

SUBMISSION RELATING TO ECOLOGICAL IMPACT ASSESSMENT REPORT OF THE PROPOSED 50 LOT SUBDIVISION OF 2A AND 2B RIFLE RANGE ROAD MT LOFTY

The Ecological Assessment Report lodged with the Applicant's Development Application has been reviewed and amended 4 times because of errors and inconsistencies in the Report.

The Report was prepared by way of a desktop assessment and field survey of the flora and fauna which were conducted over 3 years ago on 3rd and 4th April 2023 and a daytime assessment over 2 years ago on 9th April 2024. No night time assessment of the site has been undertaken. It also relied on an Environmental Overlay of 2012/2018 which is over 14 years old. The Report has been prepared with assessments that are out of date and do not reflect the current state of the site, for example the number of native trees, their size and their location. The Ecological Report that was initially lodged with the Application differs considerably with each subsequent Ecological Report that has prepared. For example, the number of ecological significant native trees differ considerably in each report. The number of trees onsite differs and also the number to be removed differs. This includes the removal of 2 significant native trees on the road reserve in Windemere Terrace.

Koala Habitat area

Despite the Ecological Report stating that no koalas were present (noting that only 3 visits to the site were conducted) local residents have sighted koalas on occasions with koalas even appearing on their decks. The destruction of so many koala trees marked in the Koala habitat area referred in the Report cannot be compensated by the planting of tube stock of unknown trees. These koala trees have been growing for many, many years. The tube stock will take many years to grow and there is no guarantee they will grow. There are no specifications in any of the reports as to who maintains the tube stock trees. These trees will require considerable care in their early years to enable them to grow to maturity. The Bureau of Meteorology are predicting El Nino conditions during the coming year. The use of the land by koalas and the use of the land of people are not compatible. Numerous factors such as cars and domestic animals pose a serious threat to koalas in addition to the increase of noise and light associated with the development. The Koala Habitat area borders the new road between MacKenzie Road and Rifle Range Road. The covenants proposed to maintain the land will depend on owners of the land abiding by the Covenants and council enforcing the Covenants. This does not always occur as seen by the fact that the owner of the land and Council have failed in their duty to control the growth of noxious

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weeds on the land marked as koala habitat such as lantana and privet. This is one of the major reasons identified in the Ecological Report that the use of the land is limited.

BIRDS AND OTHER ANIMALS

The Protected Matters Search Report referred to in the Ecological Assessment Report indicates there are 8 threatened ecological communities within a 5 klms radius of the site. This includes 21 flora species, 19 birds, 12 mammals, and 6 reptiles. The Report identifies 10 bird species on the site. In addition to those mentioned in the report we have observed a number of other species of birds as we have done the Aussie Bird Count each year. Many of these birds are rarely seen and are therefore very vulnerable. We have observed a Magpie nesting in the same tree with its young for many years. This tree is marked to be removed. We have observed a family of kookaburras that nest in a hollow of a gum tree that is many years old. An old hollow tree is the only place a kookaburra nests. This tree is to be removed.

The Ecological Report states that the site contains numerous flowering and fruiting trees which provide feeding resources and breeding places for birds, mammals and reptiles. The proposed planting of tube stock of unknown trees by the developer will not remedy the significant adverse effects the destruction of these trees and other vegetation on the site. The replanted trees will take many years to grow to sufficient maturity to enable the trees to be used by birds and other animals for breeding, feeding and living.

Many of the native trees to be removed are of a significant age and have birds nesting in them. The subdivision also houses endangered flying foxes, microbats, native bee hives, echidnas, bandicoots, kangaroos, wallabies, possums, goannas, snakes, lizards and an abundance of bird life. All which are endemic to Toowoomba area and to the escarpment. These have not been reported in any of the Ecological Reports. The area marked for Koala Habitat also has many discrepancies in established native trees numbers. Many of these trees to be removed are over 50 years old. These trees are reported from a Council Overlay that has not been updated and revised for many years.

The Ecological Report at paragraph 2.4 includes a disclaimer that the Report only gives a snapshot picture of the site and may not provide a true indication of the presence or absence of flora and fauna within the site.

It is essential that Council give significant consideration to the observations of residents who have lived within the vicinity of the site for many years and give preference to those

observations over the Consultants who prepared the Report with very limited assessment of the site.

A Peer Review of the Report needs to be undertaken to determine whether there are any other errors, inconsistencies or inadequacies in the Report. A further Ecological Assessment Report should be prepared detailing the current flora and fauna on the site.

Anthony & Jo Collins

DATED 01/5/26

LOKARD 25/5/26

MAXP14



Remove 2 SIGNIFICANT TREES Council Controlled trees

(Council Controlled Trees)	
Project: Ecological Assessment Report, Rifle Range Road	
Client: CPLK Property Pty Ltd	
Project No.: J001771	
Compiled by: Skytekton Date: 5/05/2026 Approved by: Will Gibson Date: 5/05/2026	
0 30 60 Metres	
Legend	
Cadastre	Roads
Road Reserve	Lot Layout
Stormwater	Easement
Building Location	Envelope
Covenant Area	Revegetation Area (Retain Vegetation and Replanting to 250/ha Density)
Biodiversity Corridors	Areas of Ecological Significance
Areas of Ecological Significance	Areas of Ecological Significance Buffer
Tree Survey Area	Remove Native Tree (84)
Remove Native Tree (Ecological Buffer) (4)	

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Source: Cadastre data sourced from DNRME (2025). Aerial imagery sourced from Nearmap (2025).

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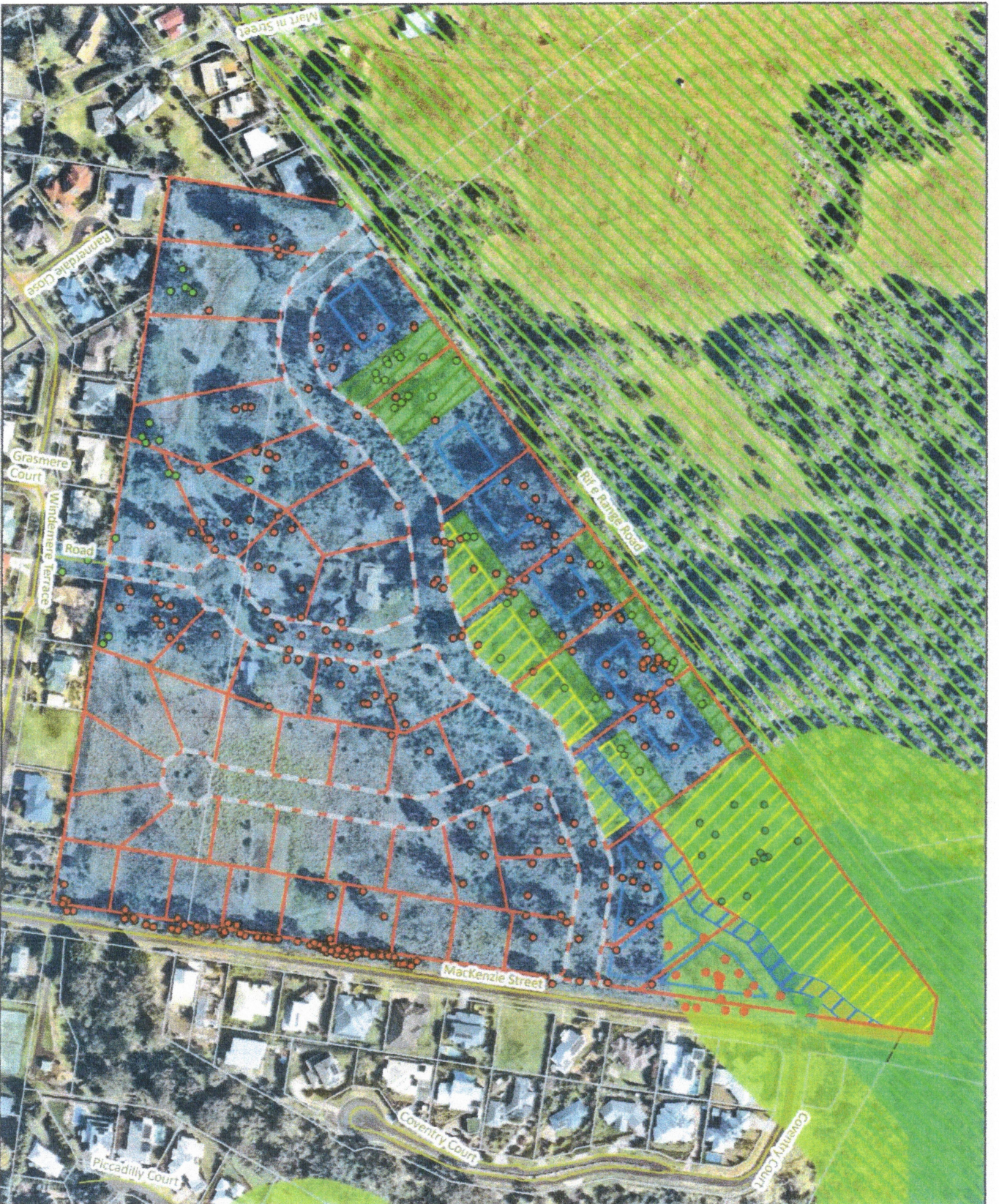


Figure 13
Local Native
Tree Impact
Assessment

Project: Ecological
Assessment Report,
Rifle Range Road

Client: CPLK Property
Pty Ltd

Project No.: J001771

Compiled by: SayeMellon Date: 24/07/2025
Approved by: Will Gibson Date: 24/07/2025



- Legend**
- Cardinal
 - Roots
 - Leaf Layout
 - Road Reserve
 - Sewerwater Treatment
 - Future Building
 - Significance
 - Envelopes
 - Concurrent Analysis
 - Tree Retention
 - Area (Retain Vegetation)
 - Revegetation
 - Area (Reclaim Vegetation and Reporting to 2500 (a Density))
 - Tree Survey
 - Area
 - Unsurveyed Area due to Topography
 - Productivity
 - Corridors
 - Area of Ecological Significance
 - Area of Ecological Significance Buffer
 - Reclaim Native Tree (47)
 - Reclaim Native Tree (Ecological Significance) (22)
 - Reclaim Native Tree (Ecological Buffer) (13)
 - Remove Native Tree (270)
 - Remove Native Tree (Ecological Buffer) (18)

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Source: Cadastre data sourced from DNRME (2024). Aerial imagery sourced from Mapbox (2024).

