

Quality Attributes of the First Nine Offset Proposal

Quality attributes for existing, with and without offset are the same as approved within EPBC 2013/7057 with the exception of a greater volume of time (15 versus 2 years) has been allocated to achieve these outcomes.

Offset Attributes	EPBC 2013/7057 – (Approved)	EPBC 2016/7676 – (Proposed)
Area of Offset	293ha	81.5ha
Time until ecological benefit	2	15
Start Quality (1-10)	8	8
Future Quality Without Offset	6	6
Future Quality With Offset	9	9

Existing Quality:

The existing quality of the land is designated an 8 out of 10 under field assessment of 6 transects sites located over the offset land utilising the *Guide to determining terrestrial habitat quality – A toolkit for assessing land based offsets under the Queensland Environmental Offsets Policy – Version 1.2 April 2017*. I note this method of assessment was recognised by the Department amongst the previously issued chronology of correspondence as an acceptable method to use in valuing the offset land.

Additionally the method was also chosen as it is the survey method used to collect base line data for the purposes of demonstrating improvements in quality as conditioned over the adjoining 293ha listed in EPBC Approval 2013/7057.

Further to this habitat quality survey method the following has also been completed over the First Nine Offset Proposal land:

- 1) Direct audit mapping and describing weed infestations
- 2) Spot Assessment Techniques for confirming Koala Occurrence
- 3) Other surveys and observations (including collection or predator evidence – wild dog prints / and noting cleared and degraded sections of the offset land).

Future Quality Without Offset:

Over a 20 year time horizon the future of the offset land is listed as degrading from an 8 out of 10 to a 6 out of 10 (or degrade by 20%). This degradation is justified by:

- 1) Expansion of weed infestations without treatment and removal (the dominant weed is Lantana which is a Weed of National Significance). Nearly all research on this species outlines its evasive qualities where left without intervention.

- 2) Maintenance or increase in wild dog and fox predation through the offset area – The offset area becomes part of a smaller local habitat extent for both koalas and predators as nearly 270ha of land contiguous with the offset area is cleared under EPBC Approval 2013/7057.
- 3) Increased unlawful access by 4wd, trail bikes, and other all terrain vehicles, causing damage at entry point and throughout the offset area.
- 4) Increased potential for Vehicle / Koala conflict along key locations of the Springfield Greenbank Arterial Road as surrounding development land is cleared leaving only the offset area for habitat and connectivity.

Future Quality With Offset:

The future quality of the land as secured and managed as an offset is stated to improve from an 8 to a 9 out of 10. This 10% improvement in the quality of the land is to be achieved by:

- 1) Decreasing the existing 17% weed infestation area to 5%. (12% improvement equalling 9.8ha no longer infested with Lantana making existing and replaced koala habitat values available).
- 2) Implementing an evolving pest management plan for dogs and foxes which includes:
 - a. Quarterly trapping and removal for 2 years post commencement
 - b. Every 6 months for the remaining life of the offset
 - c. A commitment to alter / increase the intensity of the pest management program if the evidence from the works being completed is not decreasing the existing population – as measured by data collected as part of the trapping program.
- 3) A provision for 200 lineal metres of Koala Exclusion / Directional fencing at the bridge / underpass conflict point along Springfield – Greenbank Arterial Road (fence to link sections of the road which already have a natural exclusion aspect with cut and fill batters at the bridge location).
- 4) Reinstate existing degraded areas through revegetation containing koala habitat and shelter trees – this includes denuded areas created through removal of mass weed infestations.
- 5) Reduce unlawful public access through the establishment of 4WD, Bike and Trespass barriers at noted unlawful access points (6 locations recorded during site survey). Barriers to be supported by Council prohibition signage.

The submitted offset proposal included in the advertised and final Preliminary Documentation Package has been edited, altered, and mostly expanded with additional technical information in light of feedback and responses provided throughout the assessment phase. On review it is complicated and convoluted to succinctly understand the precise benefits of the improvement actions for the proposed offset land. As a simple summary the attached table contains offset quality commitments, how they are proposed to be measured as part of the offset framework post approval and be monitored and reported on during the life of the offset.

This table is provided in support of the development of outcomes based conditions to be applied to the offset land.

Current Threat / Quality Improvement Restoration	Base Case	Improvement Proposed	Achievement Criteria	Measured By	Timeframes	Reporting	Funded By:
1. Removal of Weeds of National Significance (WONS – Namely Lantana)	17% of the 81.5ha offset land has been mapped as containing Lantana of varying infestations (Approx. 14 ha of area effected by weeds)	Reduction and management of WONS through the Offset Area	Decrease and maintain WONS cover in the offset area to 5% or less (12% improvement to area of offset = 9.8ha of land)	Weed Survey Extent Mapping – repeated annually / measured against base line study already completed.	WONS reduced through the offset area to 5% by 3 years post the commencement of the Action. WONS maintained at 5% or below for 10 years post the Commencement of the Action	Weed Survey Extent Mapping included in the ACR for the project.	All weed management to be funded by the Approval Holder using licensed and registered contractors.
2. Pest Management – Wild (& Unwanted) Dog usage of Offset Area	<ol style="list-style-type: none"> 1. Site survey located fresh Dog prints within the offset area. 2. ICC White Rock – <i>Spring Mountain Conservation Estate – Tier 2 Management Plan</i> lists Wild Dogs, Red Foxes, Feral Pigs and Cane Toads as significant pest issues. This land is contiguous with the offset land – no dividing fence. 3. <i>2011 Environmental Impact Assessment</i> (Aurecon) for the adjoining Department of Defence bushland property to the east of the offset land located wild dogs as part of site surveys. 4. Wild Dogs and Foxes were recorded on the Spring Mountain project as listed in the <i>November 2013 Austecology MNES vertebrate Fauna Assessment</i>. This land is contiguous with the offset land. 	Reduction and management of Pest Species (namely wild dogs)	Trapping and removal program for pest species through the Offset Area (in-conjunction with the same activity over the adjoining land as forming the offset for Lendlease)	Results of annual pest trapping, capture and removal program. <i>(Exact numbers of the local / contextual wild dog population are not known – results will be measured on the trapped animals as a minimum being a reduction in the population – if reduction is not demonstrated intensity of program and trapping will be revised)</i>	Annual Program to include quarterly trappings for years 1 and 2 post commencement and twice yearly for balance of offset program. Program to run annually for the life of the offset (20 years)	Program will include an annual pest management report to be included as part of the ACR for the project.	Pest Management Program to be funded by the Approval Holder using registered Pest Management Contractor.
3. Koala Exclusion / Directional Fencing – At offset conflict location	Currently the proposed offset land is severed by Springfield-Greenbank Arterial Road. The road design includes a number of natural barriers to fauna movement (Large cut / Fill road batters), however retains no fencing at the key location where a bridge has been constructed.	Decrease koala / vehicle conflict opportunities at key locations along the road.	Construct Koala Exclusion / Directional Fencing at bridge crossing access point. Estimated 200 Lineal metres of fencing is required to cover exposure point and link to existing natural barriers.	GPS extent and photo graphs of constructed Fauna Exclusion / Directional Fencing. Annual check of fence integrity during offset period.	Fence constructed within 2 years from the commencement of the action (<i>Timeframe to allow for permission and approvals required by Local and State Government to install fencing on their land holdings</i>)	Reporting as built in the 2 nd ACR for the project. Fence inspection annually confirming integrity reported as part of the project ACR.	Cost of fencing, inclusive of necessary applications and approvals to be funded by the Approval Holder
4. Koala Habitat Replanting and Regeneration	At existing major erosion points and areas of extensive weed removal revegetation, inclusive of koala trees will be reinstated.	Increases in Koala Habitat resources (food and shelter trees)	Reinstated existing degraded areas, and those created through mass weed removal with revegetation, inclusive of koala habitat species.	Number of Koala trees replanted within the offset area = Equal or greater than 750 trees (Estimated between 3-5 ha of land sporadically)	All tree planting complete on or before 3 years post commencement of construction. <i>(Timeframe to allow for weed management measures to</i>	Tree installation reporting within the ACR period for which it occurs. Includes confirmation of total tree milestone	Replanting to be completed by a registered and experienced contractor at the cost of the Approval Holder

				requiring patches and broad areas of revegetation – Assume koala trees density of 150 trees per ha = total 750 trees)	<i>occur prior to some areas of resulting tree planting)</i>	achieved on or prior to 3 rd ACR. Success of tree planting and survival rates reporting on annually for period of the offset reporting. (note 750 trees is the minimum outcome meaning additional trees will need to be planted to account for stock failure or other losses)	
5. Reduce unlawful access and use of the Offset land by 4wd, trail bikes and all terrain vehicles (ATV)	Current the offset land includes a number of unlawful access tracks, entry points resulting in degraded and eroded sections throughout the offset area. 6 locations around the periphery of the offset land have been identified as being used to unlawful access into the offset land.	Reduce unlawful access and use by 4wd, trail bikes and ATV	Installation of new or substantial upgrades and extensions to barrier fencing at 6 identified locations of unlawful entry. Maintenance of access point during the offset period to confirm success of barrier works. Alteration and further upgrades to barriers where demonstrated to be unsuccessful.	Documented evidence of barrier installation (working drawings and photographs) provided during ACR. Annual review of installed and upgraded barriers for measurement of success (observation evidence of tyre tracks and damage circumventing barrier structures) Reporting on any adaptive alterations to barriers not shown to be successful (eg extension of fencing where new tracks show access occurring around the fence.)	2 barriers completed every 2 years. All 6 barriers constructed and operational with 6 years of the commencement of the action.	Evidence of barrier installation, monitoring and success provided to DoEE as part of relevant ACR.	
6. Overall Improvement of the quality of the offset area from and 8 to a 9.	Offset condition values at 8 out of 10 under the <i>Guide to Determining Terrestrial Habitat Quality</i> – Queensland Department of Environment and Heritage Protection. Value score is derived from 6 transects completed through the Offset Area.	Improve the quality from an 8 to a 9. (10% improvement)	By measure of achieving a 9 out of 10 average score at the 6 transect locations from surveys completed in accordance with the <i>Guide to Determining Terrestrial Habitat Quality</i> – Queensland Department of Environment and Heritage Protection.	Transect Data collected at 5 year intervals for the life of the offset.	Achieve a 9 out of 10 at the 10 year ACR and maintained for the life of the approval.	Transect data to be presented in a report completed in accordance with <i>Guide to Determining Terrestrial Habitat Quality</i> – Queensland Department of Environment and Heritage Protection and to form part of the ACR every 5 th year.	Transect completion and reporting to be funded by the Approval Holder.

s22

From: Barker, James
Sent: Tuesday, 21 November 2017 9:12 AM
To: s47F
Cc: s47F; springfieldland.com.au; s22
Subject: RE: 7399 E RE: Environmental offset for the First Nine Master Planned Residential Development, Brookwater, Qld (EPBC2016/7676) [SEC=UNCLASSIFIED]

Thanks s47F We'll get back to you as soon as we can.

From: s47F @saundershavill.com]
Sent: Tuesday, 21 November 2017 8:05 AM
To: Barker, James <James.Barker@environment.gov.au>
Cc: s47F @springfieldland.com.au
Subject: 7399 E RE: Environmental offset for the First Nine Master Planned Residential Development, Brookwater, Qld (EPBC2016/7676) [SEC=UNCLASSIFIED]

Hi James – further to our teleconference on Friday I provide some responses in line with our verbal discussions as notes in blue below. As directed I have left this high level and tried to avoid extremely detailed justifications. Although we have disclosed our disagreement on some items we have agreed to adopt the Department's position within the context of this discussion to advance the First Nine Project on the *Time until Ecological Benefit* and the *Risk of Loss* with values. These changes have resulted in the offset land increasing from 81.5ha to 89.5ha.

Hi s47F

Further to our meeting last week, this email is to provide you with the Department's current assessment of the First Nine offset, to inform our discussion tomorrow. The offset proposal for First Nine is a 81.5 ha site containing koala habitat in a large fauna movement corridor. The proposal involves management actions to improve habitat quality, minimising the introduction of pest animals and control of existing pest animals, and ensuring that the non-native weeds do not cover more than 10 % of the broader area conserved under an existing Voluntary Declaration.

Note 1: - Refer to subsequent table of actions for the offset for details of commitments proposed (Attached).

As mentioned previously, the Department has reviewed and commented on numerous offset submissions and scorings for the First Nine offset proposal and has considered it consistently with the previous Spring Mountain offset, where appropriate. Six of the nine offset calculator attribute scores from the Spring Mountain offset proposal have been adopted for the First Nine offset. Due to differences in site attributes, the Department considers that it is not appropriate to adopt the offset quality scores for Spring Mountain in the First Nine assessment. This email sets out the points of similarity and difference between the two proposals, and how the Department has applied these findings to the offset calculations for the First Nine proposal.

There is an important point of difference between the information provided for Spring Mountain and First Nine, this being that field work and ground surveys were undertaken on the offset site for First Nine, whereas none were undertaken for Spring Mountain. The field work provided further detail on koala habitat quality and the Department considers that the field work results do not support the asserted scoring of the future quality of the offset site without the offset in place. This is discussed in more detail below.

Your assessment uses the Queensland Government's '*Guide to Determining Terrestrial Habitat Quality*' and the *EPBC Act referral guidelines for the vulnerable koala* (koala referral guidelines) as a basis to assess the impact site and the '*Guide to Determining Terrestrial Habitat Quality*' for the offset site. The Department is of the view that the '*Guide to Determining Terrestrial Habitat Quality*' methodology has not been fully applied and it is unclear how some of the resulting values have been determined. As the placement and number of transects undertaken in your field surveys is not consistent with the requirements of the methodology, the Department is concerned that the results of the survey may not be representative of the actual habitat quality on the impact and offset sites. Further, scoring of habitat attributes has not been done consistently between the impact and offsets sites. For example, the threats to the koala at the impact site was scored 1/10, while the offset site was scored 7/10,

despite the fact there is no apparent difference in the level of threats between the two sites. As the Department is of the view this methodology has not been followed, it is unable to apply the same methodology to its assessment.

Note 2: - We disagree with this broad statement and would require more information to respond accordingly. The 'Guide to Determining Terrestrial Habitat Quality' lists a minimum of 2 transects per Assessment Units under the area of 50ha. The offset land has 3 Assessment Units all under 50ha in size. 2 transects have been completed in each. The impact size has 2 assessment units covering the 46.4ha area. The larger assessment unit is approximate 40ha and has 2 transects completed. The smaller unit is 6ha and only as a single completed transect due to its small size. In smaller Assessment Units it becomes difficult to locate multiple transects which avoid edge effects. This single transect approach to small Assessment Units has been used and confirmed as acceptable by EHP where this methodology has been employed for Queensland Offset assessments.

Note 4: Threats to Koala - Under the 'Guide to Determining Terrestrial Habitat Quality', there are three potential outcomes for 'Threats to Species' scored across a gradient, as follows:

1. High threat level – Scored as 1/10
2. Moderate threat level – Scored as 7/10
3. Low threat level – Scored as 15/10

Threat level is measured against the following criteria, and is subject to interpretation by a suitably qualified person.

Threat level should be based on the number and severity of threatening processes observed at or adjacent to the site, including:

- clearing associated with development
- creating a barrier to movement within or between habitat critical to the survival of the species
- the introduction or spread of disease or pathogens to an area (where this is known)
- increasing the risk of high-intensity fires
- degradation of habitat from hydrological change
- introducing or increasing mortality to a species due to vehicle strike or dog attacks.

As discussed the impact site is predominantly surrounded and adjacent to existing and approved development, infrastructure and other Town Centre uses, whereas the offset site adjoins and is confluent with the largest tract of eucalypt woodland in south-east Queensland. As such, to surmise that there is no apparent difference between the two sites with respect to species threats, especially to the Koala, is not agreed. For Koala survival the two areas differ considerably, and at least enough to be assigned differing threat levels under the Guideline.

Taking these considerations into account, the Department's current assessment of the First Nine offset proposal is detailed below and has been undertaken using the koala referral guidelines habitat assessment tool.

Note 4: Both sites have been assessed using the 'Guide to Determining Terrestrial Habitat Quality' method. Specifically this survey was retrospectively completed on the impact site as per the advice of DoEE. Additionally the balance of the offset land from EPBC 2013/7057 is being benchmarked and measured for improvement using this methodology.

Impact site

The Department understands that the impact site is a total of 46.2 ha. Using the koala referral guidelines the Department scores the habitat quality of the impact site as 9. This score is based on the following information presented in the assessment documentation: koalas are present and have been observed onsite within the last two years (+2); two or more koala food trees are present (+2); the area is part of a contiguous landscape over 500 ha (+2); there is little or no evidence of koala mortality from vehicle strike or dog attack (+2); and, it is uncertain whether the habitat is important for achieving the interim recovery objectives as there is no information on the presence of disease within the koalas at the site or whether they are breeding (+1).

We understand your current view is that the impact site should be scored 6. SHG's scoring is based on the following information presented in the assessment documentation: koalas are present and have been observed onsite within the last two years (+2); two or more koala food trees are present (+2); the area will be part of a contiguous landscape over 300 ha but less than 500 ha (+1); there are key existing threats in the broader landscape (+1); and, habitat is unlikely to be important for achieving the interim recovery objectives (0).

Note 5: - We believe the assessment of the site and offset using the Koala Habitat Assessment Tool Koala is redundant based on the 'Guide to Determining Terrestrial Habitat Quality' being applied. We disagree with the site impact score and note this is the first time this impact quality has been raised by the DoEE at this extremely high score. The method applied scores a zoned development site on the edge of the town centre flanked by a golf course, arterial roads, urban development and a number of larger EPBC approvals higher than land forming part of the largest bioregional corridor in south east Queensland, with direct nexus to the south and north east to 10s of thousands of ha of remnant Eucalyptus vegetation.

Offset site

Proposed offset site area: The proposed offset is 81.5 ha.

Risk of loss: As discussed at our meeting on 10 November 2017, the Department will apply the same risk of loss as for Spring Mountain on the basis of zoning under the South East Queensland Regional Plan 2005 – 2026, specifically 85% for land zoned 'Urban footprint'. The Department is applying a 10% risk of loss for the 73 ha zoned as 'Regional landscape and rural production area'. This risk of loss for the zoning is consistent with the assessment of the Spring Mountain development and was outlined in the Department's approval decision for that assessment. These risks of loss were noted in your correspondence of 21 December 2015 from SHG to the Department, in relation to the Spring Mountain.

Note 6: We disagree with this 5% reduction in the Risk of Loss and don't believe it is consistent with other offsets approved in relation to projects within the vicinity of the First Nine Project, however in context of this negotiation and interest of advancing the First Nine Project the reduction is accepted.

This increases the current offset land from 81.5ha to 88.5ha when calculating for 100% of the offset.

We note the Department's Report submitted by us lists a Risk of Loss without offset for the Non Urban Land as 10%. The same report lists land within the Urban Footprint as 80%, yet it is known that EPBC 2013/7057 was approved at 85% and this has been agreed as reinstated for this project. Risk of Loss values stem from calculator sheets presented and received with the Department since January 2015 during arguments on the proportionality of the offset. The Attached email from myself to Department shows the issuing to two calculation sheets in advance of a meeting to work through these values. A number of meetings were held to establish agreed calculator values. Within the detailed chronology of information provided to the Department for EPBC 2013/7057 there are numerous versions of calculation sheets edited and reissued many times by both the Department and the proponent. Within all of these the value for the lower Risk of Loss areas of offset land has consistently been 15% without offset because no legally binding mechanism exists on the land. A 10% risk of loss differential (15% without / 5% with) has always been applied to the preparation, lodgement and registering of a VDEC which makes the Queensland Government a-partied to the protection of the land rather than pure reliance on the Council. SLC Placed a VDEC over all this land rather than just the 293ha in the Lendlease approval on the understanding that as an advanced offset they would be assigned this risk of loss value.

The time over which loss is averted: The Department accepts 20 years, which is consistent with Spring Mountain.

Agreed as proposed

The risk of loss with offset: The Department accepts 5%, which is consistent with Spring Mountain.

Agreed as proposed

The confidence in result – Risk of loss: The Department accepts 90%, which is consistent with Spring Mountain.

Agreed as proposed

Time until ecological benefit: The Department has adopted a 20 year period. This is consistent with the approval conditions for Spring Mountain, which state that the gain in habitat quality will be achieved in 20 years.

Note 7: We accept 20 years and have made this adjustment. We note the approval for EPBC 2013/7057 includes conditions relating to the offset improving over a 20 year horizon. We note the approved offset area calculated through the attributes was established based on a 2 year horizon.

This increases the offset land from 88.5ha to 89.5ha when calculating for 100% of the offset.

Offset start quality: Using the koala referral guidelines the Department scores the offset start quality as 8. This score is based on the following information presented in the assessment documentation: koalas are present (+2); two or more koala food trees are present (+2); the area is part of a contiguous landscape over 500 ha (+2); dogs are present at the offset site (+1); and, it is uncertain whether the habitat is important for achieving the interim recovery objectives as there is no information on the presence of disease within the koalas at the site or whether they are breeding (+1).

Note 8: Agree the offset land is scored an 8/10, however arrive at this value using the 'Guide to Determining Terrestrial Habitat Quality' not the Koala Habitat Assessment Tool.

Future quality without the offset: The Department assigns a value of 8 to the future quality without offset and is of the understanding that your assessment is proposing a value of 6. A key difference between the Spring Mountain and the First Nine projects is that the Department considered the proposed Spring Mountain development would place pressure on the Spring Mountain offset area, therefore reducing the habitat quality over time. The Department's assessment of the future quality at the First Nine offset site differs from Spring Mountain because the Department considers that development pressures already exist at the First Nine offset site. Specifically, housing and roads are already adjacent to the offset site, and a road bisects the site. As such, the reasoning provided for future habitat degradation on the First Nine offset site, specifically worsening of weeds, increase in wild and domestic dogs and unrestricted access, does not appear to be supported. This is particularly apparent when the results of the field investigations are taken into account, which show that weeds and dogs are already present.

Note 9: Strongly Disagree with this Score and the arguments validating why this land is assessed differently to approved values in EPBC 2013/7057. It is noted that this score is applied to the future quality of the land at a 20 year time horizon and no information was known of the land 20 years ago to benchmark the change.

- On the grounds provided by the DoEE previous offset land approved in EPBC 2013/7057 was listed to degrade by 20% because it was not adjoined by development. The First Nine offset is already adjoined by development and therefore the level of degradation is already realised and over a 20 year period is expected to be 0%. If one site has already been degraded by development and the other has not how can both sites retain the same start value?. Additionally the offset site's are fragmented with portions of the approved offset adjoining development areas and portions of the First Nine Offset adjoining non developed areas.
- 17% of the offset land contains or is infested with Lantana – without intervention we believe this will spread over a 20 year time horizon (this is the researched evidence on the evasive nature of this species without intervention).
- Evidence shows that dogs and other pest species are currently using the offset land, Lendlease approved vacant development areas and the first nine vacant development areas. Dog populations will be forced off development sites as they are cleared and developed. It is reasonable to assume they will displace into the retained offset land areas resulting in an increase of usage.
- As the development portions of all projects in Greater Springfield occur the local koala populations will be flushed / displaced into the surrounding offset land. In conjunction with a greater reliance on the offset land development in the region will result in increased traffic along the Springfield – Greenbank Arterial Road which dissects the offset land. This has the potential to increase an existing conflict along the conservation corridor.

We believe there is a reasonable case that in 20 years without action the First Nine Proposed Offset Area will degrade by 20% in line with values approved on the adjoining land. Degradation without intervention will occur as hundreds of ha of vacant vegetated development land currently supporting threats are cleared displacing threats into the offset land.

The future quality with offset: The Department assigns a value of 8 and is of the understanding that your assessment is proposing a value of 9. The Department understands a V-Dec was put in place over the site in 2015. The Department has reviewed this document and, noting that it relates primarily to weeding, does not agree that the measures outlined will improve the quality of the habitat. However, the Department considers that provision of specific, measurable actions to reduce threats to koalas from dogs may improve the habitat quality score, if appropriately implemented, and assessed using the koala referral guidelines habitat assessment tool.

Note 10: Disagree – However base a 10% increase in quality on more recently submitted table of commitments, actions and measurements for monitoring and reporting on habitat improvement. As a starting point if 17% of the land is infested with Lantana and we removed 12% of this making the existing trees more accessible for food and shelter then the available koala habitat has improved by 12%. (based on the Department's position that the offset land has already been degraded by adjoining development as made to justify why no additional degradation can occur, how can the land not be improved?).

The confidence in result – habitat quality : The Department accepts 90%, which is consistent with Spring Mountain.

Agreed as proposed

Offset calculation

Taking the Departments assigned scoring into account and using the offset calculation, the percentage of impact offset is calculated as 17.4% (6.07% for 73ha and 11.31% for 8.5 ha).

Finally, I note the previous agreement between the Department and SLC that 25% of the broader conservation area would not be used to offset future SLC developments (this was recognised in our approval of Spring Mountain and also email correspondence with SHG in 2015). You have confirmed to us that the currently proposed offset is not part of that 25%. To assist us with finalisation of the First Nine offset assessment, we would be grateful if you would provide us with a map showing where the 25% portion of the conservation area is located.

Note 11: This comment references an email from January 2015 which follows a series of emails and meetings regarding a proportionality debate held for use of the conservation land as an offset spanning 2014 and 2015. Once the Department noted the conservation as available as an offset it sought to apportion 25% as having the major Risk of Loss claimed through clearing which had happened on other projects since dedication of the land in 2006. It also sought to only allow Spring Mountain Rise (Lendlease Project) to use the only the portion of the offset relative to its portion of the Greater Springfield project (eg project represented 26% of Springfield therefore was entitled to use 26% of the offset land).

Under this model the Department sought for 49% of the offset land to be set aside for projects yet to occur. Calculation sheets fell into a "Direct" and "Indirect" title, where direct represented a high Risk of Loss value assigned and Indirect still allowed for a low Risk of Loss through applying a VDEC and the quality to be improved (eg that land apportioned to previous clearing since 2006 could still be further secured via a VDEC as no legally binding mechanism existed). And as no improvements were required to the dedicated land these could occur and be valued as part of the offset)

Many of the un-commenced projects the department sought for offsets to be set aside were not owned by SLC and thus they successfully argued they had dedicated the conservation land and could use the value for this on which ever project they chose. The result of this was that 75% of the land moved to the "direct" titled calculations and retained a high risk of loss and could be assigned the by SLC. For the balance 25% the Risk of loss would be lower and limited to the VDEC (shown as 15 and 5 in sheets), however the full quality improvement could be credited if the works were committed to.

Although resulting in a similar outcome this position was discussed and agreed / move forward prior to the Department forming a position to apply the weighting to the Regional Plan designations for justification of the offset. This position is not reflected in the Lendlease approval or in subsequent negotiations with the Department on the First Nine Offset.

Thanks James – Please call myself with any direct questions.

s47F Director **Saunders Havill Group**

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From: Barker, James [<mailto:James.Barker@environment.gov.au>]

Sent: Thursday, 16 November 2017 11:10 AM

To: s47F @saundershavill.com>

Cc: s22

Subject: Environmental offset for the First Nine Master Planned Residential Development, Brookwater, Qld (EPBC2016/7676) [SEC=UNCLASSIFIED]

Hi s47F

Further to our meeting last week, this email is to provide you with the Department's current assessment of the First Nine offset, to inform our discussion tomorrow. The offset proposal for First Nine is a 81.5 ha site containing koala habitat in a large fauna movement corridor. The proposal involves management actions to improve habitat quality, minimising the introduction of pest animals and control of existing pest animals, and ensuring that the non-native weeds do not cover more than 10 % of the broader area conserved under an existing Voluntary Declaration.

As mentioned previously, the Department has reviewed and commented on numerous offset submissions and scorings for the First Nine offset proposal and has considered it consistently with the previous Spring Mountain offset, where appropriate. Six of the nine offset calculator attribute scores from the Spring Mountain offset proposal have been adopted for the First Nine offset. Due to differences in site attributes, the Department considers that it is not appropriate to adopt the offset quality scores for Spring Mountain in the First Nine assessment. This email sets out the points of similarity and difference between the two proposals, and how the Department has applied these findings to the offset calculations for the First Nine proposal.

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Taking these considerations into account, the Department's current assessment of the First Nine offset proposal is detailed below and has been undertaken using the koala referral guidelines habitat assessment tool.

Impact site

The Department understands that the impact site is a total of 46.2 ha. Using the koala referral guidelines the Department scores the habitat quality of the impact site as 9. This score is based on the following information presented in the assessment documentation: koalas are present and have been observed onsite within the last two years (+2); two or more koala food trees are present (+2); the area is part of a contiguous landscape over 500 ha (+2); there is little or no evidence of koala mortality from vehicle strike or dog attack (+2); and, it is uncertain whether the habitat is important for achieving the interim recovery objectives as there is no information on the presence of disease within the koalas at the site or whether they are breeding (+1).

We understand your current view is that the impact site should be scored 6. SHG's scoring is based on the following information presented in the assessment documentation: koalas are present and have been observed onsite within the last two years (+2); two or more koala food trees are present (+2); the area will be part of a contiguous landscape over 300 ha but less than 500 ha (+1); there are key existing threats in the broader landscape (+1); and, habitat is unlikely to be important for achieving the interim recovery objectives (0).

Offset site

Proposed offset site area: The proposed offset is 81.5 ha.

Risk of loss: As discussed at our meeting on 10 November 2017, the Department will apply the same risk of loss as for Spring Mountain on the basis of zoning under the South East Queensland Regional Plan 2005 – 2026, specifically 85% for land zoned 'Urban footprint'. The Department is applying a 10% risk of loss for the 73 ha zoned as 'Regional landscape and rural production area'. This risk of loss for the zoning is consistent with the assessment of the Spring Mountain development and was outlined in the Department's approval decision for that assessment. These risks of loss were noted in your correspondence of 21 December 2015 from SHG to the Department, in relation to the Spring Mountain.

The time over which loss is averted: The Department accepts 20 years, which is consistent with Spring Mountain.

The risk of loss with offset: The Department accepts 5%, which is consistent with Spring Mountain.

The confidence in result – Risk of loss: The Department accepts 90%, which is consistent with Spring Mountain.

Time until ecological benefit: The Department has adopted a 20 year period. This is consistent with the approval conditions for Spring Mountain, which state that the gain in habitat quality will be achieved in 20 years.

Offset start quality: Using the koala referral guidelines the Department scores the offset start quality as 8. This score is based on the following information presented in the assessment documentation: koalas are present (+2); two or more koala food trees are present (+2); the area is part of a contiguous landscape over 500 ha (+2); dogs are present at the offset site (+1); and, it is uncertain whether the habitat is important for achieving the interim recovery objectives as there is no information on the presence of disease within the koalas at the site or whether they are breeding (+1).

Future quality without the offset: The Department assigns a value of 8 to the future quality without offset and is of the understanding that your assessment is proposing a value of 6. A key difference between the Spring Mountain and the First Nine projects is that the Department considered the proposed Spring Mountain development would place pressure on the Spring Mountain offset area, therefore reducing the habitat quality over time. The Department's assessment of the future quality at the First Nine offset site differs from Spring Mountain because the Department considers that development pressures already exist at the First Nine offset site. Specifically, housing and roads are already adjacent to the offset site, and a road bisects the site. As such, the reasoning provided for future habitat degradation on the First Nine offset site, specifically worsening of weeds, increase in wild and domestic dogs and unrestricted access, does not appear to be supported. This is particularly apparent when the results of the field investigations are taken into account, which show that weeds and dogs are already present.

The future quality with offset: The Department assigns a value of 8 and is of the understanding that your assessment is proposing a value of 9. The Department understands a V-Dec was put in place over the site in 2015. The Department has reviewed this document and, noting that it relates primarily to weeding, does not agree that the measures outlined will improve the quality of the habitat. However, the Department considers that provision of specific, measurable actions to reduce threats to koalas from dogs may improve the habitat quality score, if appropriately implemented, and assessed using the koala referral guidelines habitat assessment tool.

The confidence in result – habitat quality : The Department accepts 90%, which is consistent with Spring Mountain.

Offset calculation

Taking the Departments assigned scoring into account and using the offset calculation, the percentage of impact offset is calculated as 17.4% (6.07% for 73ha and 11.31% for 8.5 ha).

Finally, I note the previous agreement between the Department and SLC that 25% of the broader conservation area would not be used to offset future SLC developments (this was recognised in our approval of Spring Mountain and also email correspondence with SHG in 2015). You have confirmed to us that the currently proposed offset is not part of that 25%. To assist us with finalisation of the First Nine offset assessment, we would be grateful if you would provide us with a map showing where the 25% portion of the conservation area is located.

Obviously, we will go through this further tomorrow.

Thanks
James

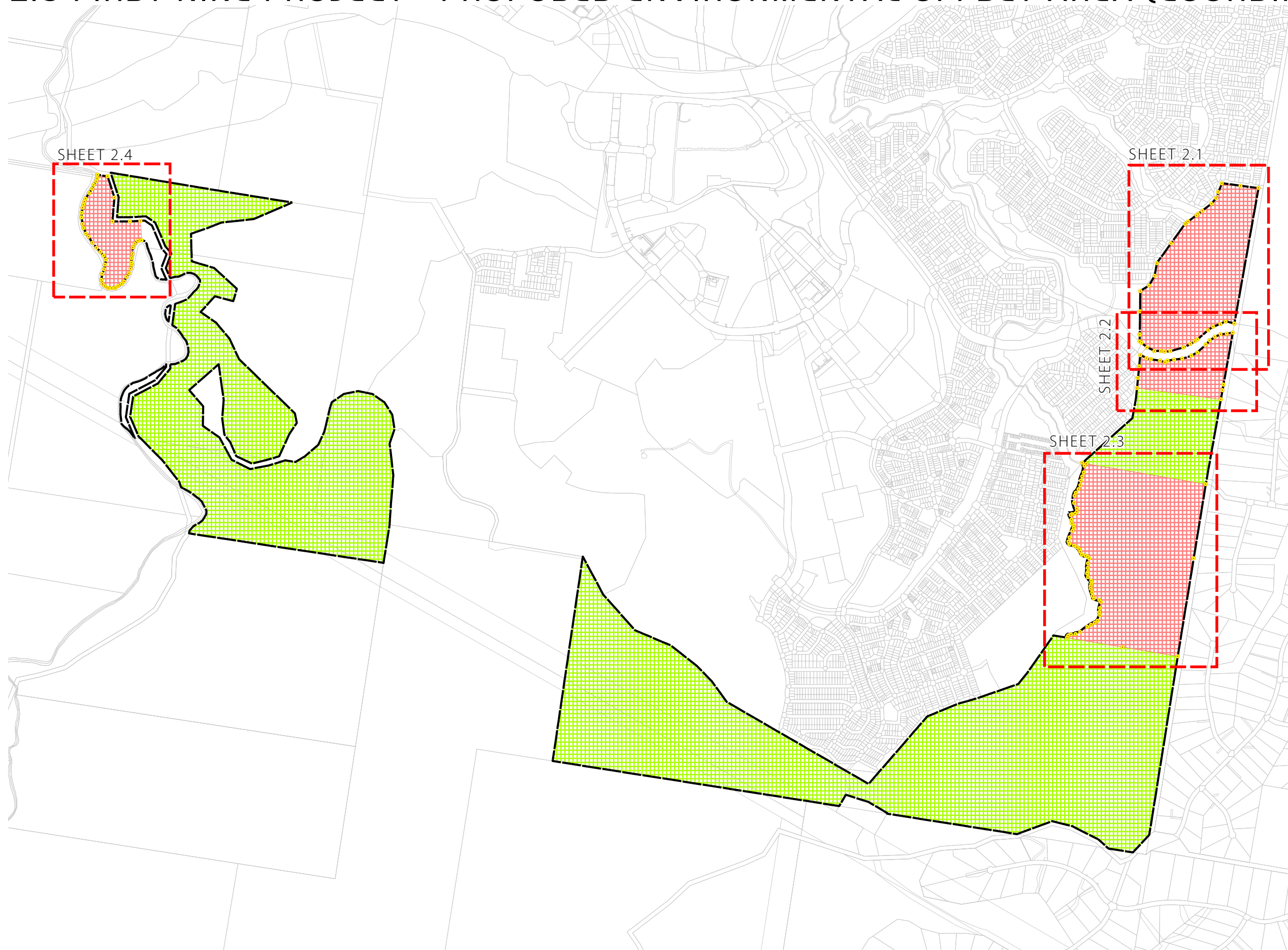
James Barker

Assistant Secretary | Assessments and Governance Branch
Environment Standards Division
Department of the Environment and Energy
t: 02 6274 2694 | e: james.barker@environment.gov.au

The Department acknowledges the traditional owners of country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures and to their elders both past and present



2.0 FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (COORDINATES)







NOTES
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Layer Sources: QLD GIS Layers (QLD Gov. Information Service 2016), Aerial (Nearmap 2016)

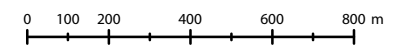
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LEGEND

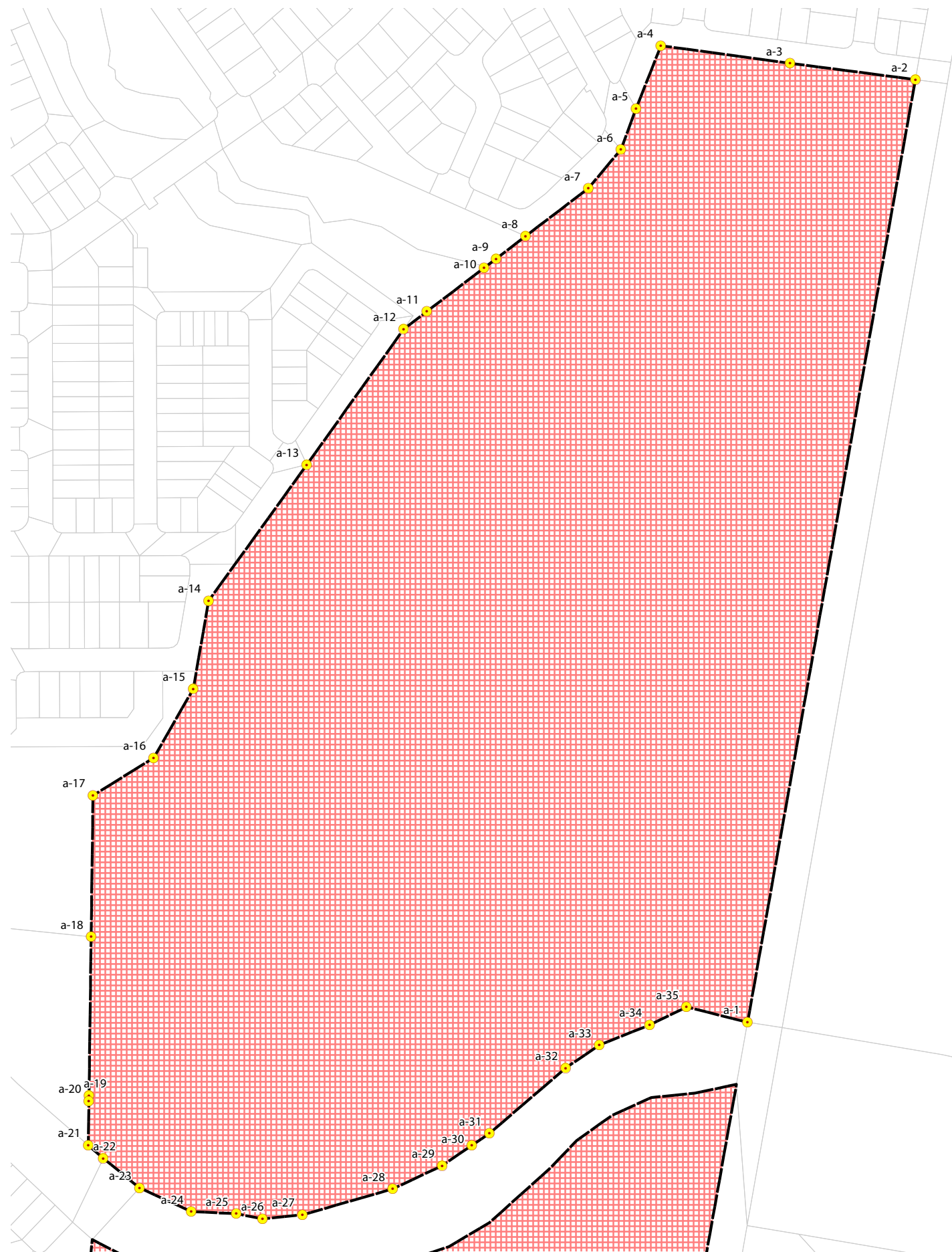
-  Qld DCDB
-  Springfield offset area (396 ha)
-  Springfield Rise (Lend Lease) offset component (293 ha)
-  Proposed First Nine offset (89.5 ha)

Issue	Date	Description	Drawn	Checked
B	13/06/2017	Area Calc. updated	TC	MS
C	19/07/2017	Remaining offset	MC	KG
D	6/11/2017	Update Layers	TC	MS
E	4/12/2017	Calc. Extra offset area	TC	MS
F	13/12/2017	Calc. Extra offset area	TC	MS

Transverse Mercator | GDA 1994 | Zone 56 | 1:18,500 @ A3



2.1 FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (AREA A)



Area A Coordinates Table (GDA94 MGA z56)		
ID	Longitude	Latitude
a-1	152.927692733	-27.6851098122
a-2	152.928875145	-27.6792204446
a-3	152.927996088	-27.6791181439
a-4	152.927088688	-27.6790080002
a-5	152.926913288	-27.6794012662
a-6	152.926806278	-27.6796574000
a-7	152.926577465	-27.6798989552
a-8	152.926137244	-27.6801975778
a-9	152.925929967	-27.6803384008
a-10	152.925846156	-27.6803951111
a-11	152.925442744	-27.6806680450
a-12	152.925280444	-27.6807778450
a-13	152.924599633	-27.6816246993
a-14	152.923909045	-27.6824750563
a-15	152.923800911	-27.6830256338
a-16	152.923522434	-27.6834557442
a-17	152.923096244	-27.6836902886
a-18	152.923082377	-27.6845738995
a-19	152.923066831	-27.6855645047
a-20	152.923066267	-27.6856004814
a-21	152.923061945	-27.6858758895
a-22	152.923167929	-27.6859581020
a-23	152.923420638	-27.6861422660
a-24	152.923784778	-27.6862907009
a-25	152.924100244	-27.6863042661
a-26	152.924285545	-27.6863362676
a-27	152.924566367	-27.6863117563
a-28	152.925201012	-27.6861499450
a-29	152.925546967	-27.6860047100
a-30	152.925756266	-27.6858780825
a-31	152.925879579	-27.6858034767
a-32	152.926415501	-27.6853948448
a-33	152.926651500	-27.6852516568
a-34	152.927005700	-27.6851264122
a-35	152.927264932	-27.6850142435

NOTES
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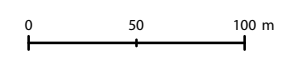
Layer Sources: QLD GIS Layers (QLD Gov. Information Service 2016), Aerial (Nearmap 2016)
 * This note is an integral part of this plan/data. Reproduction of this plan or any part of it without this note being included in full will render the information shown on such reproduction invalid and not suitable for use.

LEGEND

- Qld DCDB
- Springfield offset area (396 ha)
- Proposed First Nine offset (89.5 ha)
- Proposed First Nine offset bounding coordinates (GDA94 MGA zone 56)

Issue	Date	Description	Drawn	Checked
B	13/06/2017	Area Calc. updated	TC	MS
C	19/07/2017	Remaining offset	MC	KG
D	6/11/2017	Update Layers	TC	MS
E	4/12/2017	Calc. Extra offset area	TC	MS
F	13/12/2017	Calc. Extra offset area	TC	MS

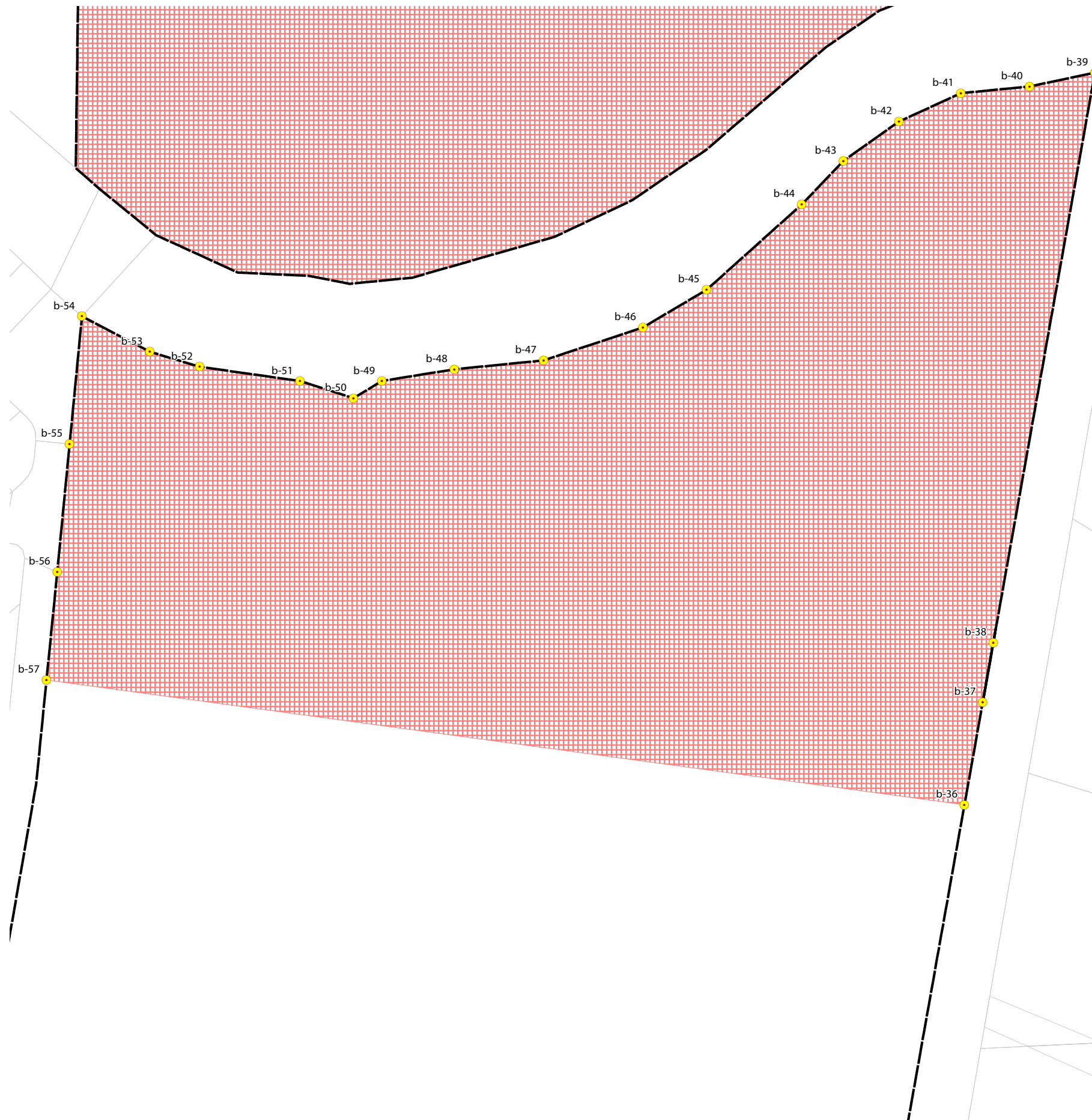
Transverse Mercator | GDA 1994 | Zone 56 | 1:3,500 @ A3



FIRST NINE, SPRINGFIELD



2.2 FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (AREA B)



NOTES
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Layer Sources: QLD GIS Layers (QLD Gov. Information Service 2016), Aerial (Nearmap 2016)

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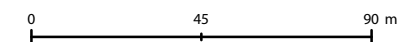
- LEGEND**
- Qld DCDB
 - Springfield offset area (396 ha)
 - Proposed First Nine offset (89.5 ha)
 - Proposed First Nine offset bounding coordinates (GDA94 MGA zone 56)

Area B Coordinates Table (GDA94 MGA z56)

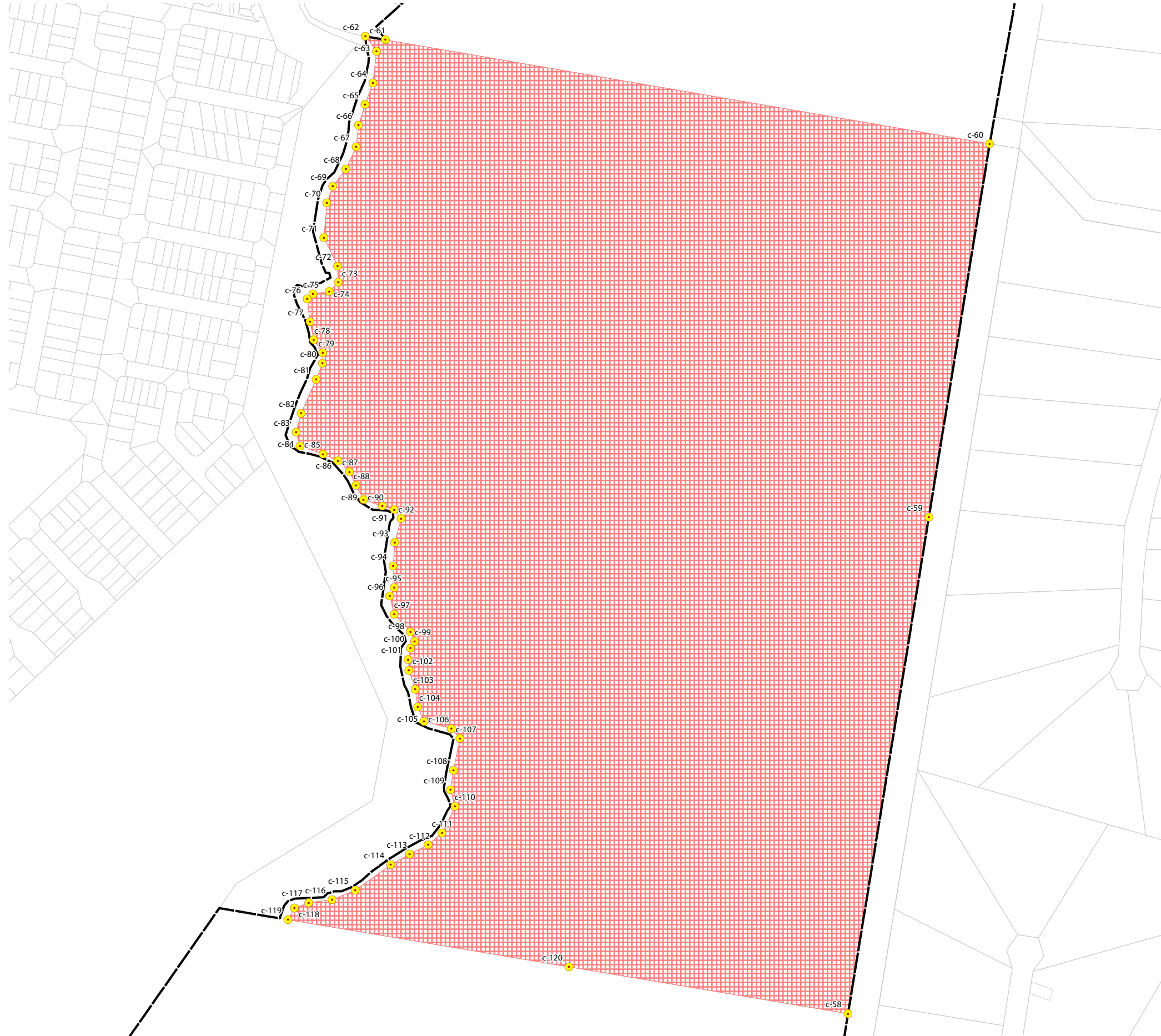
ID	Longitude	Latitude
b-36	152.927030235	-27.6884093009
b-37	152.927112188	-27.6880011622
b-38	152.927159519	-27.6877653128
b-39	152.927614778	-27.6854981110
b-40	152.927323617	-27.6855529250
b-41	152.927015856	-27.6855797620
b-42	152.926739380	-27.6856923330
b-43	152.926491097	-27.6858485790
b-44	152.926305376	-27.6860216260
b-45	152.925879471	-27.6863607990
b-46	152.925595269	-27.6865103620
b-47	152.925151177	-27.6866412910
b-48	152.924752891	-27.6866763530
b-49	152.924429521	-27.6867225540
b-50	152.924302146	-27.6867908390
b-51	152.924063385	-27.6867227700
b-52	152.923615515	-27.6866658110
b-53	152.923392095	-27.6866056550
b-54	152.923089094	-27.6864647870
b-55	152.923033744	-27.6869721260
b-56	152.922978200	-27.6874812920
b-57	152.922929863	-27.6879107804

Issue	Date	Description	Drawn	Checked
B	13/06/2017	Area Calc. updated	TC	MS
C	19/07/2017	Remaining offset	MC	KG
D	6/11/2017	Update Layers	TC	MS
E	4/12/2017	Calc. Extra offset area	TC	MS
F	13/12/2017	Calc. Extra offset area	TC	MS

Transverse Mercator | GDA 1994 | Zone 56 | 1:2,000 @ A3



2.3 FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (AREA C)



Area C Coordinates Table (GDA94 MGA z56)		
ID	Longitude	Latitude
c-58	152.924915467	-27.6995800778
c-59	152.925699867	-27.6953089357
c-60	152.926289469	-27.6920982820
c-61	152.920450046	-27.6911998196
c-62	152.920256771	-27.6911700740
c-63	152.920363471	-27.6912981050
c-64	152.920328632	-27.6915704910
c-65	152.920253426	-27.6917554740
c-66	152.920189790	-27.6919353310
c-67	152.920166545	-27.6921203510
c-68	152.920068257	-27.6923104670
c-69	152.919941112	-27.6924594420
c-70	152.919883274	-27.6926033270
c-71	152.919854179	-27.6929014100
c-72	152.919986807	-27.6931481960
c-73	152.919992477	-27.6932869700
c-74	152.919905782	-27.6933652310
c-75	152.919749893	-27.6933844910
c-76	152.919692114	-27.6934307140
c-77	152.919719733	-27.6936255770
c-78	152.919755712	-27.6937798340
c-79	152.919843189	-27.6938933730
c-80	152.919840395	-27.6939833980
c-81	152.919777721	-27.6941204520
c-82	152.919633113	-27.6944117100
c-83	152.919584863	-27.6945744830
c-84	152.919623278	-27.6946944670
c-85	152.919844642	-27.6947631460
c-86	152.919988990	-27.6948218200
c-87	152.920099631	-27.6949161590
c-88	152.920162112	-27.6950318960
c-89	152.920236051	-27.6951553080
c-90	152.920417085	-27.6952120290
c-91	152.920532584	-27.6952420850
c-92	152.920599915	-27.6953192650
c-93	152.920537189	-27.6955236420
c-94	152.920522608	-27.6957250390
c-95	152.920532055	-27.6959113850
c-96	152.920489229	-27.6959852050
c-97	152.920532495	-27.6961407070
c-98	152.920690663	-27.6962950680
c-99	152.920729101	-27.6963765100
c-100	152.920690559	-27.6964321960
c-101	152.920666419	-27.6965307440
c-102	152.920672856	-27.6966231610
c-103	152.920733623	-27.6967861950
c-104	152.920757577	-27.6969404740
c-105	152.920820050	-27.6970647870
c-106	152.921084747	-27.6971249360
c-107	152.921166509	-27.6972106770
c-108	152.921103746	-27.6974831890
c-109	152.921074741	-27.6976503060
c-110	152.921117954	-27.6977960240
c-111	152.920992643	-27.6980230730
c-112	152.920857795	-27.6981258470
c-113	152.920679651	-27.6982028710
c-114	152.920496672	-27.6982970390
c-115	152.920151561	-27.6985160110
c-116	152.919928469	-27.6985966790
c-117	152.919704571	-27.6986215340
c-118	152.919567414	-27.6986693220
c-119	152.919502705	-27.6987684890
c-120	152.922217667	-27.6991755999

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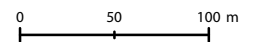
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LEGEND

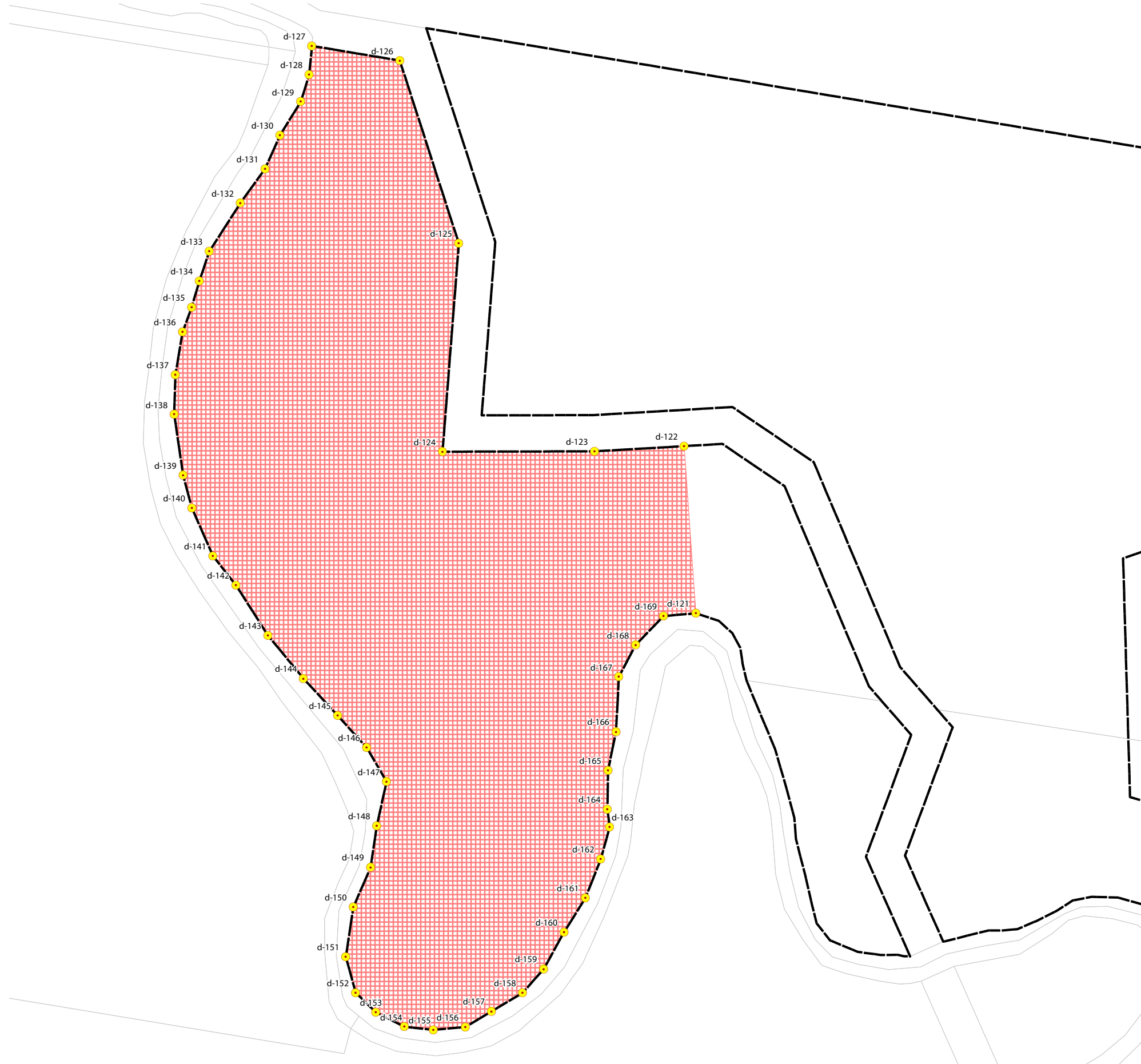
- Qld DCDB
- Springfield offset area (396 ha)
- Proposed First Nine offset (89.5 ha)
- Proposed First Nine offset bounding coordinates (GDA94 MGA zone 56)

Issue	Date	Description	Drawn	Checked
B	13/06/2017	Area Calc. updated	TC	MS
C	19/07/2017	Remaining offset	MC	KG
D	6/11/2017	Update Layers	TC	MS
E	4/12/2017	Calc. Extra offset area	TC	MS
F	13/12/2017	Calc. Extra offset area	TC	MS

Transverse Mercator | GDA 1994 | Zone 56 | 1:4,000 @ A3



2.4 FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (AREA D)



Area D Coordinates Table (GDA94 MGA z56)		
ID	Longitude	Latitude
d-121	152.874297866	-27.6814457241
d-122	152.874233553	-27.6806078836
d-123	152.873728707	-27.6806335670
d-124	152.872872397	-27.6806343570
d-125	152.872965246	-27.6795904260
d-126	152.872634128	-27.6786739010
d-127	152.872139208	-27.6785999760
d-128	152.872123457	-27.6787441450
d-129	152.872075871	-27.6788792980
d-130	152.871958956	-27.6790470410
d-131	152.871874727	-27.6792155130
d-132	152.871735245	-27.6793873090
d-133	152.871560030	-27.6796292140
d-134	152.871503599	-27.6797781070
d-135	152.871460102	-27.6799089310
d-136	152.871408947	-27.6800331100
d-137	152.871368393	-27.6802466360
d-138	152.871361241	-27.6804461180
d-139	152.871411070	-27.6807509140
d-140	152.871460490	-27.6809160340
d-141	152.871578299	-27.6811556000
d-142	152.871708289	-27.6813027190
d-143	152.871888131	-27.6815551220
d-144	152.872088313	-27.6817711220
d-145	152.872279920	-27.6819566120
d-146	152.872443192	-27.6821164340
d-147	152.872555211	-27.6822875810
d-148	152.872499831	-27.6825091390
d-149	152.872464947	-27.6827169950
d-150	152.872367539	-27.6829158890
d-151	152.872324727	-27.6831648650
d-152	152.872379825	-27.6833452060
d-153	152.872493878	-27.6834433380
d-154	152.872654259	-27.6835163830
d-155	152.872816980	-27.6835323270
d-156	152.872997805	-27.6835180820
d-157	152.873144962	-27.6834395080
d-158	152.873320438	-27.6833471950
d-159	152.873438843	-27.6832279710
d-160	152.873554260	-27.6830427720
d-161	152.873674795	-27.6828714680
d-162	152.873761505	-27.6826775820
d-163	152.873812132	-27.6825155240
d-164	152.873798653	-27.6824266020
d-165	152.873802632	-27.6822327230
d-166	152.873847961	-27.6820387470
d-167	152.873864435	-27.6817640740
d-168	152.873959139	-27.6816039830
d-169	152.874115735	-27.6814598440

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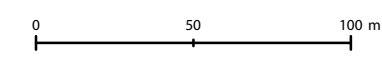
Layer Sources: QLD GIS Layers (QLD Gov. Information Service 2016), Aerial (Nearmap 2016)
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LEGEND

- Qld DCDB
- Springfield offset area (396 ha)
- Proposed First Nine offset (89.5 ha)
- Proposed First Nine offset bounding coordinates (GDA94 MGA zone 56)

Issue	Date	Description	Drawn	Checked
B	13/06/2017	Area Calc. updated	TC	MS
C	19/07/2017	Remaining offset	MC	KG
D	6/11/2017	Update Layers	TC	MS
E	4/12/2017	Calc. Extra offset area	TC	MS
F	13/12/2017	Calc. Extra offset area	TC	MS

Transverse Mercator | GDA 1994 | Zone 56 | 1:2,400 @ A3



FIRST NINE, SPRINGFIELD





EPBC Ref: 2016/7676

s47F

Director
Springfield Land Corporation
PO Box 4167
Springfield QLD 4300

Dear s47F

**Invitation to comment on proposed approval decision
First Nine Master Planned Residential Development, Brookwater, Qld
(EPBC 2016/7676)**

I am writing to you in relation to the above proposed action, which was referred and assessed under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) for its impacts on listed threatened species, specifically the koala (combined populations of Queensland, New South Wales, and the Australian Capital Territory) (*Phascolarctos cinereus* combined populations of Qld, NSW and the ACT) – vulnerable.

I am proposing to approve the proposed action subject to conditions.

My proposed decision of approval is attached. In accordance with the EPBC Act, I invite you to provide comments on my proposed decision of approval, including the conditions which I propose to attach, within 10 business days of the date of this letter.

Please quote the title of the action and EPBC reference, as shown at the beginning of this letter, in any correspondence. You can send comments by email to s22 @environment.gov.au.

If you have any questions about the process, please contact the project manager, s22 by email to s22 @environment.gov.au, or telephone s22 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

James Barker
Assistant Secretary
Assessments and Governance Branch

21 December 2017

CC Saunders Havill Group

DEPARTMENT OF THE ENVIRONMENT AND ENERGY

To: James Barker, Assistant Secretary, Assessments and Governance Branch (for decision)

Approval Decision Brief (recommendation report) – First Nine master planned residential development, Brookwater, Qld (2016/7676)

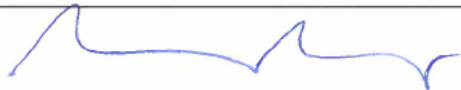
Timing: As soon as possible—the final decision was due 21 December 2017 (Statutory timeframe).

Recommendations:

1. Consider the supplementary recommendation report at **Attachment A** and the proposed approval decision package at **Attachment E**.
Considered / please discuss
2. Consider the response to the invitation for comment on the proposed decision at **Attachment B**.
Considered / please discuss
3. Approve, for each controlling provision, the action as summarised in the table below.
Approved / Not approved
4. Agree to attach the conditions of approval as set out in **Attachment C**.
Agreed / Not agreed
5. Sign the notice of your decision at **Attachment C**.
Signed / Not signed
6. If you agree to 3 and 4, accept the reasoning in the departmental briefing package as the reasons for your decision.
Accepted / Please discuss
7. Sign the letter at **Attachment D** advising the proponent, Springfield Land Corporation Pty Limited, of your decision.
Signed / Not signed

Summary of recommendations on each controlling provision:

Controlling Provisions for the action	Recommendation	
	Approve	Refuse to Approve
Listed threatened species and communities (ss 18, 18A)	Approve	



James Barker, Assistant Secretary, Assessments and Governance Branch:

Date: 9/1/18

Comments:

Key Points:

Background

1. On 21 December 2017, you made a proposed decision to approve, subject to conditions, the proposed action to construct the First Nine master planned residential development in Ipswich, Queensland, under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (**Attachment E**).
2. On 21 December 2017, as recommended in the proposed approval decision brief (**Attachment E**) you wrote to Springfield Land Corporation Pty Limited (proponent and person proposing to take the action) seeking comments on your proposed decision.
3. On 22 December 2017, the Department received a letter submitted on behalf of Springfield Land Corporation Pty Limited (**Attachment B**), stating they accept the proposed conditions.
4. No Commonwealth, or State, Ministers were invited to comment on the proposed decision.

Recommended decision

5. You are now required under section 130(1) and 133 of the EPBC Act to decide whether to approve the proposed action and if you decide to approve, what conditions you will attach to the approval under section 134 of the EPBC Act. The Department considers that you have enough information to make an informed decision on whether to approve the proposed action.
6. Except for the issues discussed in this brief, the mandatory considerations and factors to be taken into account in making your decision are as set out in the proposed decision package (**Attachment E**)—notably in the supplementary recommendation report (**Attachment A**).
7. The Department recommends that you approve the proposed action subject to the conditions at **Attachment C**.
8. If you agree, the Department recommends you sign the notice at **Attachment C** and the letter advising Springfield Land Corporation Pty Limited of your decision (**Attachment D**).
9. As no Commonwealth, or State, Ministers were invited to comment on the proposed approval decision, the Department does not consider it is necessary to advise them of your final approval decision.

s22

Director
Queensland South and Sea Dumping Section
Assessments and Governance Branch

T: s22

January 2018

s22

Queensland South and Sea Dumping
Section

T: s22

ATTACHMENTS

- A: Supplementary recommendation report
- B: Response to invitation for comment on proposed decision
- C: Notice of decision
- D: Letter to the proponent
- E: Proposed approval decision package

Date: 22nd of December 2017
Site: First Nine Residential Project
Client: Springfield Land Corporation
SHG Ref: 7399
SHG Contact: s47F
DoE Ref: 2016/7676

Attention: Mr. James Barker

Department of the Environment & Energy

Assistant Secretary | Assessments and Governance Branch | Environment Standards Division
GPO Box 787 | CANBERRA ACT 2601

Dear Mr. Barker,

RE: EPBC Act referral 2016 / 7676 – Proposed Approval – Invitation to Comment

I confirm that the **Saunders** (SHG) as the applicant for EPBC Act Referral 2016 / 7676 act for the proponent, **Springfield Land Corporation Pty Ltd** (SLC), in relation to the First Nine Master Planned Residential Development in Brookwater, Queensland.

Thank you for the opportunity to provide comments on the proposed approval for the project. On behalf of SLC please consider this letter as formal acknowledgement and acceptance of the proposed approval inclusive of conditions and attachments.

Thank you again and should you have any questions in relation to this request, please contact myself directly.

Yours sincerely

^
s47F

Director – Saunders Havill Group



APPROVAL

First Nine master planned residential development, Brookwater, Qld (2016/7676)

This decision is made under sections 130(1) and 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)*.

Details

Person to whom the approval is granted (approval holder)	Springfield Land Corporation Pty Limited
ACN or ABN of approval holder	ABN 055 714 531
Action	First Nine master planned residential development located to the east of Brookwater, Queensland, subject to the variation of the action accepted by the Minister under section 156B on Tuesday, 2 August 2016.

Approval decision

My decision on whether or not to approve the taking of the action for the purposes of each controlling provision for the action are as follows.

Controlling Provisions

Listed Threatened Species and Communities	
Section 18	Approve
Section 18A	Approve

Period for which the approval has effect

This approval has effect until Tuesday, 21 December 2038

Decision-maker

Name and position

James Barker
Assistant Secretary, Assessments and Governance Branch

Signature

Date of decision

9 January 2018

Conditions of approval

This approval is subject to the conditions under the EPBC Act as set out in ANNEXURE A.

ANNEXURE A – CONDITIONS OF APPROVAL

Part A – Conditions specific to the action

Project site

1. The **approval holder** must not clear more than 46.2 hectares of **koala habitat** within the **project site**.

Compensation for residual significant impact

2. To compensate for the loss of 46.2 hectares of **koala habitat** within the **project site**, the **approval holder** must:
 - a. Within 20 years of the date of decision, achieve a gain in koala habitat quality across the **offset site**, as described and measured by Item 6 of **Attachment B**.
 - b. Within two years of **commencement**, construct, and maintain for the **life of the approval**, **koala exclusion fencing** along the Springfield-Greenbank Arterial Road, where the road passes through the **offset site**.
 - c. In consultation with a **suitably qualified person**, prepare and implement a Koala Offset Management Plan for the **offset site**, which includes at least:
 - i. the management actions at **Attachment B**
 - ii. an adaptive management strategy, including milestone targets, to achieve the outcome identified in condition 2(a)
 - iii. a process for implementing the adaptive management strategy, which includes:
 1. a monitoring program to demonstrate whether milestones and outcomes described in conditions 2(a) and 2(b) have been met
 2. use of the data generated by the monitoring program to inform adaptive management.
3. If monitoring indicates that the outcomes identified at conditions 2(a) or 2(b) are not likely to be achieved, the **approval holder** must:
 - a. revise the Koala Offset Management Plan in consultation with a **suitably qualified person**
 - b. inform the **Department** in writing of the contingency measures that will be implemented to ensure condition 2(a) and 2(b) are met.

Part B – Standard administrative conditions

4. Within 20 **business days** after the **commencement**, the **approval holder** must advise the **Department** of the actual date of **commencement**.
5. The **approval holder** must maintain accurate **records** substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement any management plans or monitoring programs required by this approval, and make them available upon request to the **Department**. Such **records** may be subject to audit by the **Department** or an independent auditor in accordance with section 458 of the **EPBC Act**, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the **Department's** website. The results of audits may also be publicised through the general media.
6. Within 60 **business days** of every 12 month anniversary of **commencement**, the **approval holder** must publish a report on its website addressing compliance with each of the conditions of this approval, including implementation of any management plans or monitoring programs as specified in the conditions. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the **Department** at the



same time as the compliance report is published. The **Minister** may provide written consent to the **approval holder** to cease reporting under this condition if satisfied additional reports are not warranted.

7. The **approval holder** must report any potential or actual contravention of the conditions of this approval to the **Department** in writing within 5 **business days** of the **approval holder** becoming aware of the potential or actual contravention.
8. Upon the direction of the **Minister**, the **approval holder** must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the **Minister**. The independent auditor and criteria must be approved by the **Minister** prior to the commencement of the audit. The audit report must address the criteria to the satisfaction of the **Minister**.
9. If, at any time after 5 years from the date of this approval, the **approval holder** has not **commenced**, then the **approval holder** must not **commence** without the written agreement of the **Minister**.

Part C - Definitions

10. In these conditions, except where contrary intention is expressed, the following definitions are used:
 - a. **Approval holder** means the name of the person to whom the approval is granted, or any person acting on their behalf, or to whom the approval is transferred under section 145B of the **EPBC Act**.
 - b. **Business days** means a day that is not a Saturday, a Sunday or a public holiday in the location of the **action**.
 - c. **Clear/ clearing** means the cutting down, felling, thinning, logging, removing, killing, destroying, poisoning, ringbarking, uprooting or burning of native vegetation (but not including weeds – see the *Australian weeds strategy 2017 to 2027* available from <http://www.agriculture.gov.au/pests-diseases-weeds/pest-animals-and-weeds/review-pest-animal-weed-strategy/aus-weeds-strategy> for further guidance).
 - d. **Commence/ commenced/ commencement** means the point at which any **clearing** occurs on the **project site**.
 - e. **Department** means the Commonwealth Department of Environment and Energy or any other agency that administers the **EPBC Act** from time to time and includes, where the context permits, the officers, delegates, employees and successors of the **Department**.
 - f. **EPBC Act** means the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).
 - g. **Koala exclusion fencing** means fencing constructed in accordance with section 6.11.2 a) 'Fauna exclusion/ koala proof fencing' of *Fauna Sensitive Road Design Manual Volume 2*, Queensland Department of Transport and Main Roads, 2010.
 - h. **Koala habitat** means any vegetation that scores five or more using the *Koala habitat assessment tool* from the *EPBC Act referral guidelines for the vulnerable koala*.
 - i. **Life of the approval** means the period for which the approval has effect.
 - j. **Minister** means the Minister administering the **EPBC Act** including any delegate of the Minister.
 - k. **Offset site** means the areas designated as Proposed First Nine offset (89.5 ha) on the map at **Attachment C**.
 - l. **Project site** means the area defined as 'First Nine referral area' on the map, and by the coordinates, at **Attachment A**.



- m. **Records** means all documentation or other material in whatever form, including without limitation any correspondence, reports, assessments, methodologies, operations manuals, specifications, training materials and instructions or data.
- n. **Suitably qualified person** means a person who has professional qualifications, training, skills and/or experience related to the nominated subject matter and can give authoritative independent assessment, advice and analysis on performance relative to the subject matter using the relevant protocols, standards, methods and/or literature.

ATTACHMENTS

Attachment A — Project site

Attachment B — Management actions

Attachment C — Offset site

Project site map



saunders havill group

SPRINGFIELD
SURVEYING & MAPPING

DATE: 2018.03.14
SCALE: 1:1000 9x18
DRAWN BY: J. HAVILL
CHECKED BY: J. HAVILL
PROJECT: Springfield Land Use Application
ADDRESS: 1000 Spring Street
ANN ARBOR, MI 48106
PHONE: 734.769.3333
FAX: 734.769.3334
WWW: www.sahg.com

APPROVED BY: [Signature] DATE: 2018.03.14
APPROVED BY: [Signature] DATE: 2018.03.14

First Nine Referral Area

Plan 1

SHG#4
7399 801 9th Street, Ann Arbor, MI 48106
734.769.3333

Project site coordinates

<u>Area</u>	<u>ID</u>	<u>Longitude</u>	<u>Latitude</u>
1	1	152.901666033	27.6587342667
1	2	152.901807189	27.6592116111
1	3	152.902838389	27.6606015222
1	4	152.903166133	27.6615477333
1	5	152.903353189	27.6624894333
1	6	152.903537422	27.6655083556
1	7	152.903244833	27.6657696889
1	8	152.901981589	27.6664580667
1	9	152.901363222	27.6670157000
1	10	152.899929756	27.6676810000
1	11	152.898743289	27.6686368667
1	12	152.897404078	27.6696047778
1	13	152.896827356	27.6689880000
1	14	152.896364922	27.6687022111
1	15	152.896001633	27.6683559111
1	16	152.895789822	27.6677650333
1	17	152.896649044	27.6677680333
1	18	152.897286800	27.6670793111
1	19	152.897543611	27.6663209667
1	20	152.898242589	27.6645993111
1	21	152.898826711	27.6633530556
1	22	152.898855833	27.6629978667
1	23	152.898779344	27.6627726556
1	24	152.899396811	27.6621404222
1	25	152.900321233	27.6607629667
1	26	152.900671522	27.6600363667
1	27	152.901069378	27.6593637444
1	28	152.901343233	27.6590306111

<u>Area</u>	<u>ID</u>	<u>Longitude</u>	<u>Latitude</u>
2	29	152.902609849	27.6706093963
2	30	152.900517299	27.6705183378
2	31	152.900253474	27.6702319172
2	32	152.899323667	27.6702547309
2	33	152.899162455	27.6705173585
2	34	152.898895924	27.6704488400
2	35	152.898999978	27.6701027444
2	36	152.899864789	27.6692237000
2	37	152.900991438	27.6683874172
2	38	152.901728991	27.6685928048
2	39	152.902056520	27.6683398461
2	40	152.902213931	27.6678156617
2	41	152.902352158	27.6677452957
2	42	152.902394787	27.6680773398
2	43	152.902366349	27.6683794764
2	44	152.902143360	27.6687340248
2	45	152.902063945	27.6690397082
2	46	152.902576269	27.6691475558
2	47	152.903016260	27.6691383101
2	48	152.902945888	27.6698393119
2	49	152.902824668	27.6703945740

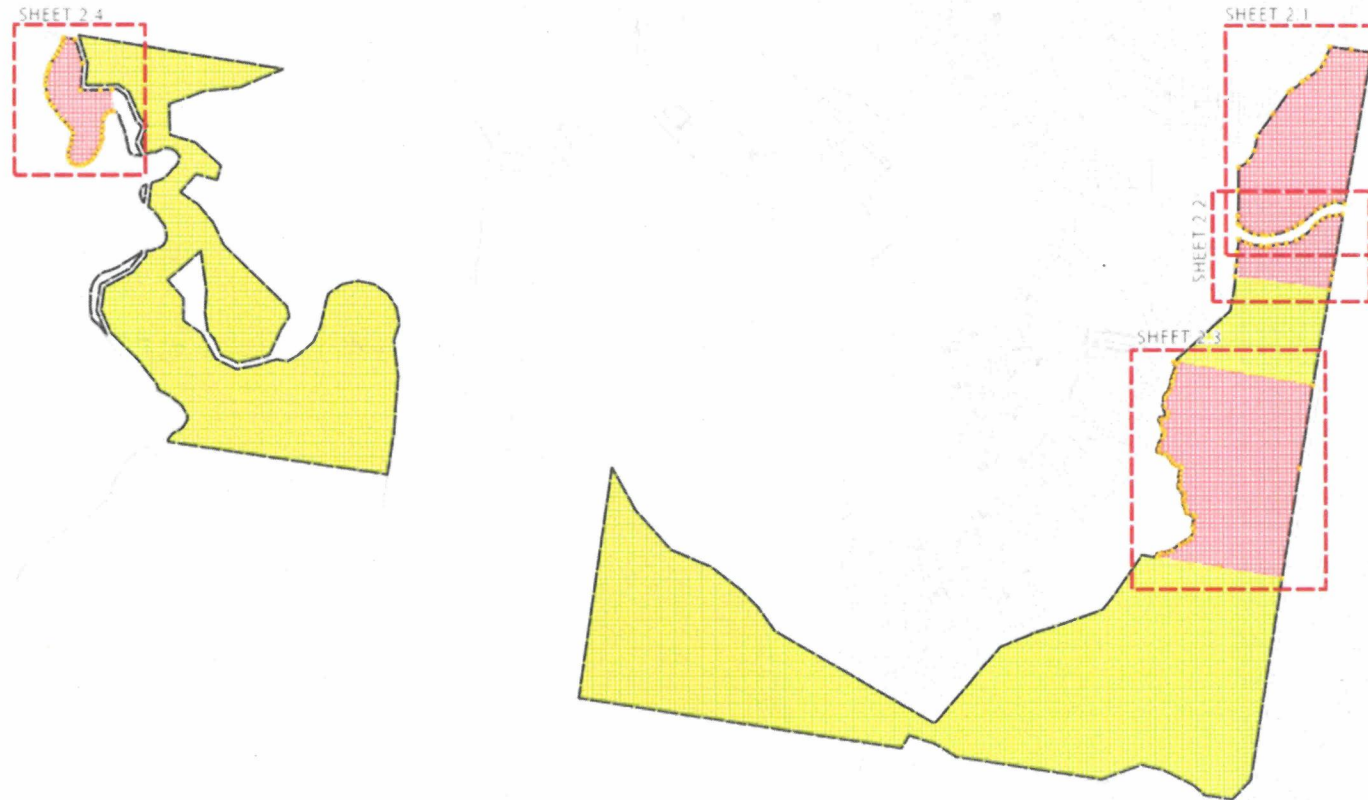
Management actions

Current Threat / Quality Improvement Restoration	Base Case	Improvement Proposed	Achievement Criteria	Measured By	Timeframes	Reporting	Funded By:
1. Removal of Weeds of National Significance (WONS – Namely Lantana)	17% of the 81.5ha offset land has been mapped as containing Lantana of varying infestations (Approx. 14 ha of area effected by weeds)	Reduction and management of WONS through the Offset Area	Decrease and maintain WONS cover in the offset area to 5% or less (12% improvement to area of offset = 9.8ha of land)	Weed Survey Extent Mapping – repeated annually / measured against base line study already completed.	WONS reduced through the offset area to 5% by 3 years post the commencement of the Action. WONS maintained at 5% or below for 10 years post the Commencement of the Action	Weed Survey Extent Mapping included in the ACR for the project.	All weed management to be funded by the Approval Holder using licensed and registered contractors.
2. Pest Management – Wild (& Unwanted) Dog usage of Offset Area	<ol style="list-style-type: none"> 1. Site survey located fresh Dog prints within the offset area. 2. ICC White Rock – <i>Spring Mountain Conservation Estate – Tier 2 Management Plan</i> lists Wild Dogs, Red Foxes, Feral Pigs and Cane Toads as significant pest issues. This land is contiguous with the offset land – no dividing fence. 3. <i>2011 Environmental Impact Assessment</i> (Aurecon) for the adjoining Department of Defence bushland property to the east of the offset land located wild dogs as part of site surveys. 4. Wild Dogs and Foxes were recorded on the Spring Mountain project as listed in the <i>November 2013 Austecology MNES vertebrate Fauna Assessment</i>. This land is contiguous with the offset land. 	Reduction and management of Pest Species (namely wild dogs)	Trapping and removal program for pest species through the Offset Area (in-conjunction with the same activity over the adjoining land as forming the offset for Lendlease)	Results of annual pest trapping, capture and removal program. <i>(Exact numbers of the local / contextual wild dog population are not known – results will be measured on the trapped animals as a minimum being a reduction in the population – if reduction is not demonstrated intensity of program and trapping will be revised)</i>	<p>Annual Program to include quarterly trappings for years 1 and 2 post commencement and twice yearly for balance of offset program.</p> <p>Program to run annually for the life of the offset (20 years)</p>	Program will include an annual pest management report to be included as part of the ACR for the project.	Pest Management Program to be funded by the Approval Holder using registered Pest Management Contractor.
3. Koala Exclusion / Directional Fencing – At offset conflict location	Currently the proposed offset land is severed by Springfield-Greenbank Arterial Road. The road design includes a number of natural barriers to fauna movement (Large cut / Fill road batters), however retains no fencing at the key location where a bridge has been constructed.	Decrease koala / vehicle conflict opportunities at key locations along the road.	Construct Koala Exclusion / Directional Fencing at bridge crossing access point. Estimated 200 Lineal metres of fencing is required to cover exposure point and link to existing natural barriers.	GPS extent and photographs of constructed Fauna Exclusion / Directional Fencing. Annual check of fence integrity during offset period.	Fence constructed within 2 years from the commencement of the action <i>(Timeframe to allow for permission and approvals required by Local and State Government to install fencing on their land holdings)</i>	Reporting as built in the 2 nd ACR for the project. Fence inspection annually confirming integrity reported as part of the project ACR.	Cost of fencing, inclusive of necessary applications and approvals to be funded by the Approval Holder
4. Koala Habitat Replanting and Regeneration	At existing major erosion points and areas of extensive weed removal revegetation, inclusive of koala trees will be reinstated.	Increases in Koala Habitat resources (food and shelter trees)	Reinstated existing degraded areas, and those created through mass weed removal with revegetation, inclusive of koala habitat species.	Number of Koala trees replanted within the offset area = Equal or greater than 750 trees <i>(Estimated between 3-5 ha of land sporadically)</i>	All tree planting complete on or before 3 years post commencement of construction. <i>(Timeframe to allow for weed management measures to</i>	Tree installation reporting within the ACR period for which it occurs. Includes confirmation of total tree milestone	Replanting to be completed by a registered and experienced contractor at the cost of the Approval Holder

				<p>requiring patches and broad areas of revegetation – Assume koala trees density of 150 trees per ha = total 750 trees)</p>	<p>occur prior to some areas of resulting tree planting)</p>	<p>achieved on or prior to 3rd ACR. Success of tree planting and survival rates reporting on annually for period of the offset reporting.</p> <p>(note 750 trees is the minimum outcome meaning additional trees will need to be planted to account for stock failure or other losses)</p>
<p>5. Reduce unlawful access and use of the Offset land by 4wd, trail bikes and all terrain vehicles (ATV)</p>	<p>Current the offset land includes a number of unlawful access tracks, entry points resulting in degraded and eroded sections throughout the offset area.</p> <p>6 locations around the periphery of the offset land have been identified as being used to unlawful access into the offset land.</p>	<p>Reduce unlawful access and use by 4wd, trail bikes and ATV</p>	<p>Installation of new or substantial upgrades and extensions to barrier fencing at 6 identified locations of unlawful entry.</p> <p>Maintenance of access point during the offset period to confirm success of barrier works.</p> <p>Alteration and further upgrades to barriers where demonstrated to be unsuccessful.</p>	<p>Documented evidence of barrier installation (working drawings and photographs) provided during ACR.</p> <p>Annual review of installed and upgraded barriers for measurement of success (observation evidence of tyre tracks and damage circumventing barrier structures)</p> <p>Reporting on any adaptive alterations to barriers not shown to be successful (eg extension of fencing where new tracks show access occurring around the fence.)</p>	<p>2 barriers completed every 2 years. All 6 barriers constructed and operational with 6 years of the commencement of the action.</p>	<p>Evidence of barrier installation, monitoring and success provided to DoEE as part of relevant ACR.</p>
<p>6. Overall Improvement of the quality of the offset area from and 8 to a 9.</p>	<p>Offset condition values at 8 out of 10 under the <i>Guide to Determining Terrestrial Habitat Quality</i> – Queensland Department of Environment and Heritage Protection.</p> <p>Value score is derived from 6 transects completed through the Offset Area.</p>	<p>Improve the quality from an 8 to a 9. (10% improvement)</p>	<p>By measure of achieving a 9 out of 10 average score at the 6 transect locations from surveys completed in accordance with the <i>Guide to Determining Terrestrial Habitat Quality</i> – Queensland Department of Environment and Heritage Protection.</p>	<p>Transect Data collected at 5 year intervals for the life of the offset.</p>	<p>Achieve a 9 out of 10 at the 10 year ACR and maintained for the life of the approval.</p>	<p>Transect data to be presented in a report completed in accordance with <i>Guide to Determining Terrestrial Habitat Quality</i> – Queensland Department of Environment and Heritage Protection and to form part of the ACR every 5th year.</p>

Offset site map

2.0 FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (COORDINATES)



NOTES
 This site map is prepared as a planning assessment tool. The information on this plan is not suitable for any other purpose. Property boundaries, urban numbers of lots and contours and other general features shown have been compiled from existing information and they may have been updated by field work. These may need to be updated if the development application is approved and development proceeds, and may change when a full set of site information is available to support a development approval. Conditions for release should be placed on the information in this plan for bracketed items or for any bracketed headings involving the word "contours" should state the date of the release and any liability for any error or damage and/or loss or damage to any party arising or relying upon this plan for any purpose other than as a disclosure prepared for the use of the person or persons applying for the development application or who may be related to the person beyond the control of the boundaries. This is not an approval.

Upper Scale: 1:10,000 (Layer 240) City Information Service 2016
 Name: Springfield 2016

This site is a regular part of the business transactions of the plan and any part of it which is not being included in the map will be included in the next issue of the map, which will be available for sale.

- LEGEND**
- Old DCDB
 - Springfield offset area (396 ha)
 - Springfield Rise (land lease) offset component (293 ha)
 - Proposed First Nine offset (89.5 ha)

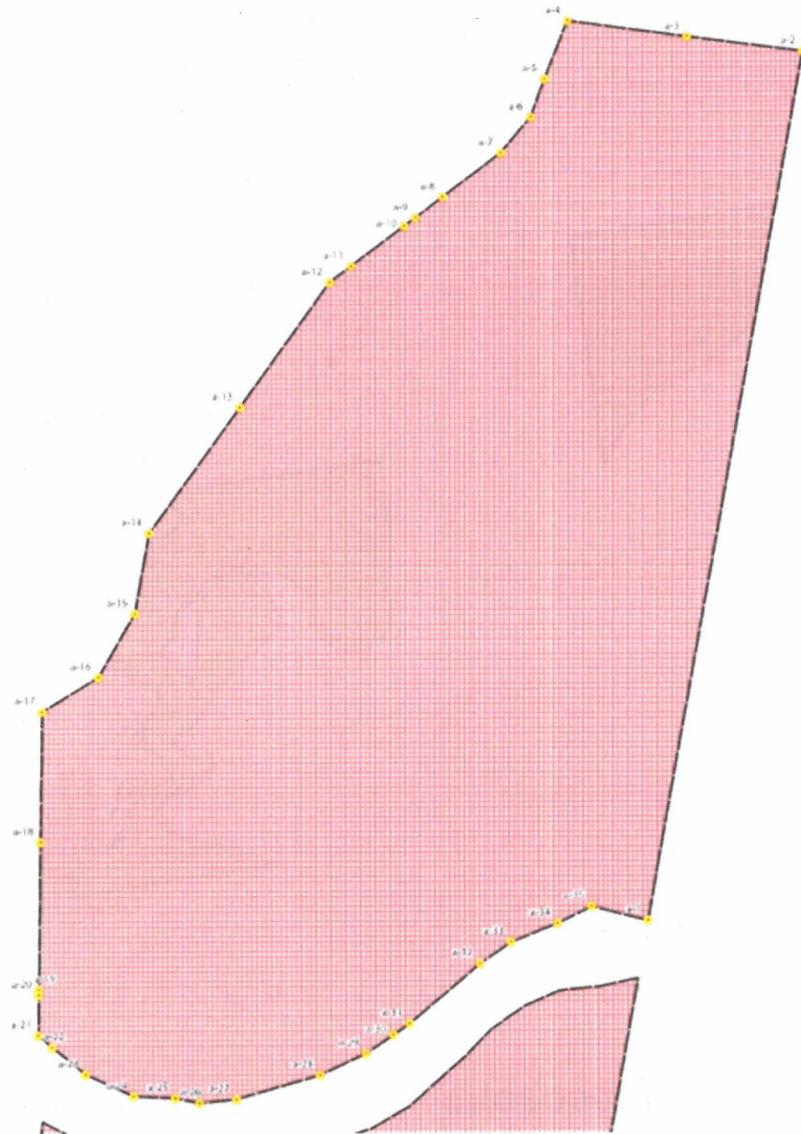
Sheet	Area	Description	Sheet	Offset
S	1/2/2017	Area 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100	71	89.5
C	1/2/2017	Area 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100	72	89.5
D	1/2/2017	Area 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100	73	89.5
E	1/2/2017	Area 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100	74	89.5



FIRST NINE, SPRINGFIELD

ADDRESS/RPO: Springfield QLD 4474
 SA 10/2017 7/2017 & Old Proposed Offset Counts 1

2.1 FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (AREA A)



Area A Coordinates Table (GDA94 MGA z56)		
ID	Longitude	Latitude
a-1	152.927692733	-27.6851098122
a-2	152.928875145	-27.6792204446
a-3	152.927996038	-27.6791181439
a-4	152.927088688	-27.6790080002
a-5	152.926913288	-27.6794012662
a-6	152.926806278	-27.6796579000
a-7	152.926577465	-27.6798989552
a-8	152.926337244	-27.6801975778
a-9	152.925929967	-27.6803384008
a-10	152.925846156	-27.6803991111
a-11	152.925442744	-27.6806680450
a-12	152.925280444	-27.6807778450
a-13	152.924599633	-27.6816246993
a-14	152.923909045	-27.6824750563
a-15	152.923800911	-27.6830056338
a-16	152.923522434	-27.6834557442
a-17	152.923096244	-27.6836902886
a-18	152.923082377	-27.6845738995
a-19	152.923066831	-27.6855645047
a-20	152.923066267	-27.6856004814
a-21	152.923061945	-27.6858758895
a-22	152.923167929	-27.6859581020
a-23	152.923420638	-27.6861422660
a-24	152.923784778	-27.6862907009
a-25	152.924100244	-27.6863042661
a-26	152.924785545	-27.6863362676
a-27	152.924966367	-27.6863117563
a-28	152.925201012	-27.6861499450
a-29	152.925546967	-27.6860047100
a-30	152.925756266	-27.6858780825
a-31	152.925879579	-27.6858034767
a-32	152.926415501	-27.6853948448
a-33	152.926651500	-27.6852516568
a-34	152.927005700	-27.6851264122
a-35	152.927764932	-27.6850142435

NOTES:
 This plan was prepared as a design assessment tool. The information on this plan is not suitable for any other purpose. Property dimensions shown, boundaries of lots and contours and other physical features shown have been compiled from existing information and may not have been verified by field survey. They may need to be checked. The developer is responsible for approved and development proceeds and the change when a full survey is undertaken or a site is occupied. A development approval condition, if any, should be obtained to the information on this plan for finalised design or for any financial dealings involving the land. Saunders Havill Group, the firm, does not accept any liability for any loss or damage whatsoever which may be incurred arising from any party using or relying upon this plan for any purpose other than as a document prepared for the sole purpose of accompanying a development application, and which may be subject to alteration beyond the control of the Saunders Havill Group, unless a development approval states otherwise. This is not an approved plan.

Layer Codes: 001 (01 Layer) 220 (Site Information) 2019 (Area) 2010 (2010)

* This plan is an integral part of the plan. Reproduction of this plan in any part or in full without the notes being included is null and void. The information does not constitute a contract and is not suitable for use.

LEGEND

- 001 DC/08
- Springfield offset area (396 ha)
- Proposed First Nine offset (89.5 ha)
- Proposed First Nine offset bounding coordinates (GDA94 MGA zone 56)

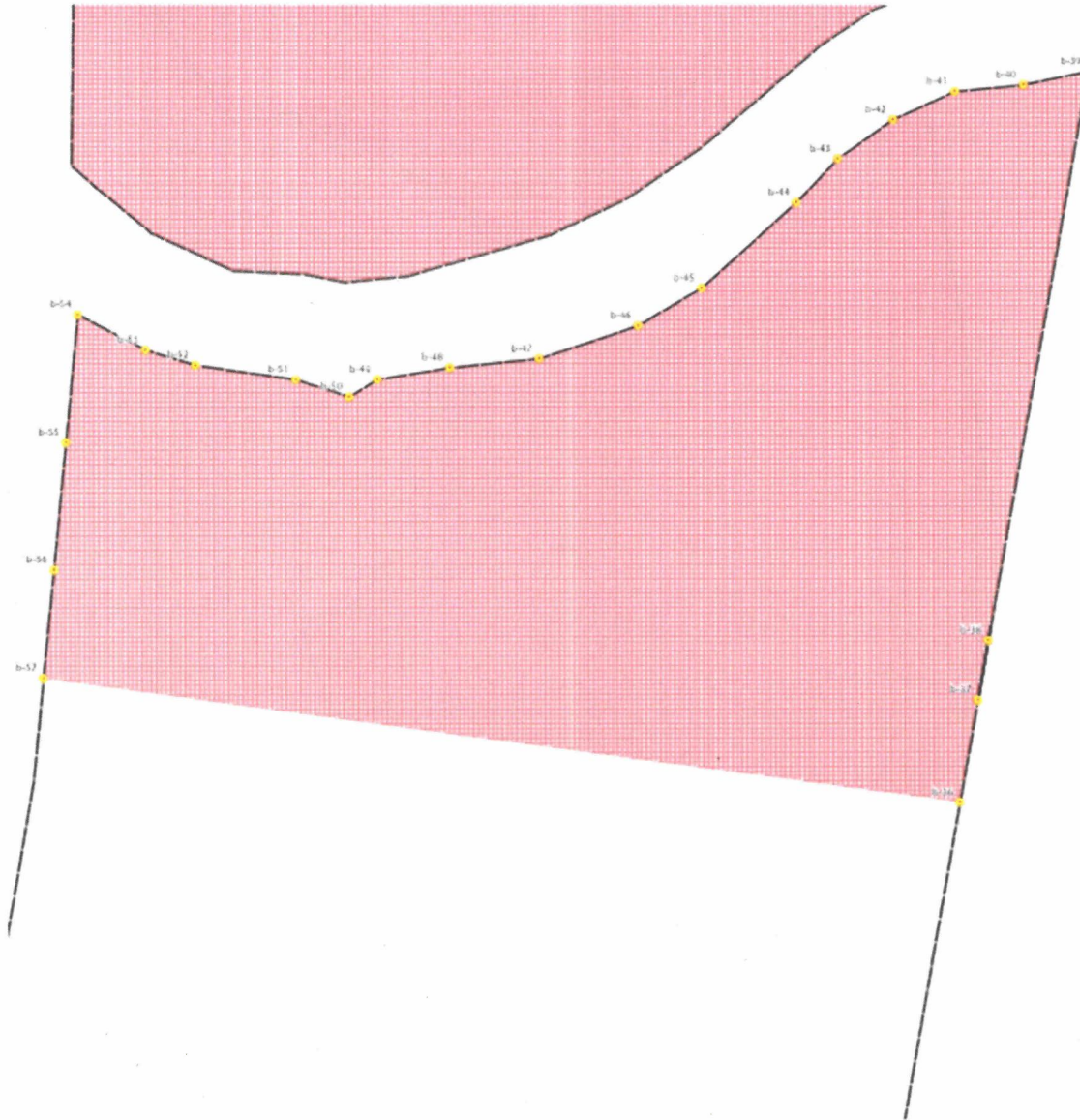
Code	Area	Description	Layer	Color
0	1000000	Area Code	001	001
1	1000000	Proposed Offset	001	001
2	1000000	Proposed Offset	001	001
3	1000000	Proposed Offset	001	001
4	1000000	Proposed Offset	001	001
5	1000000	Proposed Offset	001	001



FIRST NINE, SPRINGFIELD



2.2 FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (AREA B)



NOTES
 This plan was prepared as a design assessment tool. The information on this plan is for guidance only. Other purposes, property dimensions, areas, numbers of lots and contours and other proposed features shown have been considered but are not guaranteed and may not have been verified by field survey. These notes should not be used for the development of applications or approved and developed proposals and may change when a full set of site conditions or in order to comply with development & approval conditions. If a reliance should be placed on the information on this plan for detailed design or for any financial dealings involving the land, Saunders Havill Group, its directors, officers, employees, agents or any other persons, shall not be liable for any loss or damage, whether or not such loss or damage is foreseeable, arising from any party using or relying upon this plan for any purpose other than as a document prepared for the sole purpose of illustrating a development application and which may be subject to alteration beyond the control of the Saunders Havill Group, unless a development & approval states otherwise. This is an approved plan.

Layer Sources: GDA94 Layers / GDA94 Geometric Services 2016; New Zealand 2016.

This plan is an integral part of the planning. Reproduction of this plan in any part or in full without the title being included in full will make the information of use in such reproduction unreliable and not suitable for use.

- LEGEND**
- GIS DCDB
 - Springfield offset area (396 ha)
 - Proposed First Nine offset (89.5 ha)
 - Proposed First Nine offset bounding coordinates (GDA94 MGA zone 56)

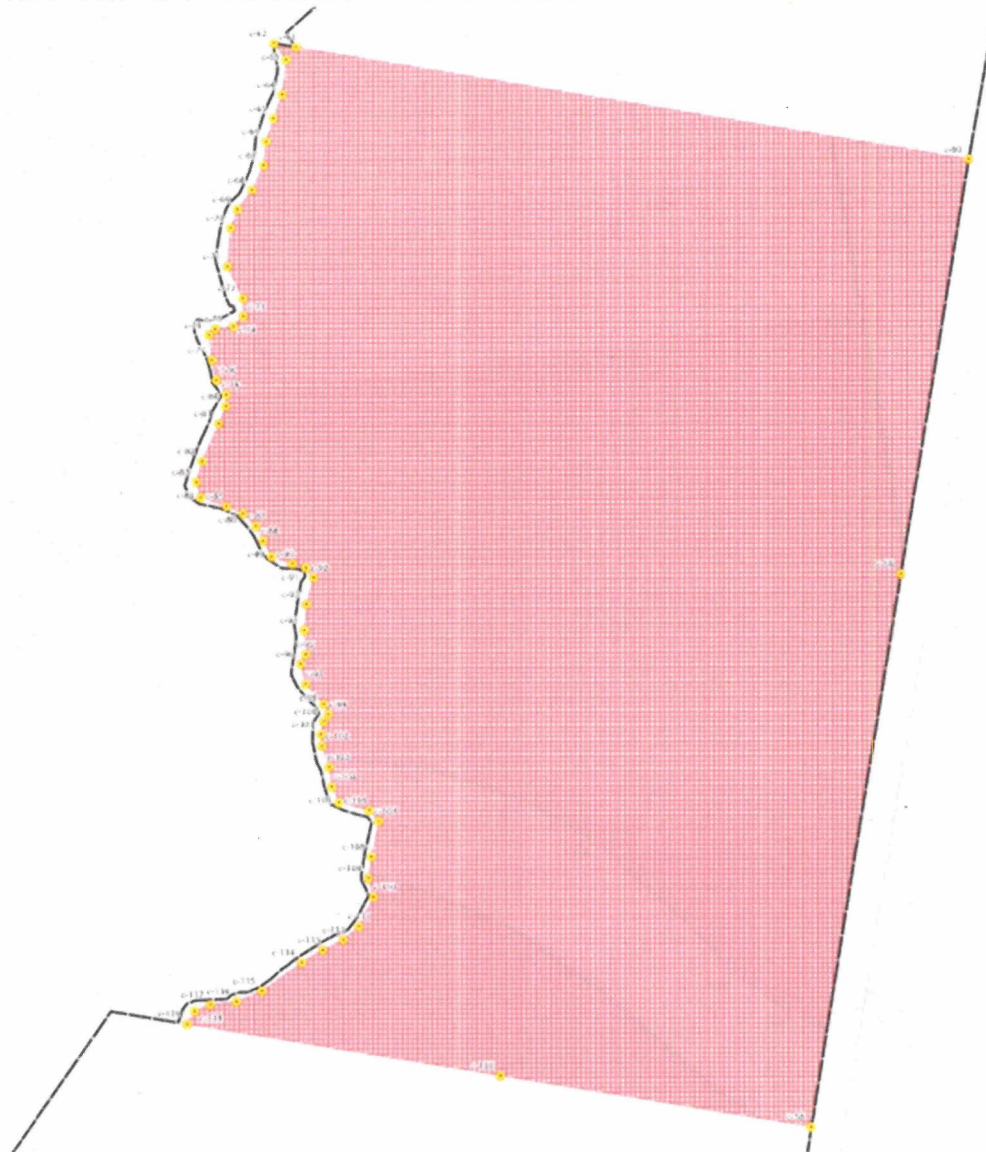
Area B Coordinates Table (GDA94 MGA z56)		
ID	Longitude	Latitude
b-36	152.927030235	-27.6884093009
b-37	152.927112188	-27.6880011622
b-38	152.927159519	-27.6877653128
b-39	152.927614778	-27.6854981110
b-40	152.927323617	-27.6855529250
b-41	152.927015856	-27.6855797620
b-42	152.926739380	-27.6856923330
b-43	152.926491097	-27.6858485790
b-44	152.926305376	-27.6860216260
b-45	152.925879471	-27.6863607990
b-46	152.925595269	-27.6865103620
b-47	152.925151177	-27.6866412910
b-48	152.924752891	-27.6866763530
b-49	152.924429521	-27.6867225540
b-50	152.924302146	-27.6867908390
b-51	152.924063385	-27.6867227700
b-52	152.923615515	-27.6866658110
b-53	152.923392095	-27.6866056550
b-54	152.923089094	-27.6864647870
b-55	152.923033744	-27.6869721260
b-56	152.922978200	-27.6874812920
b-57	152.922929863	-27.6879107804



FIRST NINE, SPRINGFIELD



2.3 FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (AREA C)



Area C Coordinates Table (GDA94 MGA z50)		
ID	Longitude	Latitude
c-58	152 924915467	-27 6995800778
c-59	152 925699867	-27 6953089357
c-60	152 926289869	-27 6939882820
c-61	152 920250046	-27 6931998196
c-62	152 920256771	-27 6911700740
c-63	152 920363471	-27 6912981090
c-64	152 920328612	-27 6915704920
c-65	152 920253426	-27 6917554740
c-66	152 920189790	-27 6919353320
c-67	152 920166545	-27 6921209510
c-68	152 920068257	-27 6923104670
c-69	152 919941112	-27 6924994420
c-70	152 919883274	-27 6926933270
c-71	152 919854179	-27 6928931400
c-72	152 919808007	-27 6931481960
c-73	152 919992477	-27 6932869700
c-74	152 919905782	-27 6933652320
c-75	152 919748993	-27 6933844920
c-76	152 919692114	-27 6934807140
c-77	152 919719733	-27 6936255720
c-78	152 919755712	-27 6937798340
c-79	152 919841149	-27 6938933730
c-80	152 919840095	-27 6939833980
c-81	152 919777723	-27 6941204520
c-82	152 919633113	-27 6944117100
c-83	152 919584863	-27 6945744830
c-84	152 919623278	-27 6946944670
c-85	152 919846642	-27 6947631480
c-86	152 919889990	-27 6948218200
c-87	152 920099611	-27 6949161590
c-88	152 920162112	-27 6950318960
c-89	152 920234051	-27 695153080
c-90	152 920417085	-27 6952120290
c-91	152 920532584	-27 6952420850
c-92	152 920599915	-27 6953192650
c-93	152 920537189	-27 6955216420
c-94	152 920522608	-27 6957250390
c-95	152 920512055	-27 6959113850
c-96	152 920489229	-27 6959852050
c-97	152 920512495	-27 6961407070
c-98	152 920690663	-27 6962950680
c-99	152 920729101	-27 6963765100
c-100	152 920890059	-27 6964321960
c-101	152 920666419	-27 6965307440
c-102	152 920673956	-27 6966231670
c-103	152 920731623	-27 6967861950
c-104	152 920757577	-27 6969404740
c-105	152 920820050	-27 6970647870
c-106	152 921084747	-27 6971249360
c-107	152 921166609	-27 6972106770
c-108	152 921103746	-27 6974831890
c-109	152 921074741	-27 6976503060
c-110	152 921117954	-27 6977960240
c-111	152 920992643	-27 6980230730
c-112	152 920857795	-27 6981256470
c-113	152 920679651	-27 6982028720
c-114	152 920496672	-27 6982970390
c-115	152 920151561	-27 6985180120
c-116	152 919928469	-27 6985966790
c-117	152 919704571	-27 6986215340
c-118	152 919567414	-27 6986695220
c-119	152 919523205	-27 6987684890
c-120	152 922217667	-27 6991755999

NOTES
 This plan was prepared as a zoning assessment tool. The information on this plan is not suitable for any other purpose. Property dimensions, street numbers, lot and corner and other physical features shown have been compiled from existing data and may not have been verified by field survey. These may need to be checked. The development application is approved and developer proceeds and may change when a full survey is undertaken in order to comply with development approval conditions. No reliance should be placed on the information on this plan for detailed design or for any financial dealings involving the land. Saunders Havill Group therefore disclaims any liability for any loss or damage whatsoever or howsoever incurred, arising from any error or omission appearing on this plan for any purpose other than as a document prepared for the sole purpose of accompanying a development application, and which may be subject to alteration beyond the control of the Saunders Havill Group. Unless a developer is approved states otherwise, this is not an approvalable.

Layer Source: GDA94 Layer GDA94 GDA94 MGA z50
 Date: 2016
 The site is an integral part of its geographic representation of the plan or any part of it and is not to be used for any other purpose. It is not to be used for any other purpose, including but not limited to, use as a cadastral or other legal document.

LEGEND

- GDA94 MGA z50
- Springfield offset area (396 ha)
- Proposed First Nine offset (89.5 ha)
- Proposed First Nine offset bounding coordinates (GDA94 MGA zone 56)

ID	Date	Description	Drawn	Checked
1	12/08/17	New City address	TS	MS
2	12/08/17	Bounding offset	MS	MS
3	12/08/17	Update street	TS	MS
4	12/08/17	2nd Year offset area	TS	MS
5	09/09/17	GDA94 MGA z50	TS	MS

Filename: W:\saunders\1081196_1081196_1081196.dwg
 Date: 12/08/17



FIRST NINE, SPRINGFIELD



2.4 FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (AREA D)



Area D Coordinates Table (GDA94 MGA z56)		
ID	Longitude	Latitude
d-121	152.874297866	-27.6814457241
d-122	152.874233553	-27.6806078836
d-123	152.873728707	-27.6806335670
d-124	152.872872397	-27.6806343570
d-125	152.872965246	-27.6795904260
d-126	152.872634128	-27.6786739010
d-127	152.872139208	-27.6785999760
d-128	152.872123457	-27.6787441450
d-129	152.872075871	-27.6788792980
d-130	152.871958956	-27.6790470410
d-131	152.871874727	-27.6792155130
d-132	152.871735245	-27.6793873090
d-133	152.871560030	-27.6796792140
d-134	152.871503599	-27.6797781070
d-135	152.871460102	-27.6799089310
d-136	152.871408947	-27.6800331100
d-137	152.871368393	-27.6802466360
d-138	152.871361241	-27.6804461180
d-139	152.871411070	-27.6807509140
d-140	152.871460490	-27.6809160340
d-141	152.871578299	-27.6811556000
d-142	152.871708289	-27.6813027190
d-143	152.871888131	-27.6815551220
d-144	152.872088313	-27.6817711220
d-145	152.872279920	-27.6819566120
d-146	152.872443192	-27.6821164340
d-147	152.872555211	-27.6822875810
d-148	152.872499831	-27.6825091390
d-149	152.872464947	-27.6827169950
d-150	152.872367539	-27.6829158890
d-151	152.872324727	-27.6831648650
d-152	152.872379825	-27.6833452060
d-153	152.872493878	-27.6834433380
d-154	152.872654259	-27.6835163830
d-155	152.872816980	-27.6835323270
d-156	152.872997805	-27.6835180820
d-157	152.873144962	-27.6834395080
d-158	152.873320438	-27.6833471950
d-159	152.873438843	-27.6832779710
d-160	152.873554260	-27.6830427720
d-161	152.873674795	-27.6828714680
d-162	152.873761505	-27.6826775820
d-163	152.873812132	-27.6825155240
d-164	152.873798653	-27.6824266020
d-165	152.873802632	-27.6822327230
d-166	152.873847961	-27.6820387470
d-167	152.873864435	-27.6817640740
d-168	152.873959139	-27.6816029830
d-169	152.874115735	-27.6814598440

NOTES
 This plan was prepared as a desktop assessment tool. The information on this plan is not suitable for any other purpose. Property dimensions, corner numbers or lots and contours and other physical features shown have been compiled from existing files and may not have been verified by field survey. These may need to be checked. The developer's application is required and development of any kind may proceed when a field survey is undertaken in order to comply with development approval conditions. No reliance should be placed on the information on this plan for detailed design or for any financial design, including the landowner's final design. The landowner remains fully liable for any loss of damage, settlement or otherwise incurred arising from any party using or relying upon this plan for any purpose other than as a document prepared by the landowner prior to acceptance by a development application. An ethics report is required by the landowner prior to the submission of a development application. A development application is required prior to any development of any kind. This plan is not a map and does not constitute a map under the Mapping Act 2011.

Layer Sources: GDA94 Layer (GDA94) - Information System 2011, Area 10/20/2011

Notes: This plan is an integral part of the desktop assessment of the plan and any part of it which is not being included in a plan will render the plan invalid. If any such application is made and not suitable for use.

LEGEND

- GDA94 MGA
- Springfield offset area (1396 ha)
- Proposed First Nine offset (89.5 ha)
- Proposed First Nine offset bounding coordinates (GDA94 MGA zone 56)

Date	Author	Description	Version	Status
11/01/2011	SA	Area offset updated	1.1	AS
11/01/2011	SA	Area offset updated	1.2	AS
11/01/2011	SA	Area offset updated	1.3	AS
11/01/2011	SA	Area offset updated	1.4	AS
11/01/2011	SA	Area offset updated	1.5	AS

Version Number: 1.5 (11/01/2011) 1:1000 @ A4



FIRST NINE, SPRINGFIELD





EPBC Ref: 2016/7676

s47F

Director
Springfield Land Corporation
PO Box 4167
SPRINGFIELD QLD 4300

Dear s47F

**Decision on approval
First Nine Master Planned Residential Development, Brookwater, Qld (EPBC 2016/7676)**

I am writing to you in relation to a proposal to construct the First Nine master planned residential development in Ipswich, Queensland.

I have considered the proposal in accordance with Part 9 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and have decided to grant an approval to Springfield Land Corporation Pty Limited. The details of my decision are attached. The proposal must be undertaken in accordance with the conditions specified in the approval.

I would appreciate your assistance by informing me when you commence the action and who will be the contact person responsible for the administration of the approval decision.

You should also note that this EPBC Act approval does not affect obligations to comply with any other laws of the Commonwealth, state or territory that are applicable to the action. Neither does this approval confer any right, title or interest that may be required to access land or waters to take the action.

The Department has an active audit program for proposals that have been referred or approved under the EPBC Act. The audit program aims to ensure that proposals are implemented as planned and that there is a high degree of compliance with any associated conditions. Please note that your project may be selected for audit by the Department at any time and all related records and documents may be subject to scrutiny. Information about the Department's compliance monitoring and auditing program is enclosed.

If you have any questions about the process, please contact the project manager, s22 by email to s22 @environment.gov.au, or telephone s22 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

James Barker
Assistant Secretary
Assessments and Governance Branch

9 January 2018