

Abadi Gaia Adult Residential Village

Application Number: **02688**

Commencement Date:
14/11/2024

Status: **Locked**

1. About the project

1.1 Project details

1.1.1 Project title *

Abadi Gaia Adult Residential Village

1.1.2 Project industry type *

Residential Development

1.1.3 Project industry sub-type

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1.1.4 Estimated start date *

01/03/2025

1.1.4 Estimated end date *

01/03/2035

1.2 Proposed Action details

1.2.1 Provide an overview of the proposed action, including all proposed activities. *

The action consists of the development of a master planned Retirement Community/Disability Accommodation and Aged Care Facility and the retention and rehabilitation of a conservation area. The Abadi Gaia Adult Residential Village will cater for the active ageing retiree, seniors and elderly in accordance with the internationally recognized best practice “contemporary continuum of care” model.

The site is 11.43 ha in area and the proposed Abadi Gaia Adult Residential Village will be limited to a clearing footprint of 5.22 ha with the remainder totaling 5.61 ha retained in the conservation area which will retain significant corridor functions and will be actively managed to improve the biodiversity values of this area.

The sites vegetation is a highly disturbed Open Forest to Woodland community dominated by *Eucalyptus mollucana* and *Corymbia citriodora* with *E. crebra*, *Angophora leiocarpa*, *E. major* and *E. siderophloia*. *E. tereticornis* and *Lophostemon suaveolens* are also represented in gullies. This community is analogous with Least Concern Remnant Regional Ecosystem 12.9-10-2. Much of the site is has been subject to historic clearing prior to 1980 and is largely young-mature vegetation and continuing disturbance including firewood collection, 4wd tracks, illegal dumping and significant areas of the site support infestations of the weeds *Lantana montevidensis* and *Megathyrsus maximus*.

The Abadi Gaia Adult Residential Village will deliver important community benefits to cater to the significant projected increase in the ageing population in the Ipswich City Council area, in a manner that addresses the future direction of ageing policy and the changing expectations of the community around how they are able to age well in their local communities. By providing dwelling variation requirements, a wide range of age-appropriate services, recreational activities, medical and specialist support services including dementia and mobility impaired residents, the project will positively contribute to the addressing of an under-serviced and growing need to the community and Government in accordance with the community of the care continuum model. Further information on the need for the project is contained in Att_1_ Community Needs Assessment (Pgs 3-33).

The development will comprise of:

- 189 Independent Living Units (ILUs) Retirement Village,
- 81 high care suites including a 27-bed dementia ward and 54 bed aged care ward, and
- 15 Independent Living apartments in a Special Disability Accommodation building [MS ward].

The development will be constructed progressively in seven (7) building stages over a six-to-ten-year period, respective site clearing activities will occur in two (2) stages with Stage One, an area of 3ha (26% of the site), commencing in 2025 and the second clearing area of 2.1ha (18.6% of the site) proposed to occur in 2027.

The proposed Abadi Gaia Adult Residential Village has been informed by significant technical investigations and has been designed to minimize potential impacts on ecological values and avoid conflicts through design approaches consistent with best practice guidelines including but not limited to the Koala Sensitive Design Guideline (DES 2022).

A development approval for the project has been issued by Ipswich City Council June 2023 for Material Change of Use (11756/2021/MCU) and the Qld state government - State Assessment and Referral Agency (SARA) (SARA- 2107-23765 SRA) in accordance with Queensland planning regulation Schedule 10, part 10, division 3, subdivision 3, table 1, item 1 (Planning Regulation 2017) "*Development application for a material change of use involving interfering with koala habitat within a koala habitat area*".

The development approval has been granted subject to Enviromental management plans and restrictions which were submitted with the development application and are approved by SARA, including the;

- Clearing Extents Plan,
- Construction environmental management plan,
- Operational environmental management plan,
- Koala Management Plan,
- Rehabilitation Management Plan

In addition to onsite rehabilitation and koala friendly landscaping, the project will establish an environmental offset which replaces all Non-Juvenile Koala Habitat Trees removed, at a rate of 3 trees planted at an offset site for every 1 tree removed.

For further information on the proposed action, current approvals and potential impacts and management measures, refer to;

- Att_2_State Assessment and Referral Agency Response,
- Att_3_State Assessment and Referral Agency Approved Plans
- Att_4_Ipswich City Council Decision Notice
- Att_5_Ecological Assessment Report Part 1,
- Att_6_Ecological Assessment Report Part 2, and
- Att_7_Abadi Gaia Operational Management Plan.

1.2.2 Is the project action part of a staged development or related to other actions or proposals in the region?

No

1.2.6 What Commonwealth or state legislation, planning frameworks or policy documents are relevant to the proposed action, and how are they relevant? *

The Abadi Gaia Adult Residential Village has been approved pursuant to a Material Change of Use pursuant to State and Local legislation, by the relevant administering authority. The relevant legislative and policies include:

Commonwealth Legislation and Policies

- Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)
- EPBC Act Environmental Offsets Policy 2012

State Legislation, Frameworks and Policies

- Planning Act 2016 / Planning Regulation 2017
- State Development Assessment Provisions (SDAP), State Code 6: Protection of State Transport Networks
- State Development Assessment Provisions (SDAP), State Code 16: Native Vegetation Clearing
- State Development Assessment Provisions (SDAP), State Code 25: Development in South-East Queensland Koala Habitat Areas
- Southeast Queensland Regional Plan 2017
- Nature Conservation Act 1992 (NC Act)
- Vegetation Management Act 1999 (VM Act)
- Biosecurity Act 2014 (and Regulation)
- Environmental Offsets Framework (Environmental Offsets Act 2014 and Regulation, Environmental Offsets Policy Version 1.12)
- Fisheries Act 1994 (Fisheries Act)
- Water Act 2000 (Water Act)

Local Legislation

- Ipswich Council Planning Scheme 2017

1.2.7 Describe any public consultation that has been, is being or will be undertaken regarding the project area, including with Indigenous stakeholders. Attach any completed consultation documentations, if relevant. *

Prior to the lodgement of the development application community consultation was undertaken including both formal and informal approaches including social media. PGS Invest actively sought to engage local community groups, particularly the highly active Bellbird Park Preservation Group, unfortunately we were declined on all 3 attempts for a meeting.

Using an independent third provider, in 2021 PGS Invest also ran a blind Facebook survey to identify the communities preference for land use.

The survey was restricted to a radius of 10 km from Goodna to ensure it reflected local resident views, and reached 50,013 users, 1,064 engagements and received 143 responses. Participants were voluntary and provided a choice of subdivision, acreage property or retirement village.

The results were

- Retirement village (46.85%)
- Acreage lots (35.66%)
- Residential housing (17.48%)

During the development assessment process, public notification of the application was undertaken for a period of 15 business days pursuant to the Planning Act 2016, from 18 May 2022 to 9 June 2022. Council received 15 properly made submissions which area summarized in Att 2 - (2023-08-04) 11756/2021/MCU Development Assessment Report Approval Impact.

Prior to this EPBC referral of the action, an additional community consultation event was undertaken. The event was publicised via letterbox drop with over 3890 letters delivered in the Goodna area and an additional 3406 letters distributed in the neighboring Bellbird Park area. The Event was held on the 4th December 2024 with only a small attendance by the public and was well received. Details of the Community Consultation undertaken to date are contained in Att_8_Public Consultation Documentation (pgs 1-10)

1.3.1 Identity: Referring party

Privacy Notice:

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By completing and submitting this form, you consent to the collection of all personal information contained in this form. If you are providing the personal information of other individuals in this form, please ensure you have their consent before doing so.

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some or all of the personal information requested on this platform (name and email address), the department will be unable to contact you to seek further information (if required) and subsequently may impact the consideration given to your submission.

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Confirm that you have read and understand this Privacy Notice *

1.3.1.1 Is Referring party an organisation or business? *

Yes

Referring party organisation details	
ABN/ACN	31146671481
Organisation name	NEW GROUND ENVIRONMENTAL PTY LTD
Organisation address	Po Box 713 Mermaid Beach 4218 QLD
Referring party details	
Name	Brett Campbell
Job title	Principal Environmental Scientist
Phone	0467703868
Email	bcampbell@newground.com.au
Address	Gold Coast 6A & 6B 2563 Gold Coast Highway, Mermaid Beach QLD 4218

1.3.2 Identity: Person proposing to take the action

1.3.2.1 Are the Person proposing to take the action details the same as the Referring party details? *

No

1.3.2.2 Is Person proposing to take the action an organisation or business? *

Yes

Person proposing to take the action organisation details	
ABN/ACN	58155821346
Organisation name	PGS INVEST PTY LTD
Organisation address	4217 QLD
Person proposing to take the action details	
Name	Adam Slijderink
Job title	Chief Executive Officer
Phone	0404000403
Email	adam@cli.net.au
Address	8 Glenwater Crescent Helensvale, QUEENSLAND, 4212

1.3.2.14 Are you proposing the action as part of a Joint Venture? *

No

1.3.2.15 Are you proposing the action as part of a Trust? *

No

1.3.2.17 Describe the Person proposing the action's history of responsible environmental management including details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the Person proposing to take the action. *

<p>PGS Invest Pty Ltd is a small family run business.</p> <ul style="list-style-type: none">• <i>Adam Slijderink</i> - CEO
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- *Paul Slijderink* - Director-Builder
- *Chanel Slijderink* - Development manager- medical and finance

PGS Invest Pty Ltd does not have any past or present proceedings against the company under a Commonwealth, State or Territory law for the protection of the environment or, the conservation and sustainable use of natural resources. PGS Invest Pty Ltd has not previously referred under the EPBC Act or been responsible for undertaking any action referred under the Act.

Adam Slijderink as the CEO will be responsible for the action including all environmental measures and compliance with approvals. Adam has completed studies in environmental science -Ecology, Pollution and Health in the early 90's and was employed as environmental scientist/engineer with various firms for 12 years, specialising in sustainable development.

During this time, he consulted to various NGO's- Australian Conservation Fund and Greenpeace, industry and government agencies. Notable achievements include, but are not limited to:

- Steering Committee Member- Australian Sustainable Development Guidelines - Federal Department of Science, Tourism and Technology 1996-97,
- Author Fiji's sustainable development guidelines 1998 (Mamanuca islands),
- Keynote speaker at three international conferences on Ecological Sustainable Development, and
- Executive team member [environment] for Couran Cove Resort which won 28 international and national awards including the covenanted international 1998 Banksia Gold Award for "Best Sustainable Development".

The team's last project (in Ipswich) was awarded Finalist UDIA Qld awards for Best Small Sustainable Subdivision 2009 & 2010. Notably a key feature was the dedication of a koala reserve 6.64 ha or 60% of the site.

In 2013 PGS Invest purchased the subject lands with a subdivision approval. The previous approval would have resulted in the extensive clearing of the site. The development approval did not accord with the PGS Invest environmental principles and so a more sustainable outcome was pursued, consequently the proponent ceased all understorey land clearing practices and advanced the currently approved development. The development team and CEO are genuinely committed to sustainable development, a key focus of the Abadi Gaia Adult Residential Village.

1.3.2.18 If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework

PGS Invest Pty Ltd is not a corporation.

1.3.3 Identity: Proposed designated proponent

1.3.3.1 Are the Proposed designated proponent details the same as the Person proposing to take the action? *

Yes

Proposed designated proponent organisation details	
ABN/ACN	58155821346
Organisation name	PGS INVEST PTY LTD
Organisation address	4217 QLD
Proposed designated proponent details	
Name	Adam Slijderink
Job title	Chief Executive Officer
Phone	0404000403
Email	adam@cli.net.au
Address	8 Glenwater Crescent Helensvale, QUEENSLAND, 4212

1.3.4 Identity: Summary of allocation

Confirmed Referring party's identity

The Referring party is the person preparing the information in this referral.

ABN/ACN	31146671481
Organisation name	NEW GROUND ENVIRONMENTAL PTY LTD
Organisation address	Po Box 713 Mermaid Beach 4218 QLD

Representative's name	Brett Campbell
Representative's job title	Principal Environmental Scientist
Phone	0467703868
Email	bcampbell@newground.com.au
Address	Gold Coast 6A & 6B 2563 Gold Coast Highway, Mermaid Beach QLD 4218

Confirmed Person proposing to take the action's identity

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

ABN/ACN	58155821346
Organisation name	PGS INVEST PTY LTD
Organisation address	4217 QLD
Representative's name	Adam Slijderink
Representative's job title	Chief Executive Officer
Phone	0404000403
Email	adam@cli.net.au
Address	8 Glenwater Crescent Helensvale, QUEENSLAND, 4212

Confirmed Proposed designated proponent's identity

The Person proposing to take the action is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

1.4 Payment details: Payment exemption and fee waiver

1.4.1 Do you qualify for an exemption from fees under EPBC Regulation 5.23 (1) (a)?

Yes

1.4.2 Select reason for exemption

Small Business

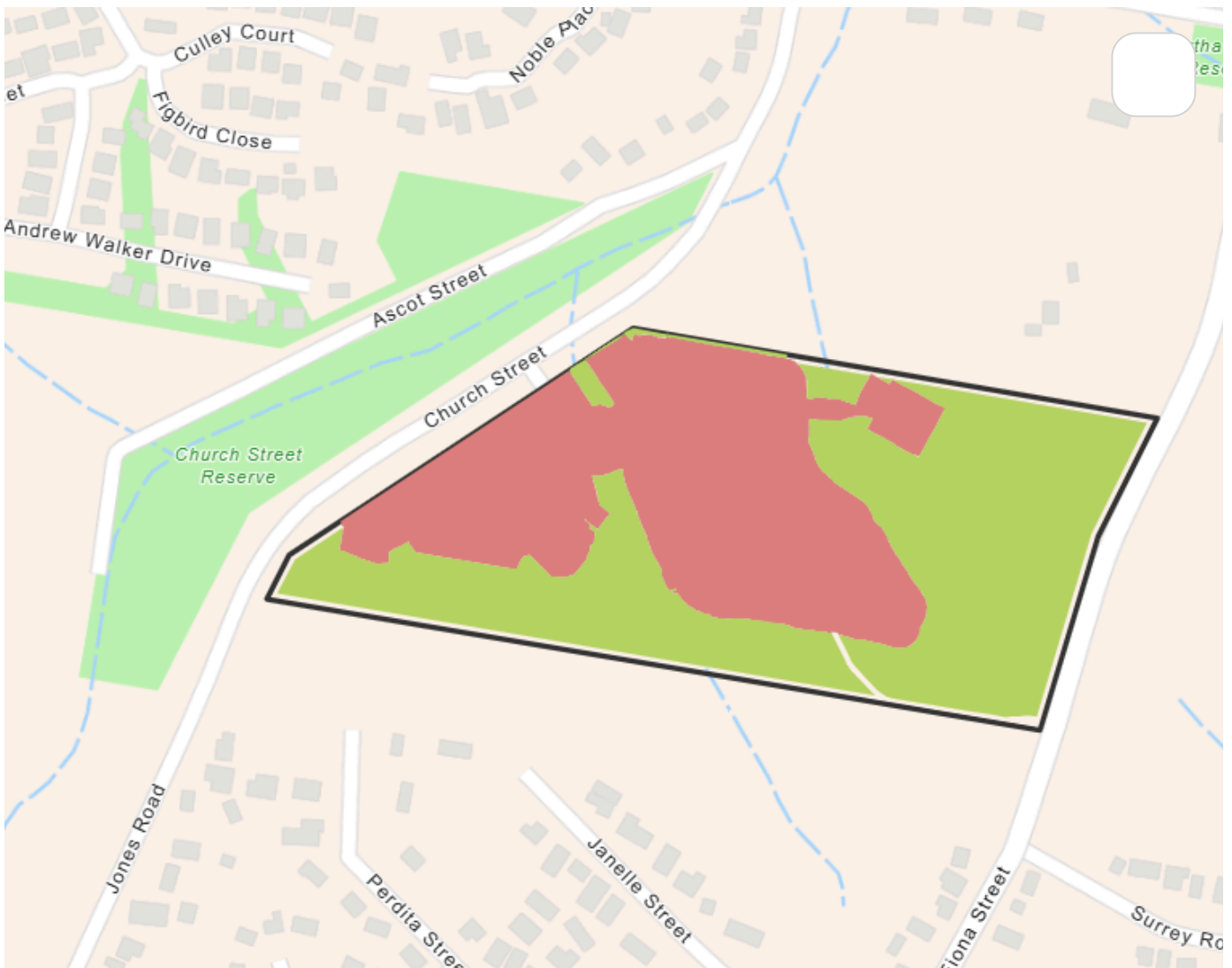
1.4 Payment details: Payment allocation

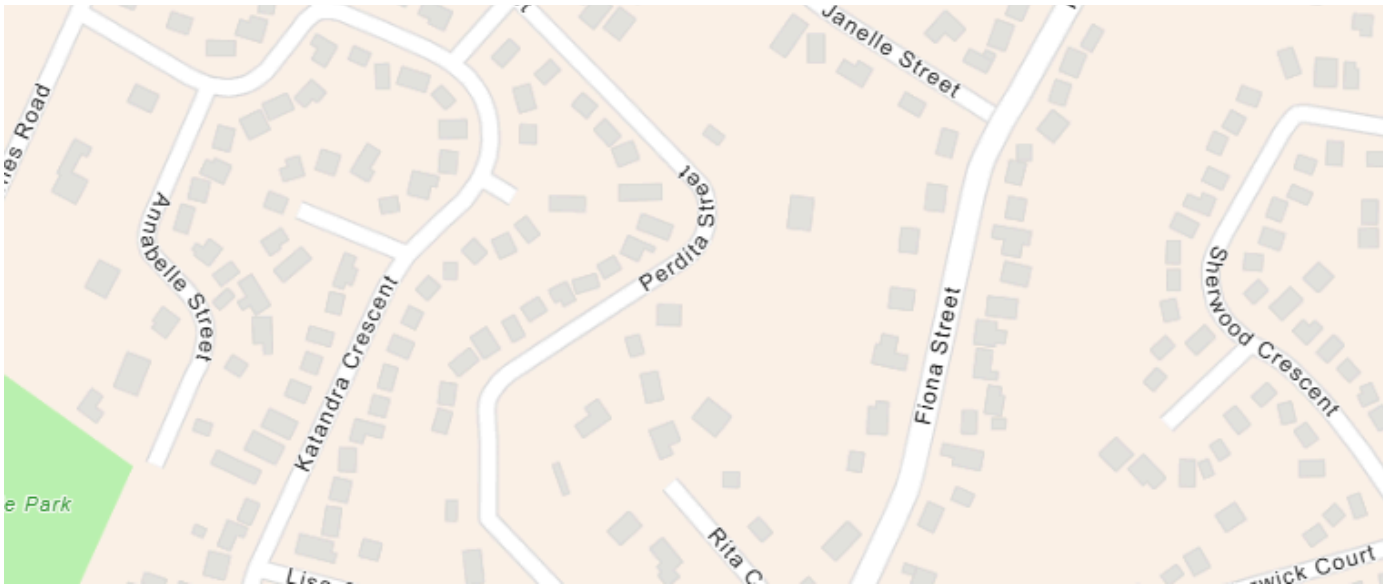
1.4.11 Who would you like to allocate as the entity responsible for payment?

Proposed designated proponent

2. Location

2.1 Project footprint





Project area (11.46 Ha)
Disturbance footprint (5.23 Ha)
Retention area (5.62 Ha)

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Powered By Esri - Sources: Esri, TomTom, Garmin, F...

2.2 Footprint details

2.2.1 What is the address of the proposed action? *

107 Bertha Street, Goodna, Queensland

2.2.2 Where is the primary jurisdiction of the proposed action? *

Queensland

2.2.3 Is there a secondary jurisdiction for this proposed action? *

No

2.2.5 What is the tenure of the action area relevant to the project area? *

Freehold

3. Existing environment

3.1 Physical description

3.1.1 Describe the current condition of the project area's environment.

The proposed development site was largely cleared prior to 1980 for grazing and/or forestry purposes, leaving only scattered overstorey trees (as shown in the Brisbane west ortho photo dated 3 July 1980). The site has been regenerating naturally since this time and now supports a community that contains young-mature tree species with occasional mature and senescing trees.

The site is subject to significant ongoing disturbances and as it is unfenced and easily accessible and is used by unauthorized persons for recreational 4wds and motorcycles (dirt bikes) and there is recent evidence of felling of trees of trees for firewood and is often used for illegal waste dumping.

The site is heavily impacted by weeds with Guinea Grass (*Megathyrsus maximus*) and Trailing lantana (*Lantana montevidensis*) being the most widespread and prolific species however other significant weed species such as Asparagus Fern (*Asparagus aethiopicus*), Rhodes Grass (*Chloris gayana*), Morning Glory (*Ipomoea purpurea*), Lantana (*Lantana camara*), Ochna (*Ochna serrulata*) occur within the site at varying densities.

As the site is used by the public for recreational 4wd and dirt bikes there are numerous tracks across the site which are eroded and new tracks are formed in vegetated areas regularly. These tracks provide opportunities for edge effects such as additional weed intrusion and feral predatory ingress into native vegetation areas.

The ecological surveys determined that while the vegetation is regenerating as an Open Forest and provides important ecological functions such as corridor connectivity and habitat for the Koala, the previous and ongoing disturbance pressures, especially weed infestation, in the absence of active management, will continue to hinder the natural regeneration and further compromise the biodiversity values of the site.

Further information can be found in the Ecological Assessment Report Att_5_Ecological Assessment Report, Chapter 4, pgs 17-28.

3.1.2 Describe any existing or proposed uses for the project area.

The project area is not actively used for any industrial, economic or social uses that are authorized however, illegal use of the site for 4wds, dumping or refuse, camping and off leash dog walking is occurring and will be halted once construction begins.

The major land uses surrounding the project area are residential uses, however small lot agricultural pursuits do occur in rural residential lots to the north. The site is also bounded by a high voltage transmission line to the south. To the east, Ric Natrass Environmental Park provides opportunities for formalized nature-based recreation including bushwalking/hiking along built and formalized tracks and nature appreciation activities such as bird watching and Koala spotting.

As detailed in the design considerations, the Abadi Gaia Adult Residential Village will provide a much-needed range of seniors and aged care accommodation and health care opportunities to support the aging population of the Ipswich area. The Master planned development has incorporated recreational facilities that will be utilized by both the residents and their visitors. While the primary function of the conservation area will be providing biodiversity outcomes, this area is expected to be used by residents and visitors alike for low impact nature-based appreciation activities such as bushwalking and birdwatching.

3.1.3 Describe any outstanding natural features and/or any other important or unique values that applies to the project area.

The vegetation of the project area does not contain significant or outstanding natural features due to previous and ongoing disturbance impacts. There are not particularly significant outcrops of rock, or caves and the sites drainage channels are heavily impacted by weed infestation and contain no pools.

The sites' ecological community does provide an important function for ecological connectivity and feed trees for the Koala, providing a corridor between Ric Natrass Environmental Park in the east and Church Street Reserve in the east and, other smaller peri urban remnants however these corridors are bisected by Church and Bertha Streets.

This corridor value has been a focus in the design of the project to ensure its ecological function is maintained and that threatening processes such as weed invasion and feral animal predation is reduced over time and that the habitat values can improve over time with active management.

3.1.4 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

Elevation within the project area ranges from around 20m AHD in the northwest corner of the project area to approximately 65m in the southern eastern corner of the project area. The topography is best described as low to medium undulating hills in the project site, bisected by two drainage channels that drain from the areas of highest elevation (50-65 m) along the southern boundary of the site to the lowest area at the northwest boundary of the project area.

3.2 Flora and fauna

3.2.1 Describe the flora and fauna within the affected area and attach any investigations of surveys if applicable.

Ecological field investigations were undertaken by senior ecologists over a number of periods between October 2020 and September 2021, with subsequent surveys conducted during September and October 2024 designed to identify the Vegetation communities within the study area, undertake habitat assessments for Threatened species and to target Threatened and Significant Flora and Fauna species. The September/October 2024 surveys were designed specifically to target species listed pursuant to the EPBC Act after 2021 (such as flora and bird species) and, to determine any changes in the vegetation, habitats or, Koala utilisation of the site.

The surveys included;

- vegetation community surveys,
- habitat assessments,
- breeding places,
- targeted threatened flora surveys;
- diurnal and nocturnal herpetofauna surveys,
- spotlighting and call playbacks,
- diurnal bird surveys and
- comprehensive Koala surveys including KSATS and Koala tree counts.

The site was found to support an Open Forest Community (PFC 30-70%, 18-22m high) generally dominated by *Eucalyptus mollucana* and *Corymbia citriodora* with *E. crebra*, *Angophora leiocarpa*, *E. major* and *E. siderophloia*. *E. tereticornis* and *Lophostemon suaveolens* are also represented in gullies which exhibited floristics, canopy height and canopy cover resemble Least Concern Remnant Regional Ecosystem 12.9-10-2 as described by the Queensland Herbarium Technical Description for this RE (DSITIA, 2012).

A total of 59 species of flora were recorded during the survey. Of these, 40 species are listed as Least Concern flora and one (1) species (*Xanthorrhoea johnsonii*) is a Special Least Concern species under the NC Act. Sixteen of the recorded flora species are exotic species and/or environmental weeds. Of the exotic species recorded, three (3) are category 3 restricted matters under the Biosecurity Act 2014 and listed by the Federal Government as Weeds of National Significance (WoNS). In addition, 49 fauna species were detected on site comprising of; 33 avifauna and five (5) mammal species, nine (9) amphibian species and two (2) reptile species. Of these records, two (2) of the recorded species are exotic and the Koala, listed as Endangered pursuant to both the EPBC act and NC Act.

The Koala (*Phascolarctos cinereus*) was identified during the surveys through the detection of both scats and scratches during the formal KSAT surveys undertaken in November 2020, the KRAM searches undertaken during the Koala Habitat Values Plots undertaken in August 2021 and subsequent KSAT surveys undertaken in September 2024.

During the KSAT surveys conducted in 2020, differing aged of scats (based on visual interpretation of decomposition) and previous longer-term evidence of scratches were identified within the site which, anecdotally indicated that the site had been used occasionally separated by long periods i.e. 6 -12months, however the number of scats and density of scratches was low with only small numbers of scats detected. The activity levels based on the KSATs were determined to be low in accordance with Phillips and Callaghan (2011) ranging from 3.3% (a single tree with scats from 30 trees) to 13.3% (4 trees with scats).

The additional KSAT surveys conducted in September 2024 obtained similar results to the previous surveys of 2020 recording differing aged scats (indicating usage on at least two occasions since previous surveys). Similar to the 2020 results, the number of scats at each tree was generally low and activities levels across the site varied, however were generally low for most KSATs, but ranged from zero activity to one plot with medium usage occurring in the conservation area.

Detailed assessments of EPBC species likelihood of occurrence were also undertaken, informed by the Field investigations, desktop reviews of relevant databases, scientific literature and other studies undertaken in the region including but not limited to, PMST and wildlife online searches for species that have previously been recorded or predicted to occur within a 10 km buffer of the Study Area.

Only two species, the Koala (*Phascolarctos cinereus*) and Grey-headed Flying fox (*Pteropus poliocephalus*) were considered as Subject Species that could be potentially impacted by the proposed activity and as such required detailed assessment against the relevant criteria in the Matters of National Environmental Significance - Significant Impact Guidelines 1.1

The Flora and Fauna investigations and Assessment of Impacts are contained in Att_5_Ecological Assessment Report Part 1- Sections 2 -7 (pgs 9 -73) and supported by Database searches and mapping in the Appendices A-J contained in Att_6_Ecological Assessment Report Part 2

3.2.2 Describe the vegetation (including the status of native vegetation and soil) within the project area.

The project area is located upon sedimentary substrate identified as the Raceview Formations (Rbwc) which covers that majority of the land. The Raceview formation was formed in the late Triassic containing sublabile to quartzose sandstone, shale, mudstones, thin coal seams and siltstone with the dominant rock type of Arenite-Mudrock. The soils are described in the Atlas of Australian Soils as hard pedal mottled-yellow duplex soils with a duplex yellow-grey hard setting A horizon, a conspicuous bleached A2 horizon and an acid-pedal mottled B horizon.

The project area supports both remnant and non-remnant vegetation pursuant to the Vegetation Management Act. The majority of the site supports naturally regeneration vegetation following extensive clearing prior to 1980, which is analogous to Least Concern Remnant Regional Ecosystem 12.9-10-2 - *Corymbia citriodora subsp. variegata* +/- *Eucalyptus crebra* open forest on sedimentary rocks.

The Open Forest community is described as having a PFC of 30-70%, 18-22m high, generally dominated by *Eucalyptus mollucana* and *Corymbia citriodora* with *E. crebra*, *Angophora leiocarpa*, *E. major* and *E. siderophloia*. *E. tereticornis* and *Lophostemon suaveolens* are also represented in gullies. The Shrub layer (PFC, 10-30%, 2- 5m high) is dominated by *Acacia spp.*, and *Alphitonia excelsa* with *Allocasuarina littoralis* and *L. suaveolens*. The ground layer has a 10-30% cover, <1m high of *Ochna serrulata**, *Lantana montevidensis**, *Megathyrsus maximus**, *Lantana camara**, *Themeda australis*, *Entolasia stricta*, *Cymbopogon refractus*, *Paspalum sp.* and *Lepidosperma laterale*. *Xanthorrhoea johnsonii* is represented at the site's east.

The Non-remnant Mosaic is largely a derived grassland (along site's eastern boundary) (including *M. maximus**, *Melinis repens**, *Setaria sphacelata**, *Paspalum sp.*, *Imperata cylindrica*). Some patches of regenerating open forest resembling the floristics of the Open Forest community (RE12.9-10.2) occurs at the site's southern boundary. Att_5_Ecological Assessment Report Part 1- Section 4 (pgs 17 -28) provides details on the vegetation of the site and is mapped in the Appendix F contained in Att_6_Ecological Assessment Report Part 2

3.3 Heritage

3.3.1 Describe any Commonwealth heritage places overseas or other places recognised as having heritage values that apply to the project area.

The proposed development is not associated with a Commonwealth Heritage places overseas or other recognised places. In addition, the site is not associated with, nor does it adjoin a property on the Queensland heritage register.

3.3.2 Describe any Indigenous heritage values that apply to the project area.

The Traditional Owners of the broader Ipswich region are the Clans that identify as being a part of the Yagara/Yugara Language Group (the Jagera, Yuggera and Ugarapul People). The project area is located within Goodna which is Ugarapul traditional Aboriginal country. The Ugarapul people, are custodians within the traditional Ugarapul country, spoke a dialect of the Ugarapul language group.

While no indigenous values have been identified on site, no site species investigations have been undertaken however, prior to clearing a cultural heritage expert will be engaged to observe clearing and grubbing works to identify and collect any potential artifacts that may be unearthed.

PGS Invest Pty Ltd are also working with the Yugambah Land Enterprise first nation owners in regard to ensuring appropriate offset rehabilitation works result. Yugambah Land Enterprise ensures seeds are grown in a nursery and lands appropriately rehabilitated and managed in perpetuity by first nation traditional landowners.

3.4 Hydrology

3.4.1 Describe the hydrology characteristics that apply to the project area and attach any hydrological investigations or surveys if applicable. *

The Site contains two ephemeral drainage channels that traverse through the site, generally in an east-west direction which discharge separately to the northwest boundary entering the Church Street Road reserve and northern boundary entering the neighboring property, respectively.

A Site Based Stormwater Management Plan (SBSMP) was prepared by Cozens Regans Group which examines and evaluates options for Stormwater Management during the construction and operational phase for the Abadi Gaia Retirement Village. The objectives of the study were to;

- a) To ensure that the water quality of the receiving waters is not worsened by the site development.
- b) Minimise sediment transport in surface water runoff during the construction and operational stages.
- c) Provide a monitoring and maintenance programme for implementation during the construction phase.

The report included modeling of both flow and quality in accordance with the Queensland Urban Drainage Manual 2013 and Ipswich City Council requirements using the Municipal Urban Stormwater Improvement Conceptualisation program (MUSIC) and assessed the stormwater impacts with reference to the planned use of rainwater tanks, filter baskets and bioretention basins.

The SBSMP determined that Water Sensitive Urban Design objectives are met by implementing Erosion and Sediment Control and through provision of a stormwater treatment train. As such the development, meets the stormwater quality treatment targets in accordance with Council's requirements.

The stormwater objectives, stormwater quality management measures and assessments are contained in Sections 2-4 (pgs 8-20) of the Site Based Stormwater Management Plan (SBSMP) which is attached - Att_7 Stormwater Management Plan Part A. Supporting Information is contained in Att_8 Stormwater Management Plan Part B, Appendices A-E.

4. Impacts and mitigation

4.1 Impact details

Potential Matters of National Environmental Significance (MNES) relevant to your proposed action area.

EPBC Act section	Controlling provision	Impacted	Reviewed
S12	World Heritage	No	Yes
S15B	National Heritage	No	Yes
S16	Ramsar Wetland	No	Yes
S18	Threatened Species and Ecological Communities	Yes	Yes
S20	Migratory Species	No	Yes

EPBC Act section	Controlling provision	Impacted	Reviewed
S21	Nuclear	No	Yes
S23	Commonwealth Marine Area	No	Yes
S24B	Great Barrier Reef	No	Yes
S24D	Water resource in relation to large coal mining development or coal seam gas	No	Yes
S26	Commonwealth Land	No	Yes
S27B	Commonwealth Heritage Places Overseas	No	Yes
S28	Commonwealth or Commonwealth Agency	No	Yes

4.1.1 World Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.1.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.1.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

There are no World Heritage Areas within or adjacent to the site therefore will not have direct or indirect impacts on any World heritage area.

4.1.2 National Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.2.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.2.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

There are no National Heritage places within the Project Area or within proximity to the site that would be directly impacted by the action and as water quality controls will be implemented that meet state guidelines no National Heritage places that occur downstream will be impacted.

4.1.3 Ramsar Wetland

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	Ramsar wetland
No	No	Moreton Bay

4.1.3.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.3.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The Morton Bat Ramsar area is approximately 30 km east of site and will not be directly impacted by the proposed development. Indirect impacts through runoff of sediment and nutrients into the Brisbane River will be avoided through on-site management of stormwaters through the use of sediment and erosion control devices during construction and once operational through the use of rainwater tanks, vegetated drainage lines and installation of bioretention basins. The stormwater quality measures have been modelled, and the resulting runoff meets or exceeds Councils stormwater quality treatment targets. As such the action is highly unlikely to have a direct and/or indirect impact on the Morton Bay Ramsar Wetland.

4.1.4 Threatened Species and Ecological Communities

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Threatened species

Direct impact	Indirect impact	Species	Common name
No	No	<i>Anthochaera phrygia</i>	Regent Honeyeater
No	No	<i>Argynnis hyperbius inconstans</i>	Australian Fritillary
No	No	<i>Arthraxon hispidus</i>	Hairy-joint Grass
No	No	<i>Botaurus poiciloptilus</i>	Australasian Bittern
No	No	<i>Calidris acuminata</i>	Sharp-tailed Sandpiper
No	No	<i>Calidris ferruginea</i>	Curlew Sandpiper
No	No	<i>Calyptorhynchus lathami lathami</i>	South-eastern Glossy Black-Cockatoo
No	No	<i>Chalinolobus dwyeri</i>	Large-eared Pied Bat, Large Pied Bat
No	No	<i>Charadrius leschenaultii</i>	Greater Sand Plover, Large Sand Plover
No	No	<i>Climacteris picumnus victoriae</i>	Brown Treecreeper (south-eastern)
No	No	<i>Coleus habrophyllus</i>	

Direct impact	Indirect impact	Species	Common name
No	No	<i>Cupaniopsis shirleyana</i>	Wedge-leaf Tuckeroo
No	No	<i>Cyclopsitta diophthalma coxeni</i>	Coxen's Fig-Parrot
No	No	<i>Dasyurus hallucatus</i>	Northern Quoll, Digul [Gogo-Yimidir], Wijingadda [Dambimangari], Wiminji [Martu]
No	No	<i>Dasyurus maculatus maculatus</i> (SE mainland population)	Spot-tailed Quoll, Spotted-tail Quoll, Tiger Quoll (southeastern mainland population)
No	No	<i>Delma torquata</i>	Adorned Delma, Collared Delma
No	No	<i>Dichanthium setosum</i>	bluegrass
No	No	<i>Erythrorchis radiatus</i>	Red Goshawk
No	No	<i>Falco hypoleucos</i>	Grey Falcon
No	No	<i>Fontainea venosa</i>	
No	No	<i>Furina dunmali</i>	Dunmall's Snake
No	No	<i>Gallinago hardwickii</i>	Latham's Snipe, Japanese Snipe
No	No	<i>Geophaps scripta scripta</i>	Squatter Pigeon (southern)
No	No	<i>Grantiella picta</i>	Painted Honeyeater
No	No	<i>Hemiaspis damelii</i>	Grey Snake
No	No	<i>Hirundapus caudacutus</i>	White-throated Needletail
No	No	<i>Lathamus discolor</i>	Swift Parrot
No	No	<i>Leuzea australis</i>	Austral Cornflower, Native Thistle
No	No	<i>Macadamia integrifolia</i>	Macadamia Nut, Queensland Nut Tree, Smooth-shelled Macadamia, Bush Nut, Nut Oak
No	No	<i>Macadamia tetraphylla</i>	Rough-shelled Bush Nut, Macadamia Nut, Rough-shelled Macadamia, Rough-leaved Queensland Nut
No	No	<i>Macroderma gigas</i>	Ghost Bat
No	No	<i>Notelaea lloydii</i>	Lloyd's Olive
No	No	<i>Notelaea x ipsviciensis</i>	Cooneana Olive
No	No	<i>Petauroides volans</i>	Greater Glider (southern and central)

Direct impact	Indirect impact	Species	Common name
No	No	<i>Petaurus australis australis</i>	Yellow-bellied Glider (south-eastern)
Yes	No	<i>Phascolarctos cinereus</i> (combined populations of Qld, NSW and the ACT)	Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory)
No	No	<i>Planchonella eerwah</i>	Shiny-leaved Condoe, Black Plum, Wild Apple
No	No	<i>Potorous tridactylus tridactylus</i>	Long-nosed Potoroo (northern)
Yes	No	<i>Pteropus poliocephalus</i>	Grey-headed Flying-fox
No	No	<i>Rhodamnia rubescens</i>	Scrub Turpentine, Brown Malletwood
No	No	<i>Rhodomyrtus psidioides</i>	Native Guava
No	No	<i>Rostratula australis</i>	Australian Painted Snipe
No	No	<i>Samadera bidwillii</i>	Quassia
No	No	<i>Stagonopleura guttata</i>	Diamond Firetail
No	No	<i>Thesium australe</i>	Austral Toadflax, Toadflax
No	No	<i>Tringa nebularia</i>	Common Greenshank, Greenshank
No	No	<i>Turnix melanogaster</i>	Black-breasted Button-quail

Ecological communities

Direct impact	Indirect impact	Ecological community
No	No	Coastal Swamp Oak (<i>Casuarina glauca</i>) Forest of New South Wales and South East Queensland ecological community
No	No	Lowland Rainforest of Subtropical Australia
No	No	Poplar Box Grassy Woodland on Alluvial Plains
No	No	Subtropical eucalypt floodplain forest and woodland of the New South Wales North Coast and South East Queensland bioregions
No	No	White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland

4.1.4.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

Yes

4.1.4.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. *

The ecological assessment report (EAR-MNES) identifies that the proposed action will have the potential to impact on two threatened species, the Koala (*Phascolarctos cinereus*) and Grey-headed Flying fox (*Pteropus poliocephalus*). A full impact assessment has been undertaken and contained in Section 6.3 of this Report (attachments 5 and 6). The direct and indirect impacts on each is summarised below.

Koala (*Phascolarctos cinereus*)

Based on ecological surveys the site is known to be utilised by the Koala as evidenced by scats and scratches detected using a formal KSAT method during 2021 and 2024. Both the 2021 and 2024 KSAT identified that the proposed development of 5.22 ha is utilised by the species however comparatively activity levels were lower in the development footprint than the proposed Conservation area. As such the proposed development will remove 5.22ha of lower utilized habit than the retained conservation area totaling 5.61ha.

In order to determine the relative value of this habitat, qualitative and quantitative koala habitat surveys were undertaken during August 2021 using a plot-based methodology to determine the relative Koala habitat values across the site based on the Qld definition of Non-Juvenile Koala Habitat Trees (NJKHTs) and utility trees. The Koala Habitat Value Plot surveys also showed that the relative quality of koala habitat in the development footprint is lower than that recorded in the proposed conservations area. This is shown by both the higher density of NJKHTs and higher utility trees within the proposed retention areas relative to the development footprint.

Grey-headed Flying-fox (*Pteropus poliocephalus*)

The Grey-headed Flying-fox (*Pteropus poliocephalus*) was not recorded on the site despite specific spotlighting surveys undertaken for the species. However, based on habitats present and the species habitat preferences, records in the area, the species was considered as Likely to Occur in the Likelihood of Occurrence assessment and is considered a Subject Species for the proposed activity.

The amount of habitat to be cleared is up to 5.22 ha which would be used for foraging by the species however, the proposed development will retain 5.61 ha in a conservation area that will be subject to approved Management plans for the development including a Rehabilitation Management Plan. The impact area final development will incorporate native tree species that are known to provide nectar resources for the species and therefore in combination the management including active planting of the conservation area the residual loss of nectar resources will be reduced over time

A full Ecological Significant Impact Assessment is located in Att_5_Ecology Assessment Report Part A Chapter 6 pgs 31-72

4.1.4.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact?

*

Yes

4.1.4.5 Describe why you consider this to be a Significant Impact. *

In the absence of mitigation measures the clearing of 5.22ha of Foraging habitat as a result of the proposed action has the potential to result in a significant impact on the Grey-headed Flying-fox and the Koala when assessed against the Significant Impact Guidelines 1.1, as this habitat is considered critical to the species survival.

Koala (*Phascolarctos cinereus*)

The site is known to provide habitats used by the Koala for foraging, shelter, movement and potentially breeding and dispersal purposes. As such the habitat within the proposed development footprint and conservation areas could be considered as habitat critical to the survival of a species.

The ecological studies determined that the proposed development footprint was not used frequently and show that the relative quality of koala habitat in the development footprint is lower than that recorded in the proposed conservation areas. This is shown by both the higher density of NJKHTs and higher utility trees within the proposed retention areas relative to the development footprint.

While the habitat within the proposed development is defined as habitat critical to the survival of this species, the loss of 5.22ha could be considered as posing a low potential for significant impact under this criterion. However, when the proposed activity is considered in conjunction with the approved management measures that have been conditioned by the State government, the Rehabilitation Plan, Clearing Extents Plan and the Koala Management Plan, there is a likelihood that remaining habitats will be improved over time through active planting, allowing regeneration and succession and, Koala habitats would not be subject to increased threats such as weed invasion. While the loss of a small area of low-quality habitat within the proposed development footprint is considered as posing a low potential for significant impact, when considering the management measures the residual impacts would be negligible and that the proposed offsets would more than compensate for this habitat loss.

Grey-headed Flying-fox (*Pteropus poliocephalus*)

Habitat critical to the survival of Grey-headed Flying-fox is identified in the National Recovery Plan for the Grey-headed Flying-fox (*Pteropus poliocephalus* (DAWE 2021) ("The Recovery Plan") are vegetation communities that contain important winter and spring flowering species including; *Eucalyptus tereticornis*, *E. albens*, *E. crebra*, *E. fibrosa*, *E. melliodora*, *E. paniculata*, *E. pilularis*, *E. robusta*, *E. seeana*, *E. sideroxylon*, *E. siderophloia*, *Banksia integrifolia*, *Castanospermum australe*, *Corymbia citriodora citriodora*, *C. eximia*, *C. maculata*, *Grevillea robusta*, *Melaleuca quinquenervia* or *Syncarpia glomulifera*.

As the study area supports Open forest analogous to Remnant Regional Ecosystem 12.9-10-2 which contains a number of these winter flowering species as overstorey dominant /co dominant species including but not limited to *Corymbia citriodora*, *E. crebra*, *E. tereticornis*, *E. major/paniculata* and *E. siderophloia*. In addition, two Nationally Important Flying-fox Camps occur within 20km of the study area.

As such, the study area supports habitat critical to the survival of Grey-headed Flying as defined by the Recovery Plan. As Regional Ecosystem 12.9-10-2 is widespread in the South east QLD bioregion and is estimated to have an extant area of 86000 ha (2021) (Accad, Aet.al.2024) the loss of 5.22ha is less than 0.006% of the extent of this vegetation type in Qld. Locally, this Regional ecosystem is well represented in conserved with large areas in Goodna, Greenbank and Springfield areas which are in closer proximity to the nationally important camps. Notwithstanding the ecological investigations demonstrate that the proposed clearing area is lower quality, supporting lower densities of mature trees and less trees (above 10cm dbh) than the retained conservation area.

In addition, the Rehabilitation Plan and Koala Management plan as approved under state legislation, will result in the active planting of Winter flowering species within the landscaping and conservation areas providing for future nectar resources for the species.

While the loss of a small area of low-quality habitat within the proposed development footprint is considered as posing a low potential for significant impact, when considering the management measures the residual impacts would be negligible and that the proposed offsets would more than compensate for this habitat loss.

4.1.4.7 Do you think your proposed action is a controlled action? *

Yes

4.1.4.8 Please elaborate why you think your proposed action is a controlled action. *

In the absence of the ongoing management and mitigation including offsets, the assessment of significant impact determined that the proposed activity is likely to result in a significant impact on both the Koala and Grey-headed Flying Fox as the proposed development requires clearing and modification of 5.22 ha which is deemed as habitat critical to the survival of both species. As such, the proposed action requires referral pursuant as a controlled action.

Notwithstanding as the action has been approved pursuant to state legislations with conditions including defined footprints and the retention of a conservation that will be subject to approved management plans, the action is considered as a having a low potential for significant impact and an offset will be provided the residual impacts will be compensated and as such the action may warrant a Not controlled particular manner decision.

4.1.4.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. *

The Abadi Gaia Adult Residential Village has been approved by the Queensland State Assessment and Referral Agency (SARA) and Ipswich City Council. SARA's approval related to matters of State Environmental Significance (MSES); namely approval against the assessment benchmarks of the Development in South East Queensland Koala Habitat Area, State Development Assessment Provisions (State Code 25). Ipswich City Council subsequently approved the Material Change of Use (MCU) for the proposed development.

The approvals include a number of conditions including requirements that the development must be constructed and operated in accordance with a number of Environmental Management plans including;

- Vegetation Management Plan
- Koala Management Plan, and
- Rehabilitation management plan

In addition, the conditions require that the proponent deliver an environmental offset in accordance with the Environmental Offsets Act 2014 to counterbalance the significant residual impacts on the matter of state environmental significance being clearing of 1,729 non-juvenile koala habitat trees.

With consideration of the management measures and other conditions of consent, including the requirement for offsets, it is considered that the proposed would not result in the potential for residual impact on either the Koala and Grey-headed Flying Fox.

The mitigation and management measures are included as conditions in the State Assessment and Referral Agency Responses and associated approved plans are contained in Att_2_State Assessment and Referral Agency Response (pgs 1-10) and Att_3_State Assessment and Referral Agency Approved Plans (pgs 1-15)

4.1.4.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. *

PGS Invest Pty Ltd is committed to ensuring meaningful offsets are achieved and has advanced discussions to secure a physical site for environmental offsets in the Minjehla Dhagun Conservation area under the jurisdiction of the board of Yugambah Land Enterprises. The Applicant will, prior to clearing works, make an application (and approval) in accordance Queensland Environmental Offset Framework. This offset area will be subject to revegetation including the planting and management of Koala feed trees at a ratio of three times the removed Non-Juvenile Koala Trees (NJKTs) as per the State Assessment and Referral Agency Response totaling at least 5187 koala food tree species over an area of greater than 15.6ha however, exact areas are yet to be determined. For Required Offsets please refer to Att_2 State Assessment and Referral Agency Response, Condition 13 page 6.

With consideration of the management measures and other conditions of consent, including the requirement for offsets, it is considered that the proposed action is unlikely to result in the potential for residual impact on either the Koala or Grey-headed Flying Fox.

4.1.5 Migratory Species

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	Species	Common name
No	No	Actitis hypoleucos	Common Sandpiper
No	No	Apus pacificus	Fork-tailed Swift
No	No	Calidris acuminata	Sharp-tailed Sandpiper
No	No	Calidris ferruginea	Curlew Sandpiper
No	No	Calidris melanotos	Pectoral Sandpiper
No	No	Charadrius leschenaultii	Greater Sand Plover, Large Sand Plover
No	No	Cuculus optatus	Oriental Cuckoo, Horsfield's Cuckoo
No	No	Gallinago hardwickii	Latham's Snipe, Japanese Snipe
No	No	Hirundapus caudacutus	White-throated Needletail
No	No	Motacilla flava	Yellow Wagtail

Direct impact	Indirect impact	Species	Common name
No	No	Tringa nebularia	Common Greenshank, Greenshank

4.1.5.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.5.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The proposed Retirement and aged care facility site does not provide estuarine or wetland habitats for the waders and waterbirds (Sandpipers, Snipe, Plovers) and does not provide any suitable open habitats for the Yellow wagtail. The White -throated Needletail may forage above the sites habitats however is extremely unlikely to utilise the site for roosting purposes. The Oriental Cuckoo may utilise the site on occasional for foraging however the area of potential habitat affected is considered negligible in the context of appropriate habitat in the local area and region however the management measures associated with the action will increase the ecological value of conservation area which would continue to be used by the species.

4.1.6 Nuclear

4.1.6.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.6.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The action does not include any nuclear activities or use any nuclear material.

4.1.7 Commonwealth Marine Area

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.7.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.7.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

There are no Commonwealth Marine areas located near the proposed action that could be impacted directly or indirectly by the action.

4.1.8 Great Barrier Reef

4.1.8.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.8.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The Great Barrier Reef will not be impacted directly or indirectly by the proposed action.

4.1.9 Water resource in relation to large coal mining development or coal seam gas

4.1.9.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.9.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The action is not a large coal mining development or coal seam gas project.

4.1.10 Commonwealth Land

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.10.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.10.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The PMST identified that the proposed development occurs within the buffer area of two Commonwealth Defense Areas with 18 features in total namely the Greenbank Training Area and the Sanananda Barracks - Wacol. The proposed action will not impact on any Commonwealth Defence area or feature.

4.1.11 Commonwealth Heritage Places Overseas

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.11.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.11.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The action will not impact on any Commonwealth Heritage Places Overseas.

4.1.12 Commonwealth or Commonwealth Agency

4.1.12.1 Is the proposed action to be taken by the Commonwealth or a Commonwealth Agency? *

No

4.2 Impact summary

Conclusion on the likelihood of significant impacts

You have indicated that the proposed action will likely have a significant impact on the following Matters of National Environmental Significance:

- Threatened Species and Ecological Communities (S18)

Conclusion on the likelihood of unlikely significant impacts

You have indicated that the proposed action will unlikely have a significant impact on the following Matters of National Environmental Significance:

- World Heritage (S12)
- National Heritage (S15B)
- Ramsar Wetland (S16)
- Migratory Species (S20)
- Nuclear (S21)
- Commonwealth Marine Area (S23)
- Great Barrier Reef (S24B)
- Water resource in relation to large coal mining development or coal seam gas (S24D)
- Commonwealth Land (S26)
- Commonwealth Heritage Places Overseas (S27B)
- Commonwealth or Commonwealth Agency (S28)

4.3 Alternatives

4.3.1 Do you have any possible alternatives for your proposed action to be considered as part of your referral? *

No

4.3.8 Describe why alternatives for your proposed action were not possible. *

Abadi Gaia Adult Residential Village has been master planned to avoid The site is located close to a designated major urban centre, bound by road network, fronts Church Street a major regional interconnector road, elevated, free draining, contains shallow nutrient poor soils overlaying sandstone rock, was previously stripped for logging and barren until the 90's The site has been subject to numerous residential development scenarios over the past decade.

The site was initially approved as a 50 Lot residential development in 2009. This development would have.

- Severed Koala movement pathways across Bertha Street.
- Resulted in the loss of 6.84ha of Koala Habitat.
- Increased traffic movements.
- Resulted in numerous increased risks such as road strike within the development, large dogs with no restriction to type or number, construction of a dangerous residential structure such as pools and fencing; and
- No opportunity for the implementation of management plans and as such would result in further degradation of Koala habitats through weed invasion, dumping and pollutants and dog attacks, no opportunity for revegetation.

It is also pertinent to note that, should this development be constructed under new bushfire requirements that further clearing may be required.

Development Scenario 2- Large Lot Residential Development

The second development scenario was a large residential development yielding 20 x 4000 m² lots. The large lot design poses largely the same risks however larger areas of vegetation could be contained within lots, but it is considered that the majority if not all the Koala habitat would be lost. The issues associated with this development type include.

- Severed Koala movement pathways across Bertha Street.
- Resulted in the loss of 6.98 ha of Koala Habitat.
- Increased traffic movements.
- Increased risks such as road strike within the development, large dogs with no restriction to type or number, construction of a dangerous residential structure such as pools and fencing; and
- No opportunity for the implementation of management plans and no opportunity for revegetation.

Development Scenario 3- Original Masterplan of the Abadi Gaia Adult Residential Village

The original design of the adult residential village incorporated a dementia care centre that fronted Bertha Street in the east of the site and a significant recreation area including tennis courts, bowling greens and other facilities abutting the residential aged care accommodation.

This development would have.

- Severed or reduced Koala movement pathways across Bertha Street.
- Resulted in the loss of ~7.9ha of Koala Habitat.
- Resulted in numerous increased risks such as road strike within the development, large dogs with no restriction to type or number, construction of a dangerous residential structure such as pools and fencing; and
- An opportunity for the implementation of management plans in perpetuity.

Development Scenario 4- Proposed Masterplan of the Abadi Gaia Adult Residential Village – CURRENT

The final design has been able to improve the areas planned for retention/rehabilitation from 3.5 hectares to 5.61 hectares in the current masterplan and the development is situated in lower quality koala habitat areas of the site. This is the result of a significant body of project re-design work which was led by field survey results and associated recommendations around the minimisation of impacts on koala habitat. In addition, potential koala feed and sheltering species are to be used within landscaped areas between the proposed built form and alongside internal roads. In this way, opportunities are provided for koalas to move through the developed area.

The proposed recreation facilities previously proposed in the south of the site have been removed from this location based on the recommendations of ecologists. These facilities have been re-sited to the north of the site to:

- Improve the integrity of the southern (east-west) corridor and.
- Remove the facilities from an area of relatively high koala activity usage levels.

The additional studies conducted in 2021 (as detailed in the EAR) using the Koala Habitat Values Plots supported this assessment as the number of Non Juvenile Koala Habitat Trees (NJKHTs) recorded were higher in all plots within the conservation and corridor areas when compared to the development area (range 69 -116 NJKHTs). The average number of NJKHTs in plots within the development area was calculated to be 339 per hectare, compared to 553.6 trees per hectare in the Conservation Area.

In terms of Koala Tree utility, there was a significantly higher proportion of higher utility tree species, “primary” tree species such as *Eucalyptus tereticornis* and *E. propinqua* within the conservation and corridor area than was recorded in the proposed development footprint.

It is also proposed to retain all trees >4 m high within the 25 m wide Asset Protection Zones (APZ) required for the proposed development. Consistent with *Bushfire Management Plan 107 Bertha Road, Goodna* (Rob Friend & Associates Pty Ltd, 2021), vegetation removal within APZ is to be limited to shrubs and low trees to 4 m in height with regular slashing of ground cover to occur. It is noted however that a 10 m wide zone is proposed around buildings (‘construction buffer area). This forms the inner 10 m of the APZ and is to be cleared to facilitate construction and access. This area will be landscaped with a mosaic of slashed grass and koala feed/shelter trees as outlined by the Concept Rehabilitation Plan (New Ground, 9 October 2021).

This current design is supported by the site-specific management plan for Koalas (Koala Management Plan, 9 October 2021) and revegetation maximises the existing corridors along the southern and eastern sections of the site.

In addition, and except where they cannot be avoided, barriers to movement posed by retaining walls will be replaced by battered areas which fall within the clearing footprint of the APZ. These areas will be revegetated with Koala food trees to the maximum density allowed pursuant to the Bushfire Management Plan and each tree within this area and any tree lost will be replaced in perpetuity, maintaining the habitat values and conserving/enhancing the maximum habitat resources for the Koalas as possible.

This development proposes to:

- Maintain Koala movement pathways across Bertha Street and Church Street.
- Additional planting of trees along Church Street.
- Result in the loss of ~5.1 ha of Koala Habitat Area as well as thinning in APZ which can be utilised at reduced tree densities.
- Allow for retention/restoration of ~5.61 ha of bushland habitat. In addition. ~0.8 ha of koala-sensitive landscaped area is proposed amongst built form to improve site permeability to Koalas.
- Minor increase in traffic movements but offset by additional lighting and koala signage and the decrease in speed associated with the development.

- Low risks of road strike within the development, restriction on dogs and all structures such as fencing will be Koala friendly.
- An opportunity for the implementation of management plans in perpetuity, with a defined management responsibility and grounds staff/contractors undertaking works in accordance with approved management plans.
- Implement a coordinated and ongoing fire management strategy (allowing for minimal vegetation clearing in APZs).
- Minimise fencing and maintain a highly permeable footprint.

The recreational facilities are >175 m from the southern corridor boundary and 135 m from Bertha Street. Site inspections identified that the proposed location of the recreational facility avoids higher utility koala tree species (as defined by Appendix 4 of the *Spatial Modelling for koalas in South East Queensland*, DES 2021); with the area co-dominated by *Eucalyptus moluccana* and *Lophostemon suaveolens* which are medium and lower koala utility species respectively. It is noted that the client intends to establish in excess of 30 individual higher koala utility trees in this area; introducing higher utility (quality) potential foraging resources. These revegetation works will link in with the drainage restoration works, Ric Nattress Park and northern property vegetation, enhancing on site and external movement patterns.

The facilities have been designed to be permeable to koala movement throughout (i.e. koala friendly fencing and a lack of building structures). Notwithstanding, the proposed 400m² on grade dog park will be koala exclusive (via exclusion fencing). The recreation area will provide a flat, permeable, soft and easily trafficked zone for koalas.

It is demonstrated that the proponent has sought to reduce impacts on koala habitat throughout the design process from an approved residential development, throughout various design changes with reference to ecological planning inputs that have resulted in reductions of the development footprint over the site. The development is also sited on areas of the site that are of a lower habitat value relative to retained conservation and corridor areas. The facility (development area) itself is intended to allow Koala movement and will be planted with Koala feed trees. In addition, there is a suite of mitigation measures proposed to further reduce any potential impacts on Koalas (and habitat) through active management measures implemented in perpetuity under a management framework consistent with the requirements of the Retirement Villages Act to ensure ongoing and coordinated management of the site.

5. Lodgement

5.1 Attachments

1.2.1 Overview of the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att_1_Community Needs Assessment.pdf Community Needs Assessment	12/12/2020	Low	High
#2.	Document	Att_2_State Assessment and Referral Agency Response.pdf Qld State Assessment and Referral Agency (SARA) Response	18/04/2020	Low	High
#3.	Document				

	Att_3_State Assessment and Referral Agency Approved Plans.pdf Qld State Assessment and Referral Agency (SARA) Approved Plans	18/04/2020	High
#4.	Document Att_4_Ipswich City Council Decision Notice.pdf Ipswich City Council Approval	03/08/2020	High
#5.	Document Att_5_Ecological Assessment Report Part 1.pdf Ecological Assessment Report - Review of MNES	09/12/2020	High
#6.	Document Att_6_Ecological Assessment Report Part 2.pdf Ecological Assessment Report - Review of MNES	09/12/2020	High
#7.	Document Att_7_Abadi Gaia Operational Management Plan -No Appendices.pdf Environmental Operational Management Plan	09/12/2020	High

1.2.7 Public consultation regarding the project area

Type	Name	Date	Sensitivity	Confidence
#1.	Document Att_8_Public Consultation Documentation.pdf Public Consultation Documentation	19/01/2025	Yes	High

3.1.1 Current condition of the project area's environment

Type	Name	Date	Sensitivity	Confidence
#1.	Document Att_5_Ecological Assessment Report Part 1.pdf Ecological Assessment Report - Review of MNES	09/12/2020	No	High

3.2.1 Flora and fauna within the affected area

Type	Name	Date	Sensitivity	Confidence
#1.	Document Att_5_Ecological Assessment Report Part 1.pdf Ecological Assessment Report - Review of MNES	09/12/2020	No	High
#2.	Document Att_6_Ecological Assessment Report Part 2.pdf Ecological Assessment Report - Review of MNES	09/12/2020	No	High

3.2.2 Vegetation within the project area

Type	Name	Date	Sensitivity	Confidence
#1.	Document Att_5_Ecological Assessment Report Part 1.pdf Ecological Assessment Report - Review of MNES	09/12/2020	No	High
#2.	Document Att_6_Ecological Assessment Report Part 2.pdf Ecological Assessment Report - Review of MNES	09/12/2024		High

3.4.1 Hydrology characteristics that apply to the project area

Type	Name	Date	Sensitivity	Confidence
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#1.	Document Att_10_Stormwater Management Plan Part B.pdf Stormwater Management Plan Part B	12/12/2021	No	High
#2.	Document Att_9_Stormwater Management Plan Part A.pdf Stormwater Management Plan Part A	12/12/2021	No	High

4.1.4.2 (Threatened Species and Ecological Communities) Why your action has a direct and/or indirect impact on the identified protected matters

Type	Name	Date	Sensitivity	Confidence
#1.	Document Att_5_Ecological Assessment Report Part 1.pdf Ecological Assessment Report - Review of MNES	09/12/2021	No	High

4.1.4.10 (Threatened Species and Ecological Communities) Avoidance or mitigation measures proposed for this action

Type	Name	Date	Sensitivity	Confidence
#1.	Document Att_2_State Assessment and Referral Agency Response.pdf Qld State Assessment and Referral Agency (SARA) Response	18/04/2021	No	High
#2.	Document Att_3_State Assessment and Referral Agency Approved Plans.pdf Qld State Assessment and Referral Agency (SARA) Approved Plans	18/04/2021	No	High

4.1.4.11 (Threatened Species and Ecological Communities) Proposed offsets relevant to avoidance or mitigation measures

Type	Name	Date	Sensitivity	Confidence
#1.	Document Att_2_State Assessment and Referral Agency Response.pdf Qld State Assessment and Referral Agency (SARA) Response	18/04/2021	No	High

5.2 Declarations

Completed Referring party's declaration

The Referring party is the person preparing the information in this referral.

ABN/ACN 31146671481
 Organisation name NEW GROUND ENVIRONMENTAL PTY LTD
 Organisation address Po Box 713 Mermaid Beach 4218 QLD

Representative's name	Brett Campbell
Representative's job title	Principal Environmental Scientist
Phone	0467703868
Email	bcampbell@newground.com.au
Address	Gold Coast 6A & 6B 2563 Gold Coast Highway, Mermaid Beach QLD 4218

Check this box to indicate you have read the referral form. *

I would like to receive notifications and track the referral progress through the EPBC portal. *

By checking this box, I, **Brett Campbell of NEW GROUND ENVIRONMENTAL PTY LTD**, declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. *

I would like to receive notifications and track the referral progress through the EPBC portal. *

Completed Person proposing to take the action's declaration

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

ABN/ACN	58155821346
Organisation name	PGS INVEST PTY LTD
Organisation address	4217 QLD
Representative's name	Adam Slijderink
Representative's job title	Chief Executive Officer
Phone	0404000403
Email	adam@cli.net.au
Address	8 Glenwater Crescent Helensvale, QUEENSLAND, 4212

Check this box to indicate you have read the referral form. *

I would like to receive notifications and track the referral progress through the EPBC portal. *

I, **Adam Slijderink of PGS INVEST PTY LTD**, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf or for the benefit of any other person or entity. *

I would like to receive notifications and track the referral progress through the EPBC portal. *

Completed Proposed designated proponent's declaration

The Proposed designated proponent is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

Check this box to indicate you have read the referral form. *

I would like to receive notifications and track the referral progress through the EPBC portal. *

I, **Adam Slijderink of PGS INVEST PTY LTD**, the Proposed designated proponent, consent to the designation of myself as the Proposed designated proponent for the purposes of the action described in this EPBC Act Referral. *

I would like to receive notifications and track the referral progress through the EPBC portal. *