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7 May 2020

The Minister for Economic Development Queensland
Attention: Manager EDQ Development Assessment
BY EMAIL: pdadevelopmentassessment@dsgmip.qld.gov.au

**Submission on Oxley Priority Development Area
DA: DEV2020/1099 - Stage 1**

The Proposed Development Scheme does not adequately address the following issues:

- Ecology particularly flora, fauna and habitat
- Native trees generally
- Land slippage
- Entrance avenue trees and heritage
- Proposed plant species to be used
- Weed management
- Sustainability
- Future name of the Oxley PDA

Ecology Assessment (Appendix K)

The Ecology report is flawed especially on field assessment of flora and fauna.

Many of the flora species are misidentified which could lead to the unnecessary removal of native plants and the retention of weed plants. Refer to John Lahey's submission for details. *(See end of this submission for a copy.)

On this site, trees provide the basic structure of fauna habitat and retention of this entire habitat as intact is vital to fauna survival.

A thorough and comprehensive bird survey needs to be provided. It needs to be carried out at frequent regular intervals, such as every two weeks, over at least one year, covering both day and night.

Habitat on the PDA is the same as on the neighbouring *Fort Bushland Reserve* and would have the same fauna including bird species. eBird Australia is an excellent citizen science international web site that co-ordinates and records regular bird sightings all over the world. There is a comprehensive list for the *Fort Bushland Reserve* which should be used. It records over 92 bird species, whereas the Ecology Assessment records 27 native bird species and one feral bird species.

A thorough and comprehensive fauna survey, other than on birds, needs to be provided. It needs to be carried out at frequent regular intervals, such as every two weeks, over at least one year, covering both day and night. Fauna information is available from John Lahey and the neighbouring *Fort Bushland Reserve Bushcare Group*.

Submission:

- Redo the Ecology Assessment to be comprehensive and clear
- Redo the plant identifications and have any unknown plants positively identified by the Queensland Herbarium
- Consult eBird Australia for its bird list for the *Fort Bushland Reserve* and the Oxley PDA site
- Redo the fauna survey with any help required to be acquired from suitably qualified sources.

Trees and slippage in the south-west area, below Seventeen Mile Rocks Road

There is a slippage slope on the proposed housing area below the existing houses on Seventeen Mile Rocks Road. Although this has been left out of current BCC mapping, it is shown in earlier mapping. The land there has experienced earlier slippage. This could make it dangerous to build there.

This area in the south-west corner of the site is classified by Brisbane City Council as land of 'High Ecological Significance' recognising the huge Eucalypts there, some of which could be over 200 years old. This ecological classification needs to be respected and adhered to by the proposed development as it contains several huge trees which are very valuable for ecology, amenity and heritage.

A far better solution all round would be to retain BCC's 'High Ecological Significance' classification. The area could be made a low impact public park while respecting the ancient and very large trees. The current development plan is short of useable public green space.

EDQ told the Oxley Community Panel that the project would not respect council's 'High Ecological Significance' classification of the area but would locate big blocks of land there with building envelopes to enable both houses and trees to be accommodated on the sites. However, the development design proposes to remove every single native tree in the residential area. We acknowledge that it is difficult and often dangerous to locate buildings near large trees

Submission:

- Respect and retain Brisbane City Council's 'High Ecological Significance' classification
- Retain trees that provide some stabilisation of the slope
- Locate a low impact public park in the BCC 'High Ecological Significance' area which protects the high value trees and has a few picnic settings and paths
- Help rectify the shortage of public park area in the Proposed Development Scheme.

Trees Generally

The Saunders Havill Group site plan surveyed 1003 trees. The plan proposes to remove 616 native trees and retain fewer than a third (335 native trees), subject to remediation work.

We support the proposal to remove the 52 weed trees.

Save for the trees within the area described as the Endangered Remnant Vegetation Area (“ERVA”, shaded pink) and the area described as the Bushfire Protection Zone, the plan indicates that only seven native trees will be retained.

The scale of the native tree clearance is unnecessary and would adversely affect several aspects of the ecology and amenity of the land, including recreational use, wildlife habitat, soil erosion and slope slippage.

All native trees in the ERVA are marked with a yellow circle, which according to the legend means that “Tree may be previously removed as part of preliminary remediation work” [sic].

It is unclear what this means, however the ambiguity suggests that trees may be damaged or removed. If this occurs, that would be a breach of the law because these trees are protected native vegetation within the Endangered Regional Ecosystem.

Submission:

- Weed species trees may be removed
- Trees in the ERVA must not be removed or damaged
- Trees in neighbouring privately owned land must not be damaged or removed
- At least half of the native trees in the Stage 1 area should be retained, in addition to the trees in the ERVA.

Landscape Masterplan and Concept Plan (Appendix F)

Entrance avenue

The entrance plan for the Oxley PDA proposes to retain some of the built entrance features for heritage reasons but also proposes to remove the existing magnificent avenue of *Flindersia australis* (Crow’s Ash). These trees are very much part of the site’s heritage and provide a ready-made entrance feature.

The proposal shows unnamed trees in a random layout, nowhere near as impressive overall as an entrance and nowhere near as magnificent as the existing avenue.

Include this existing avenue as part of the entrance design.

Submission:

- Retain existing heritage avenue of *Flindersia australis* (Crow’s Ash).

Proposed plant species

Generally in the Oxley PDA proposal, plant species are Australian which is excellent, although not many are local to SE Queensland. However, some proposed plant species are inappropriate.

Tree species

There is an abundance of local tree species that are ideal for use on the site and many have been chosen. However, there are some exceptions.

Choose alternatives for the following:

- *Grevillea baileyana* (White Oak). This comes from North Queensland and is classified as a weed by Brisbane City Council as it establishes itself in Brisbane native bushland areas.
- *Melaleuca leucadendra* (Weeping Paperbark) comes from North Queensland.

Shrub species

Choose alternatives for the following proposed shrub and other plant types:

- *Hymenocallis littoralis* (Spider Lily). Originates in China. There are several Australian lily species that would be suitable.
- *Salvia leucantha* (Sage). Originates in Mexico. Salvias are a very invasive environmental weed in other parts of the Centenary suburbs and could spread very easily into the adjacent bushland areas.
- *Zamia furfuracea* (Cardboard Palm). Originates in Mexico. Australia has an abundance of Zamia species that would be very suitable, several of them local.

Ground cover and waterway species

Use Australian ground cover and waterway species, there are many that would grow in local conditions.

Choose alternatives for the following:

- Gazania species. Originate in South Africa. They are a recognized weed in many parts of Australia and are already established in many parts of Queensland.
- *Juniperous conferta* (Shore Juniper). Originates in Japan. Has a temperate climate character.

Submission:

- Replace non-native and weed plant species with local native plant species.
- Use lists of local plant species compiled by the Brisbane City Council *Fort Bushland Reserve Bushcare Group*.

Weed Management

Provide a comprehensive weed management plan for the site, including for the Conservation Area.

Include in this plan the removal of weeds from the site, including from the bushland area. There are aggressive weeds already in the area which will continue to spread.

Provide very clear and effective weed breaks, such as roads, wide paths or other physical barriers between Stage 1 and the Conservation Area.

Do not have a direct interface between development lots and bushland to avoid exotic plants and weeds escaping into the bushland.

Weed barriers are not shown in the schematic plans, refer to Dwg no.1018015C 08.

The proposed plan shows a 1.5m high aluminium tubular pool fence located between residential lots sharing a boundary with the Conservation Area and with neighbouring private properties. It would have to be mounted on a solid and unbroken masonry plinth at least 500mm high to prevent weeds and exotic plants growing through it into the protected bushland.

Provide a suitable weed barrier between the Retirement Living Precinct and the Conservation Area for the same protection reasons.

Submission:

- Provide a comprehensive weed management plan for the site, including for the Conservation Area
- Remove weeds from the site, including from the bushland area
- Provide a solid and unbroken masonry plinth at least 500mm high between the Conservation Area and all development lots to prevent weeds and exotic plants growing into the protected bushland.

Sustainability

Include sustainability in the Proposed Development Scheme, it is an important part of any development and covers sustainable management of water, soil, ecology, fauna, air quality, energy etc.

Submission:

- Provide a comprehensive Sustainability Plan for the site, including for the Conservation Area.

Future Name

Oxley Parkside is not really an appropriate name and could be more interesting.

Submission:

- Hold a naming competition so the community can make some interesting suggestions and feel more involved.



Shealagh Walker

President, on behalf of Centenary and District Environment Action Inc.

* From John Lahey's submission:

While there has been some excellent work done by Saunders Havill Group in mapping the larger trees on the site, many parts of their report are a complete shambles, and in my opinion quite unprofessional. Specifically

- The Native flora species list contains only 42 species. The site would contain at least 200 native species. (The nearby Fort Bushland Reserve has over 300 native species). This is not of itself a major problem because many of those missing species would only be found in the bushland conservation area. All of the indigenous native plants in this area will be protected.
- What is more disturbing is that the Introduced species list includes six indigenous native species. These are *Centella asiatica*, *Commelina diffusa*, *Hydrocotyle tripartita*, *Oplismenus aemulus*, *Solanum stelligerum* and *Tabernaemontana pandacaqui*. All of these species occur here naturally and it is very dangerous to include them in an introduced species list as this could lead to their removal and destruction. This error must be corrected.

- A large number of the 1003 listed trees have been incorrectly identified. There are 29 *Flindersia schottiana* trees on the list. Not one of these trees is *Flindersia schottiana*. Even though this species is very common in the Fort Bushland Reserve I haven't observed one tree on this site. Most of the trees are actually *Flindersia australis* (Crow's Ash). At least one of them is *Flindersia xanthoxyla* (Yellow-wood).
 - Trees 97, 150, 164, 168, 174 and 184 are listed as *Pittosporum*(sic) *undulatum*. I hunted around the area where these trees are shown to be growing but could find nothing resembling *Pittosporum undulatum*. Since this species does not occur naturally in this area I would have thought this might have raised a red flag with the survey team. One tree that I did find in the area that is not on the list is the glabrous form of *Alstonia constricta*. It has large glossy leaves with wavy margins. Note that the hairy form of *Alstonia constricta* is found elsewhere on the site but it too is not recorded. Needless to say trees 97, 150, 164, 168, 174 and 184 need to be checked to ensure that they are correctly identified. *Pittosporum undulatum* if it exists would be treated as a weed in this bushland.
 - I couldn't find tree 163 *Grevillea baileyana* and I suspect that it has been identified incorrectly. This needs to be checked before it is removed because it might be an indigenous native species that has been incorrectly identified.
 - Trees 306, 307, 310, 330 and 568 are listed as *Cryptocarya gaucescens*. It is assumed that this is a misprint for *Cryptocarya glaucescens*.
 - I was astounded to discover that the list of introduced species does not include *Dyschoriste depressa*. Apart from a few grasses, this weed is the most prevalent introduced plant on the site and probably numbers in the tens of thousands if not hundreds of thousands. Section 5.2.2 Weeds suggests that no special action is needed during the construction phase to limit the spread of weeds or to protect the bushland areas. *Dyschoriste depressa* is a highly invasive weed that spreads rapidly. The Brisbane City Council website states
Dyschoriste (Dyschoriste depressa) reproduces by seed and also vegetatively, via stem fragments that can take root in damp environments. This species spreads laterally and individual plants can cover relatively large areas. Stem fragments are cut and spread to new areas by mowers and slashers, and can also be spread down waterways during floods. Seeds are dispersed small distances when they are explosively released. They can also be spread larger distances on contaminated machinery, in dumped garden waste or lawn clippings, or in mud that becomes stuck to animals, shoes and vehicles.
- Therefore during the construction phase special action will be needed to prevent the spread of this weed with particular action being taken to ensure that it does not spread into the protected bushland preservation and conservation areas.