

## Part C - Preliminary Documentation

### Submissions Response Memo

Ripley Residential Development Project, Ripley  
Queensland (EPBC 2024/09865)

15 April 2026

Ref 11826 E

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### Introduction

Pursuant to Section 95A(3) of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and direction to publish from the Department of Climate Change, Energy, the Environment and Water (DCCEEW), HB QLD Pty Ltd commenced the public notification process for the Ripley Residential Development Project, Ripley Queensland (EPBC 2024/09865)

Public comments were invited on 18 March 2026 through 1 April 2026. A single submission was received during the public notification period which outlines the submitters concerns that the offset may not adequately compensate for impacts on protected matters as the Offset Management Plan (OMP) has not:

- justified the core indicator weightings used to score habitat quality;
- justified the factors and weighting used to score core indicators;
- accounted for additionality;
- addressed scientific uncertainty;
- given confidence in confidence in result; and
- demonstrated the suitability of the securing mechanism.

Key items raised by the submitter are addressed below with cross reference to sections of the OMP where updates have been made in response to the submission.

### Comment Response

#### Justification of the core indicator weightings and factors

##### Comment

**In the absence of approved and published EPBC policy statement/s for scoring Koala and Grey-headed Flying-fox (GHFF) habitat, the OMP must explain the ecological basis for % weighting attributed to site condition, site context and species stocking rate, as well as to the parameters that comprise the core indicators. The OMP should provide evidence and the ecological basis on why it was decided:**

- **for Koala, the factors that comprise site condition and site context have equal weightings of 30% of the final score, and why the balance of the weighting (40%) is attributed to species stocking rate; and**



- **for GHFF, site condition is weighted at 40%, site context weighted at 30% and species stocking rate weighting 30%.**

### Response

Weighting of site condition, site context and species stocking rates for Koala and GHFF were assigned in consultation with DCCEE with the same weightings utilised across several projects undergoing EPBC Act assessment going back to at least 2020. While the assigned weightings are standard for koala and GHFF habitat quality assessment under the EPBC Act it is acknowledged further evidence supporting the weightings could be provided. The following has been added to section 4.1.1 of the PD Report to support weightings for the koala:

*The EPBC Act Offset Assessment Guide (OAG) requires habitat scores to be input as a whole number out of 10 to quantify impacts and assess existing and future offset site value. To achieve this, weightings have been provided to the three components that contribute to the calculation of habitat quality:*

- *Site condition and context will each be given a weighted score of 3/10.*
- *Stocking rate will be given a weighted score of 4/10.*

*The weighting of site condition and context is justified by several studies (McAlpine et al. 2006; Harwood et al. 2025) that have found that preferred Koala food tree and landscape level tree cover are key factors driving koala habitat use and distribution. The study by Harwood et. al. (2025) found no difference in Koala preference between mature habitat and previously disturbed rehabilitated habitat with healthy breeding populations observed in the rehabilitation areas. Whisson et al (2023) confirmed the overarching importance of landscape-scale factors in determining koala site occupancy and distribution in modified landscapes. The study found that the probability of Koala presence was positively influenced by landscape scale tree cover and negatively influenced by road density.*

*The weighting of stocking rate is justified as it is the representation of the matter being significantly impacted. The matter being impacted and offset is the Koala therefore it is imperative that impact and offset sites can contain Koala populations now or in the future.*

The following has been added to section 4.2.1 of the PD Report to support weightings for the GHFF:

*The habitat quality assessment weightings adopted for the Grey-headed Flying-fox — 40% Site Condition, 30% Site Context and 30% Species Stocking Rate — reflect the ecology of the species as a highly mobile, nomadic nectar- and fruit-feeding mammal whose habitat use is governed by resource quality and landscape-scale habitat availability (Welbergen et al. 2020; Vanderduys et al. 2024).*

*Site Condition is weighted highest (40%) as local foraging habitat quality is a primary determinant of habitat use, energetic efficiency, and short-term site fidelity in GHFF. Telemetry-based studies demonstrate that individuals preferentially forage in habitats with higher-quality and more reliable floral resources, even within heavily modified landscapes (Yabsley et al. 2021). Resource quality—through factors such as canopy condition, food tree availability, and flowering productivity—directly influences visitation frequency and foraging intensity, underpinning the functional value of a site as foraging habitat (Grady et al. 2024).*

*Site Context is weighted at 30% to reflect the importance of landscape-scale attributes, including surrounding habitat availability, disturbance history, and the capacity of a site to function within a broader foraging network. While GHFF exhibits extreme mobility and long-distance movements across its range,*



*studies show that individuals restrict nightly foraging to comparatively small core areas when suitable resources are available (Welbergen et al. 2020; Boardman et al. 2021).*

*Species Stocking Rate is weighted at 30% to account for actual or inferred use of the site by the population, rather than habitat structure alone. Incorporating Stocking Rate allows the assessment to distinguish between habitat that is structurally suitable and habitat that is demonstrably important to the species at relevant temporal scales, while recognising the species' low roost fidelity and nomadic population dynamics (Welbergen et al. 2020).*

#### Comment

**The assessment of site condition potentially misrepresents the value of the site to the species, overestimating the start and future quality through parameters not directly relevant to Koala and GHFF habitat value - such as coarse woody debris, organic litter and the presence/density of non-perennial ground layer species.**

#### Response

While the comment references GHFF, it is assumed it applies only to koala as the GHFF site condition assessment method does not use any of the parameters identified.

The site parameters listed are taken from the Queensland State Government's '*Guide to determining terrestrial habitat quality: A toolkit for assessing land based offsets under the Queensland Environmental Offsets Policy*' Version 1.2 which utilises several attributes and assessment methods from the BioCondition Assessment Manual v2.2 (Eyre et al 2015). Although koalas are predominantly arboreal, ground-layer attributes such as coarse woody debris, organic litter and ground-layer vegetation contribute meaningfully to the general functionality of the habitat by influencing factors such as movement behaviour, thermoregulation, soil condition, forest productivity and long-term food tree viability.

It is agreed that, while these attributes play a part in general habitat functionality, they do not have provide as much benefit to koala as features such as foraging species. This is reflected by the weightings imbedded in the habitat quality assessment where attributes relating to understorey conditions, such as those identified in the comments and shrub and grass species richness, only account for 35 of the possible maximum score of 100 for site condition. This is approximately 10% of the overall habitat quality score, which is considered appropriate.

## **Accounting and additionality**

#### Comment

**Four of the six management strategies, Non-native Vertebrate Pest Management (targeting Wild Dogs), Management of Weeds of National Significance, Bushfire Management and Fencing and Signage, should not be considered additional to current actions and obligations. Any reasonable person would expect, and a responsible land manager be implementing, pest animal, weed, bushfire and access control measures. Where management actions and obligations exist, such as under local and state government duty of care requirements, regardless of whether they are complied with, those actions should not be considered additional.**

#### Response

There is no legal requirement for land managers to undertake non-vertebrate pest management or weed management on their properties. In Queensland, the *Biosecurity Act 2014* requires land holders to take all



reasonable steps to ensure they do not spread a pest, disease or contaminant. There is no requirement to treat Weeds of National Significance (WONS) across an entire property and keep coverage below 10%, which is the outcome of the management action. While land managers at cattle properties such as the proposed offset area (Mount View) would undertake occasional wild dog management it would only be in response to dog attacks on stock. Systematic annual management as required by the OMP is not part of general management of a cattle property.

Similarly, while fencing and bushfire management currently occur at the Mount View offset site the level of implementation proposed in the OMP far exceed normal operations at the cattle property. Management measures include installation of additional fencing to exclude cattle from areas they currently graze, allowing native regrowth to establish. Bushfire management for native woodland (the endpoint of the offset site) is also more intensive than management of a cattle property which is largely cleared with bushfire managed by allowing cattle to graze in areas where regrowth is occurring.

It should be noted that non-vertebrate pest management, bushfire management and fencing do not directly contribute to proposed increases in habitat values at the offset site, however they are considered essential to establishing and maintaining good quality habitat for koala and GHFF. Weed management only contributes 1.5% to the proposed increase in habitat values at the offset site, which is considered appropriate.

Existing land management practices at the Mount View offset site are outlined in section 5.3 of the OMP.

#### Comment

**Habitat quality scores should only account for management actions that directly benefit the species, and that are additional to business-as-usual obligations and/or actions over the foreseeable future. These would be for Habitat Creation and Regeneration where passive/natural regeneration is insufficient, and active intervention is required.**

#### Response

See response to the previous comment. Proposed habitat creation will provide an increase in habitat values through a mix of active and passive regeneration. As noted in section 8.7.2 of the OMP:

*Key management actions will include assisted natural regeneration practises to expand patches of regrowth throughout areas where high levels of weed management are required (OMU 1) and reconstruction and infill planting within the non-remnant areas to assist in vegetation coverage and composition (OMU2).*

A detailed Rehabilitation Management Plan will guide on ground rehabilitation works and was included as Appendix F to the OMP.



## Scientific uncertainty

### Comment

**The OMP and rehabilitation plan at Appendix F do not provide scientific certainty per se, rather opinion, that the OMP will achieve the desired timebound outcomes. Therefore, the OMP is not scientifically robust, nor does it enable a decision that is informed by scientifically robust information and incorporate the precautionary principle in the absence of scientific certainty.**

### Response

The OMP and rehabilitation plan are not just based on opinion, they utilise industry best practice standards for ecological restoration. Specifically, proposed methods are taken from the South East Queensland Ecological Restoration Framework (SEQERF), which was developed using substantial research of rehabilitation projects in South East Queensland. The SEQERF has been endorsed and adopted by the majority of local and state government entities in the region.

To further support the scientific rigour associated with implementation of the offset a review has been carried out on studies assessing the success of koala habitat restoration. The following passage has been added to section 8.7.1 of the OMP.

*A range of recent studies demonstrate that rehabilitation of disturbed land can successfully provide functional habitat for koalas when rehabilitation is appropriately designed and implemented.*

*Cristescu et al. (2013) investigated koala use of post-mining rehabilitated areas on North Stradbroke Island and found that koalas actively re-occupied rehabilitated sites less than 15 years old. Individuals using rehabilitated areas accessed suitable food and roost trees, exhibited good body condition, and demonstrated high reproductive output, with no discernible difference in predation when compared to adjacent undisturbed habitats. The study concluded that rehabilitated sites were capable of providing habitat comparable to undisturbed environments.*

*Other studies support these findings. FitzGibbon et al. (2012) recorded koala recolonisation of rehabilitated mine landscapes in central Queensland, identifying availability of suitable food tree species and proximity to existing koala populations as key determinants of successful habitat use. Where these elements were present, rehabilitated areas were utilised by koalas.*

*Guidance for revegetating koala habitat developed by the Australian National University (Beale et al. 2022) carried out a review of peer-reviewed literature finding that rehabilitated habitats can contribute meaningfully to koala conservation where revegetation incorporates preferred food tree species, sufficient structural complexity, and landscape connectivity.*

*Overall, the available scientific evidence demonstrates that rehabilitation of disturbed areas can provide suitable koala habitat, provided that rehabilitation targets species composition, structure and connectivity consistent with koala ecology.*



## Confidence in result

### Comment

**The OMP claim 85% confidence in result for all Koala and GHFF outcomes, except for GHFF at assessment unit 3 (75%). Confidence in result should be based on experimental design, measurements, technical memoranda and peer reviewed reports and papers demonstrating attainment of the values for specified parameters at 'like' sites. The PD/OMP fail to adopt any industry standard, regulator approved, or authoritative framework to evaluate the evidence and knowledge it uses to support claimed offset outcomes, and confidence in result.**

**A framework such as the Intergovernmental Panel on Climate Change's (IPCC) July 2010 Guidance Note on Consistent Treatment of Uncertainties, particularly the Agreement/Evidence matrix in Figure 1 of the guidance should be used as a basis for attributing a confidence level.**

### Response

This comment is similar to the previous one on scientific uncertainty as it requests additional evidence to support the outcomes proposed by the OMP. As identified in the response to that comment, significant peer review data exists demonstrating koalas will utilise rehabilitated areas subject to appropriate design such as the use of preferred foraging species.

In addition to koala, multiple studies have shown that flying-foxes (including GHFF) routinely forage in human-modified and restored environments, including revegetated landscapes, provided that appropriate food resources are present.

Yabsley et al. (2021) demonstrated that GHFF extensively utilise human-modified landscapes, including revegetated areas and planted vegetation, where flowering and fruiting resources are available. The study found that habitat usage by GHFF was more strongly related to resource distribution and quality than to land-use category, indicating that restored habitats can function effectively as foraging habitat once larger forage trees are established.

Similarly, McConkey and Drake (2015) and Markus and Hall (2004) showed that flying-foxes rapidly respond to the establishment or flowering of suitable food trees, irrespective of whether vegetation is remnant or restored, highlighting the capacity for rehabilitated landscapes to contribute meaningfully to foraging habitat availability.

The measures outlined in the OMP ensure the offset area will be delivered in a manner that will provide suitable habitat for koala and GHFF.

The Intergovernmental Panel on Climate Change's (IPCC) July 2010 Guidance Note on Consistent Treatment of Uncertainties was developed specifically to assist the various authors Fifth Assessment Report to maintain consistency in terminology and process across the document. The guidance was never intended for broader application. It is of note that, while the guidance note provides a structure for describing confidence, the level of confidence assigned comes down to the authors' 'judgement on the validity of findings' and 'the categories defined... can be considered to have fuzzy boundaries'.



However, if the IPCC guidance were to be used it states that 'evidence is most robust when there are multiple, consistent independent lines of high-quality evidence'. As noted above multiple, peer-reviewed studies carried out by separate authors over several locations in Queensland and other areas of Australia demonstrate koala and GHFF use of rehabilitated areas. This would be considered robust evidence with agreement across the several authors. Using the IPCC guidance, the likelihood of the outcome would be considered very likely with a likelihood probability of 90-100%. The confidence levels proposed in the OMP are lower than this demonstrating the precautionary approach of the assessment.

#### Comment

**The commitments to protect the offset for the duration of the impact are ambiguous and unenforceable. Further explanation is required to explain how a VDec or covenant, whether under the Land Act or Land Titles Act, will protect the MVOA offset site, and maintain the future quality/completion criteria, in perpetuity.**

#### Response

Section 8.3 of the OMP states:

*The MVOA will be legally secured prior to commencement of the action via a Voluntary Declaration (VDec) administered under the VMA (Vegetation Management Act 1999).*

*A covenant under either Chapter 6 Part 4 Division 8A of the Land Act 1994 (Qld) or Part 6 Division 4A of the Land Titles Act 1994 (Qld) will be registered within 12 months of commencing the action. If a covenant is not possible an alternative legally binding mechanism will be implemented in consultation with DCCEEW.*

This wording is considered unambiguous and enforceable however it is acknowledged that further information on how these mechanisms will protect the offset area can be added. The following has been added to section 8.3 of the OMP:

*Land subject to a voluntary declaration is mapped as Category A vegetation on a Property Map of Assessable Vegetation (PMAV). Category A vegetation is afforded the highest level of protection under the VMA, meaning:*

- *Clearing is generally prohibited and may only occur if expressly allowed under a development approval, statutory exemption, or restoration order.*
- *The declaration prevents broadscale or incremental clearing that could otherwise occur under general assessment pathway.*

*Any permitted activities must be consistent with the purpose of the declaration (which aligns with the purpose of this OMP) and the broader objectives of the VMA.*

*A covenant under the Land Act 1994 is a statutory, legally binding agreement registered over non-freehold (State-owned) land, such as leasehold land, that imposes ongoing restrictions or obligations on how the land may be used. A covenant can provide strong protection by:*

- *restricting or prohibiting clearing of native vegetation;*
- *limiting infrastructure, buildings or other forms of development;*
- *controlling land-use activities to ensure consistency with conservation objectives; and*
- *requiring land management actions to maintain or enhance ecological values.*

*In the case of the offset area, the covenant will align with the objectives and requirements of the OMP.*



## Conclusion

Pursuant to Section 95A(3) of the EPBC Act and direction to publish from DCCEE, HB QLD Pty Ltd commenced the public notification process for the Ripley Residential Development Project, Ripley Queensland (EPBC 2024/09865) on 18 March 2026 through 1 April 2026. A single submission was received on the action. The submission raised concerns that the OMP had not:

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- demonstrated the suitability of the securing mechanism.

Comments provided in the submission have been summarised and responded to in this memo. The comments resulted in additional information being added to the OMP and Preliminary Documentation Report to provide clarification where required. The location and content of the additions are identified in this memo.



## References

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