

Part C - Preliminary Documentation

Submission Response Memo

Residential Development Project, Bayliss Road, South
Ripley Queensland (EPBC 2025/10110)

11 June 2026

Ref 12186 E

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 Residential Development Project, Bayliss Road South Ripley Queensland (EPBC 2025/10110)

Public comments were invited on Monday 25 May 2026 through Monday 8 June 2026 (5 pm AEST). No submissions were received before the 5 pm deadline however a single submission was received after the deadline had passed. While the submission was provided outside of the regulatory timeframes, HB QLD Pty Ltd have provided a response to the matters raised by the submitter.

The submission raised concerns regarding the adequacy of the proposed environmental offset, including that:

- Koalas are unlikely to benefit from the offset;
- There is no evidence Grey-headed Flying-fox (GHFF) are likely to use the offset;
- The core indicator and factor weightings are not justified;
- Confidence in predicted outcomes lacks scientific certainty; and
- Offset outcomes are not secured for the duration of the impact.

Key items raised by the submitter are addressed below.

Response to Submission

Comment

Koalas are unlikely to benefit from the offset due to the absence of baseline detections and a lack of evidence supporting recolonisation.

Response

As identified in the Preliminary Documentation report, peer-reviewed literature demonstrates that koalas can recolonise rehabilitated vegetation where suitable habitat attributes and landscape context are present. Queensland Wildnet and Atlas of Living Australia records identify 131 confirmed sightings of koala within 10 km of the offset site and 42 within 5 km therefore ample opportunity exists for koalas to colonise habitat created by the offset (refer **Plan C1**).



Cristescu et al. (2013) documented koalas re-occupying rehabilitated mine sites, where individuals had access to adequate fodder and roosting trees, maintained good body condition, and exhibited high reproductive output, with no significant difference in predator density compared to undisturbed areas. Similarly, FitzGibbon et al. (2012) found that recolonisation of rehabilitated habitat is facilitated by the presence of preferred food trees and proximity to existing populations.

Further, guidance under the EPBC Act recognises that unoccupied habitat may still constitute important koala habitat where it retains attributes supporting survival and movement, including connectivity and food tree availability (Youngentob et al. 2021).

In relation to predation risk, recent research (Sparkes et al. 2025; Dissanayake et al. 2023) shows that koalas spend minimal time on the ground; however, this short period accounts for a disproportionate share of mortality, including dog attack and vehicle strike risk. Restoration that increases canopy connectivity and minimising cleared areas between trees reduces the need for ground movement and therefore reduces exposure to these risks.

Accordingly, the scientific literature supports that restoring habitat composition, structure and connectivity improves koala habitat suitability and facilitates recolonisation over time. The assertion that koalas are unlikely to benefit from the offset is not accepted.

Comment

There is no evidence Grey-headed Flying-fox (GHFF) are likely to use the offset site due the distance from an active roost site.

Response

The literature consistently demonstrates that GHFF are highly mobile, nomadic foragers that respond dynamically to the spatial and temporal distribution of food resources. The proposed offset site will be rehabilitated with a range of tree species providing year-round foraging resources for GHFF. This provides a like-for-like offset for impact area which also does not contain a roost and no GHFF were observed during surveys but provides foraging resources for the species.

Long-distance telemetry studies show that GHFF regularly travel hundreds of kilometres, utilise multiple roost sites and undertake rapid movements across landscapes in response to resource availability. More broadly, the species is described as highly mobile and capable of travelling thousands of kilometres annually while exploiting a wide range of habitat types (Roberts et al. 2012). Plan 14 of the Preliminary Documentation Report - PART B, Attachment A4 shows a known roost location within 20 km of the proposed offset area (Kooralbyn (Routley Drive – 551)) with several other records of the species in the area meaning the vegetation within the proposed offset site is likely to provide foraging resources for the species.

Yabsley et al. (2021) demonstrated that human-modified landscapes support a large proportion of the GHFF population year-round, with individuals preferentially selecting higher-quality foraging habitat when available.



Collectively, this evidence demonstrates that:

- GHFF do not rely on fixed foraging sites;
- Foraging behaviour is driven by resource availability; and
- A diverse and seasonally variable resource base contributes to habitat use.

The proposed offset is intended to establish a diversity of flowering and fruiting resources across seasons, contributing to landscape-scale resource availability. While site-specific use cannot be predicted with certainty, the ecological plausibility of GHFF use is supported by the literature.

Comment

The adopted weightings are not supported by scientific evidence.

Response

The scientific literature does not prescribe specific numerical weightings for habitat assessment. Rather, it identifies key ecological drivers of habitat suitability.

For koalas, literature (Law 2018; Smith et al. 2013) consistently demonstrates that:

- Occupancy is strongly influenced by the availability of preferred food trees and habitat quality;
- Landscape-scale habitat extent and connectivity are critical to persistence; and
- Habitat attributes operate across both site and landscape scales.

For GHFF, the literature (Roberts et al. 2013; Yabsley et al. 2021) demonstrates that:

- Habitat use is strongly influenced by food resource availability and quality;
- Landscape context is critical due to high mobility; and
- Habitat use is opportunistic and varies temporally.

The adopted assessment framework reflects these ecological principles through weighting of site condition, landscape context and utilisation potential. While the exact percentages are derived through the judgement of experienced Ecologists, they are consistent with the relative importance of ecological factors identified in peer-reviewed studies. Accordingly, the weightings are considered appropriate.

Comment

Predicted outcomes lack scientific certainty.

Response

Ecological restoration outcomes inherently involve uncertainty. Scientific validity is assessed based on whether predictions are grounded in established principles, supported by evidence, and coupled with monitoring and adaptive management.

The offset is based on:

- Peer-reviewed evidence of koala recolonisation of restored habitat (Cristescu et al. 2013);



- Evidence of GHFF responsiveness to resource availability across landscapes (Yabsley et al. 2021); and
- Established restoration ecology principles linking habitat improvement to species use.

Confidence ratings represent professional judgement informed by this evidence base and are not intended to represent absolute certainty. Monitoring and adaptive management are included to validate outcomes and adjust management where required. Accordingly, any assertion that the offset lacks scientific foundation is erroneous.

Comment

Offset outcomes are not secured for the duration of the impact.

Response

The offset will be legally secured and managed for the duration of the impact to ensure that habitat gains are maintained.

This includes:

- Legal securing of the offset site to prevent incompatible land use;
- Long-term (20 year) implementation of management actions; and
- Ongoing maintenance of habitat condition improvements.

It is acknowledged that clarification of the legal securing mechanism would improve transparency. However, this does not alter the fundamental intent that offset outcomes are to be maintained for the duration of the impact.

Conclusion

Pursuant to Section 95A(3) of the EPBC Act and direction to publish from DCCEW, HB QLD Pty Ltd commenced the public notification process for the Residential Development Project, Bayliss Road South Ripley Queensland (EPBC 2025/10110). No submissions were received over specified period however a single submission was received after the public notification period closed. While the submission was provided outside of the regulatory timeframes, HB QLD Pty Ltd have provided a response to the matters raised by the submitter. Matters raised in the submission can be summarised as:

- Koalas are unlikely to benefit from the offset;
- There is no evidence Grey-headed Flying-fox (GHFF) are likely to use the offset;
- The core indicator and factor weightings are not justified;
- Confidence in predicted outcomes lacks scientific certainty; and
- Offset outcomes are not secured for the duration of the impact.

Comments provided in the submission have been summarised and responded to in this memo.

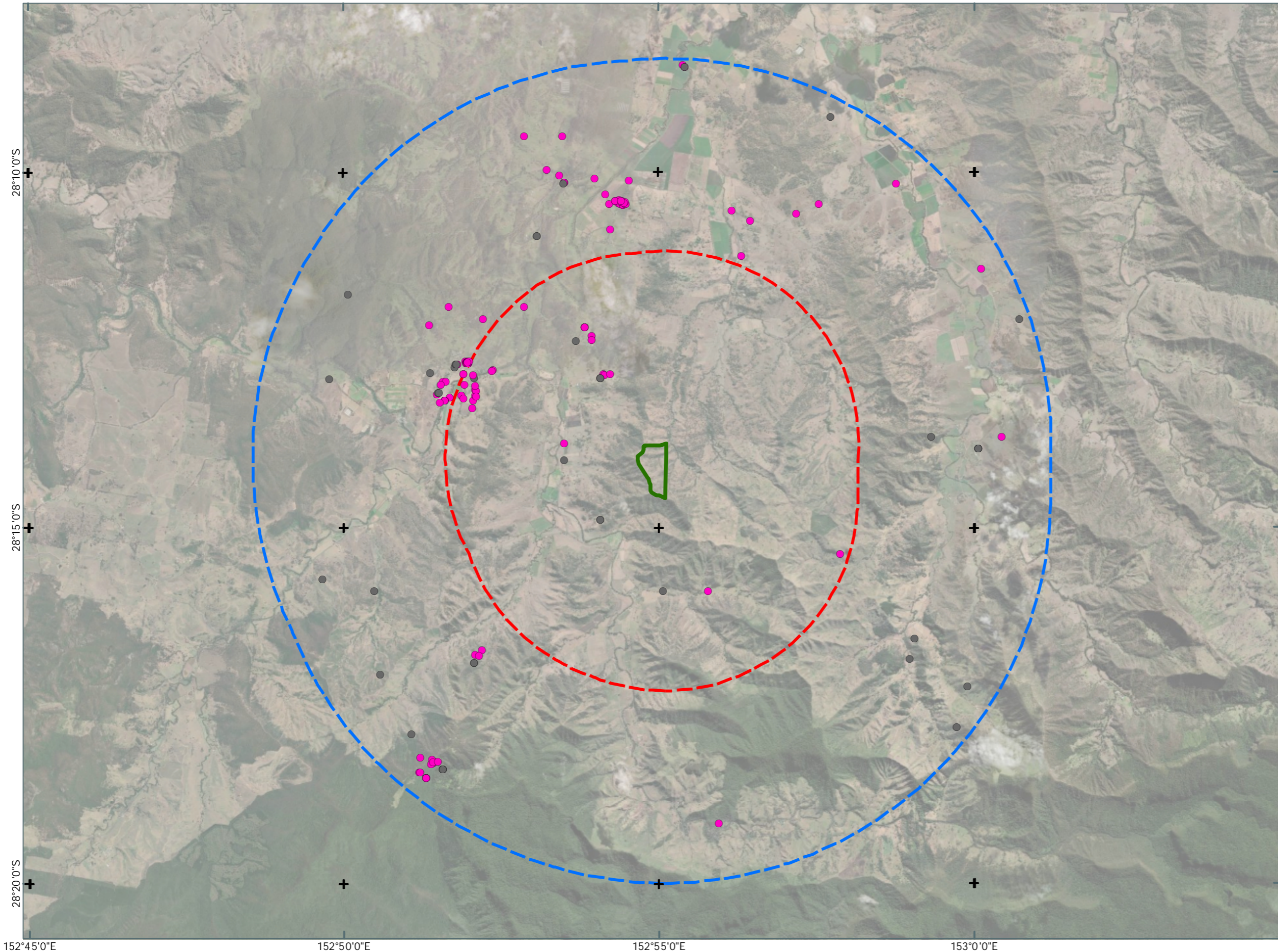


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C1.MOUNT VIEW OFFSET AREA - KOALA RECORDS



Notes:
 This plan was prepared as a desktop assessment tool. The information on this plan is not suitable for any other purpose. Property dimensions, areas, numbers of lots and contours and other physical features shown have been compiled from existing information and may not have been verified by field survey. These may need verification if the development application is approved and development proceeds, and may change when a full survey is undertaken or 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 therefore disclaims any liability for any loss or damage whatsoever or howsoever 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 Saunders Havill. Unless a development approval states otherwise, this is not an approved plan.

Layer Sources
 Source: Esri, Vantor, Earthstar Geographics, and the GIS User Community
 © State of Queensland (Department of Resources) 2026.
 Updated data available at
<http://qids.spatialinformation.qld.gov.au/catalogue/>
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LEGEND

- Old DCDB
 - Mount View Offset Area [71 ha]
 - Offset Area 5km Buffer
 - Offset Area 10km Buffer
- Koala Records (ALA, 2026)**
- Koala records with no date recorded within 10km of offset area [42]
 - Koala records within past 20 years recorded within 10km of offset area [131]

