and safe koala movement opportunities with proposed measures to mitigate impacts on safe and unimpeded movement of koalas within and between highly connected patches of koala habitat area (both on and off site).
5.	<p><u>Issue:</u> SARA's information request sought targeted species surveys in accordance with the Terrestrial Vertebrate Fauna Survey Guidelines for Queensland (Eyre et al. 2018) for all MSES fauna mapped onsite in order to accurately identify all threatened fauna and habitat that currently occurs or is likely to occur on the current site. Instead, a desktop analysis of the likelihood of occurrence for the species was provided, which concluded that none of the fauna species identified in the information request were likely to occur.</p> <p>SARA does not agree with the conclusions of the BIOME Consulting assessment made through the likelihood of occurrence assessment for a number of species and/or requires additional information to support the conclusions made in the likelihood of occurrence assessment (including for Richmond birdwing butterfly, tusked frog, cascade tree frog, glossy black cockatoo, Albert's lyre bird, plumed frogmouth and spotted-tail quoll).</p> <p><u>Action:</u> To demonstrate compliance with PO5 of State code 25 of SDAP:</p> <ul style="list-style-type: none"> • provide a Significant Species Target Survey in accordance with the Terrestrial Vertebrate Fauna Survey Guidelines for Queensland (Eyre et al. 2018) for all MSES fauna mapped onsite as detailed within the SARA information request.

Please note that unlike an information request, assessment timeframes do not stop when advice is provided by SARA.

How to respond

It is recommended that you address these issues promptly and provide a response to SARA prior to the information request response. If you decide not to respond, your application will be assessed and decided based on the information provided to date.

Under the [Development Assessment Rules](#) (DA Rules), the issuing of advice does not stop the assessment timeframes. If you intend to provide additional information, it should be provided in a timely manner to allow sufficient time for the information to be considered. As such, you are strongly encouraged to consider using the 'stop the clock' provisions under section 32 of the DA rules, to allow sufficient time for you to consider and respond to SARA's advice; and for SARA to consider any new or changed material provided.

If you wish to utilise the 'stop the clock' provisions, you should give notice to the assessing authority (assessment manager or referral agency) whose current period you wish to stop. This can be done through MyDAS2 or via correspondence.

You are requested to upload your response and complete the relevant tasks in [MyDAS2](#).

If you require further information or have any questions about the above, please contact Dash D'Brant, Planning Officer, on 3432 2423 or via email lpswitchSARA@dsgmip.qld.gov.au who will be pleased to assist.

Yours sincerely



Warren Oxnam
Planning Manager SEQ West

cc Scenic Rim Regional Council, mail@scenicrim.qld.gov.au

Development details	
Description:	Development permit Material change of use for tourist cabins (short-term disability accommodation)
SARA role:	Referral agency
SARA trigger:	Schedule 10, part 10, division 3, subdivision 3, table 1, item 1 (Planning Regulation 2017) Development interfering with koala habitat in koala priority areas outside koala priority areas
SARA reference:	2005-16950 SRA
Assessment criteria:	State code 25: Development in South-East Queensland koala habitat areas of the State Development Assessment Provisions v2.6