

Our ref: STP4702
Contact: Alex Steffan | alex@steffanharries.au
Website: www.steffanharries.au
Phone: 07 3317 0042



Monday, 17 August 2026

Chief Executive Officer
Brisbane City Council
GPO Box 1434,
Brisbane QLD 4001

Attention: Shirley Mills
Via email: Shirley.Mills@brisbane.qld.gov.au

RE: RESPONSE TO INFORMATION REQUEST

Reconfiguring a Lot (1 into 13)
COUNCIL REF: [A006963905](#)
135 Caladium Street, Wakerley QLD 4154
Lot 1 on RP79352

Dear Shirley,

I refer to the Information request received from Brisbane City Council dated 24 March 2026 in relation to the development application lodged for a Reconfiguring a Lot (1 into 13) at 135 Caladium Street, Wakerley. On behalf of the applicant, Steffan Harries provides the following response in addition to the following attachments:

- **Appendix A** – Concept structure plan
- **Appendix B** – Updated subdivision proposal plan
- **Appendix C** – Ecological response to the RFI
- **Appendix D** – Traffic engineering response to the RFI
- **Appendix E** – Civil engineering plans
- **Appendix F** – Stormwater management plan
- **Appendix G** – Civil engineering response to the RFI

Matter Raised:

Structure Plan

1. As the subject site is zoned Emerging community zone, a structure plan is required to be provided to show the site constraints and how the site to the south will be redeveloped.
 - (a) Provide a basic structure plan to show how access would function for the adjoining lot to south and demonstrate how this lot could develop independently in accordance with AO18.1/PO18 of the Subdivision code. The structure plan should also include the site

constraints such as significant vegetation and flooding as well as map the connections to the ecological corridors to the north and to the east.

Response:

A structure plan has been prepared and is provided in response to this matter, in accordance with AO18.1 of the Subdivision code, which requires: "Development is designed and sited in compliance with: ... b. a structure plan prepared in accordance with the Structure planning planning scheme policy", noting that "A structure plan must be prepared where in the Emerging community zone."

The structure plan demonstrates the site constraints affecting the subject land, including significant vegetation and flooding, maps the connections to the ecological corridors to the north and east, and shows how the adjoining lot to the south can function and be developed independently of the subject site, consistent with PO18 of the Subdivision code ("Development delivers contained, sustainable and functional communities ... j. site characteristics and setting are addressed including character and environmental values and development constraints, as detailed in an applicable neighbourhood plan or overlay or as determined through a structure planning process").

Please refer to the enclosed Structure Plan / Concept Plan for the response to this matter – attached as **Appendix A**.

Matter Raised:**Ecological Values**

2. The site is entirely mapped under the Biodiversity areas overlay under the sub-categories of High Ecological Significance (HES), High Ecological Significance Strategic (HESS) and Koala Habitat. The proposed development seeks to retain under one-third of these mapped values (~3,177m² of 10,218m²) within the eastern portion of the site, by placing Development Footprints on proposed lots 11-13. The site represents a key link in a broader ecological corridor through the landscape, which retains significant biodiversity within the area and functions as a wildlife movement corridor. In accordance with PO4 of the Biodiversity areas overlay code, mapped ecological features must be protected, conserved and restored. Furthermore, PO5 of the Wakerley neighbourhood plan states development must be designed to retain and enhance significant natural environmental values, including wildlife habitat and movement functions. The submitted Tree Survey Plan shows retention of all vegetation along the Basella Street frontage despite proposed civil works causing major encroachment into the Notional Root Zone's (NRZ's) of these trees. No supporting arboricultural advice has been provided to support the retention of this vegetation, and based on civil design and proposed lot density, it is unlikely this vegetation can be retained. Furthermore, all trees are proposed for removal within proposed Lot 11, including those outside the nominated Development Footprint. As such, the proposal has not demonstrated compliance with the Biodiversity areas overlay code and the Wakerley neighbourhood plan, given movement corridors are disrupted and the majority of native vegetation has not been protected. Further retention of ecological values is required, including preservation of all native vegetation within 20 metres of the northern site boundary, along with additional retention opportunities within Lots 12 and 13, particularly where Development Footprints are shown. Achieving this outcome will require the consolidation of lots to create larger lifestyle lots that enable protection of ecological values within designated Environmental Protection Zones.
 - (a) Provide a revised Subdivision Plan consolidating lots to ensure retention of native vegetation within designated Environmental Protection Zones along the northern and eastern boundaries of the site as described above.
 - (b) Provide a revised Tree Retention Plan to reflect the updated Subdivision Plan. This plan must include the proposed development plan (as an overlay) including all

services/infrastructure on site and external to the site, clearly showing the full extent of all earthworks (cut/fill) required.

Note: If works encroach into the NRZs of any trees identified to be retained, a report from a qualified arborist (minimum AQF level 5 Arboriculture) is required to demonstrate no negative impacts on the long-term health of the trees.

Response:

The Subdivision Plan (**Appendix B**) and Tree Retention Plan (**Appendix C**) have been revised to substantially increase the area of vegetation retained. The revised layout retains the north to south ecological connectivity of the site through modifications to the subdivision layout, including an increase in the length and extent of retained native vegetation along the northern portion of the site, compared to the previously lodged layout.

PO4 of the Biodiversity areas overlay code requires that, where a site is wholly or partly in the High ecological significance sub-category or High ecological significance strategic sub-category, "ecological features and ecological processes, koala habitat trees, areas of strategic biodiversity value, waterways and wetlands ... are protected, conserved and restored to ensure the area's long-term viability." The revised design demonstrably advances this outcome by consolidating and connecting retained vegetation along the eastern and north-eastern portions of the site.

Retention of vegetation along the north-western site boundary is constrained by the road widening and drainage works necessary to deliver the Basella Street/Caladium Street road corridor improvements sought elsewhere in this Information Request (see our response to Matters 5, 8 and 10), which are required for the safety and function of the wider road network. This is an unavoidable and limited residual impact, for which an Offset Delivery Strategy has been prepared (refer to our response to Matter 3). On this basis, we consider the revised design achieves the intent of PO4 to the maximum extent practicable, having regard to the necessary engineering outcomes for the benefit of the wider community.

Matter Raised:

Ecological Values

3. The proposed removal of ecological values is likely to result in a significant residual impact and therefore require environmental offsets in accordance with PO9 of the Biodiversity areas overlay code. Although the submitted Ecology Assessment Report prepared by Newground indicates specific areas on site will undergo rehabilitation in accordance with PO4 of the Biodiversity areas overlay code, no response to PO9 of the code has been provided.

- (a) Provide an Offset Delivery Strategy that confirms the total impact area to be offset (noting changes required to retention of vegetation above), in accordance with PO9 of the Biodiversity areas overlay code and the Offsets Planning Scheme Policy. This must include a plan identifying the existing Biodiversity areas overlay (HES/HESS) together with the extent of development footprint impacting upon mapped areas (e.g. development areas, roads, building envelopes, service alignments and access for construction works).

Response:

An Offset Delivery Strategy has been prepared in accordance with PO9 and AO9 of the Biodiversity areas overlay code, which provide: "Development which has or is likely to have a significant residual impact on a matter of State environmental significance or a matter of local environmental significance, after all reasonable on-site mitigation measures have been or will be undertaken, provides an environmental offset", noting that offsets are "provided in compliance with the Queensland environmental offsets framework and the Offsets planning scheme policy."

The revised development footprint results in the clearing of 2,416m² of High Ecological Significance Strategic (HESS) sub-category land mapped under the Biodiversity areas overlay, after accounting for existing cleared areas, the existing dwelling and ancillary structures on site.

A financial settlement offset has been calculated using the Queensland Government's Financial Settlement Offset Calculator, in accordance with SC6.22 Offsets planning scheme policy, resulting in a total offset payment of \$184,552.92 for a notional offset area of 0.7248ha.

A plan identifying the existing Biodiversity areas overlay mapping (HES/HESS) together with the extent of development footprint impacting mapped areas has also been provided (Biodiversity Areas Offset Triggers Plan). Please refer to the documentation relating to this attached as **Appendix C**.

Matter Raised:

Ecological Values

4. The site is mapped within a Koala Priority Area and Core Koala Habitat under SPP mapping, however no response to Schedule 11, Part 2, Section 4 of the Planning Regulation 2017 has been provided, and it has not been demonstrated the proposal does not constitute prohibited development.

(a) *Provide an assessment against Schedule 11, Part 2, Section 4 of the Planning Regulation 2017 by a suitably experienced and qualified ecologist.*

Response:

An assessment against Schedule 11, Part 2, Section 4 of the Planning Regulation 2017 has been prepared by New Ground Environmental Pty Ltd, a suitably experienced and qualified ecologist. The assessment finds that clearing works associated with the proposal do not encroach into mapped Koala Habitat Area (KHA), and that the development therefore does not constitute prohibited development under Schedule 10, Part 10, Division 2, Section 16A of the Planning Regulation 2017.

The assessment nonetheless addresses each of the assessment benchmarks in Schedule 11, Part 2, on a precautionary basis, and finds the proposal deemed compliant, including: the retention and rehabilitation of 3,999m² of vegetation along the eastern to north-eastern extent of the site to maintain and enhance connectivity between the on-site KHA and the KHA within Suprano Place Park to the north; management of soil, hydrology and weed impacts through an approved erosion and sediment control plan, stormwater management plan and vegetation rehabilitation; and siting of buildings, structures and works to minimise the extent of vegetation clearing required.

We are satisfied this discharges the requirement to demonstrate the proposal does not constitute prohibited development.

Matter Raised:

Verge Width

5. The Streetscape hierarchy overlay code identifies the verges adjoining the site as Neighbourhood Street Minor, which requires a minimum 3.75m wide verge. This verge width has not been achieved at the Basella and Caladium Street intersection. Further verge widening is required to achieve the required 3.75m verge width at all points.

(a) Provide amended plans, demonstrating the provision of a 3.75m verge along all frontages.

Response:

The Streetscape hierarchy overlay code identifies the verges adjoining the site as Neighbourhood street minor sub-category. Table 8.2.20.3.B of the Streetscape hierarchy overlay code requires a verge width for this sub-category of "3.75m or 4.25m for new roads." AO1 of the code requires that "Development ensures that a verge is provided via a linear land dedication to create a minimum verge width as specified in Table 8.2.20.3.B."

The subdivision plan has been amended to provide a truncation at the intersection of Basella Street and Caladium Street to achieve a 3.75m wide verge at that location, consistent with the balance of the site frontage. Please see attached as **Appendix B**.

Matter Raised:

Tree Retention

6. To ensure compliance with Council's strategic commitment to creating a green and liveable city, and Overall outcomes 3b, 4ai, 4bi and PO5/AO5.2 of the Wakerley neighbourhood plan code, as well as PO19 of the Subdivision code, the development footprint must be amended to prioritise the retention of additional vegetation. Additional retention is required where located on adjoining properties and along the southern site boundary. These trees play an important role in maintaining the established landscape character, contributing to local biodiversity, providing habitat values, and supporting urban cooling and amenity outcomes identified in Council's strategic planning framework. Several trees identified for arborist assessment are considered to be significant landscape trees and one falls under the Significant landscape tree overlay code. These trees require further investigation to confirm their retention.
 - (a) Provide a comprehensive Arborist Report, prepared by an arborist with a minimum qualification of AQF Level 5, detailing tree protection measures for all trees located along the southern boundary and on adjoining sites with recommendations on how development can proceed without compromising their health or stability.
 - (b) Provide an amended Tree Retention Plan, reflecting the retention all neighbouring trees, and all trees along the southern site boundary.
 - (c) Provide revised engineering plans clearly showing proposed works avoid intrusion into Nominal Root Zones of retained trees and all retained trees protected in accordance with the Tree Retention Plan and Arborist Report recommendations.

Response:

A comprehensive Arboricultural Impact Assessment, prepared by Arbor Australis Consulting (Project Arborist holding a minimum AQF Level 5 qualification), has been provided, together with an amended Tree Retention Plan and revised engineering plans showing the extent of Notional Root Zone encroachments and the tree protection measures required. This is enclosed within **Appendix C**.

PO19 of the Subdivision code requires that "Development ensures that the layout retains and responds to ... physical features such as topography, natural drainage systems and significant vegetation", with AO19.1 requiring retention of "significant vegetation within a park, the road reserve, waterways or corridors, common property or private open space areas." The Wakerley neighbourhood plan code likewise seeks, at Overall outcome 3(b), that land with development constraints or environmental values "are protected from inappropriate development in order to maintain its character, and natural and ecological significance", and, at Overall outcomes 4(a)(i) and 4(b)(i), very low density residential development that ensures "minimal disturbance to areas of environmental and scenic value" having regard to the site's "valuable landscape features."

Tree retention along the southern boundary has been maximised where practicable. However, selected neighbouring trees and trees along the southern site boundary are still required to be removed to facilitate construction of the cut-off drain required along that boundary to intercept and manage upstream surface water runoff, which is the drainage infrastructure Council has itself required in response to Matters 13 and 14 of this Information Request. The disturbance extent shown on the amended Tree Retention Plan represents the minimum area necessary to accommodate that required drainage infrastructure. We note that permission from the relevant adjoining landowner will be required before any tree located outside the subject site is removed, a matter outside our client's control.

Matter Raised:**Refuse**

7. The proposed subdivision has provided a 6.5m wide easement, with the driveway width less than 6.5m wide. However, in accordance with Table 11 Note. 8. of the Transport, access parking and servicing planning scheme policy (TAPS PSP), if an access driveway is trafficked by refuse vehicles, the driveway width is not to be less than 6.5m. Furthermore, it is noted that insufficient space has been provided for Lots 6 – 8 and 9, 10, 12,13, to present Mobile Garbage Bins (MGBs) along the verge of the easement, with indicative MGBs shown within the property boundary of lot 9 or having to transfer MGBs greater than 40m to kerbside by the roadside which is not functional. A 10.3m Side Loading Refuse Collection vehicle (RCV) requires a minimum 1.5m wide verge to enable for the RCV to safely and efficiently lift MGBs.
- (a) Provide amended development plans in accordance with AO4.1/PO4 of the Subdivision code, AO8.1 and AO8.2/PO8 of the Infrastructure design code, AO1/PO1 and AO19.2 and AO19.3/PO19 of the TAPS code which show that the easement has been increased to 9.5m wide to enable the construction of the required 6.5m wide driveway and 1.5m wide verge either side to facilitate functional presentation area for MGBs to be collected by the RCV.

Response:

The revised development plans demonstrate a 9.5m wide easement, comprising a 6.5m wide carriageway and a 1.5m wide verge either side for bin presentation, satisfying the requirement in Table 11, Note 8 of the Transport, access, parking and servicing planning scheme policy that "If an access driveway is trafficked by refuse vehicles, the driveway width is not to be less than 6.5m and is to be constructed to carry a nominal traffic loading of 1.5 x 10⁴ ESA."

This satisfies AO4.1 of the Subdivision code (development provides land and works for infrastructure and services in compliance with the Refuse planning scheme policy and the Transport, access, parking and servicing planning scheme policy), AO8.1 and AO8.2 of the Infrastructure design code (refuse and recycling collection and storage facilities located and designed without adverse amenity impact), and AO1, AO19.2 and AO19.3 of the Transport, access, parking and servicing code (development complies with the standards in the Transport, access, parking and servicing planning scheme policy; on-site servicing facilities and manoeuvring areas, and refuse collection service areas, designed in compliance with those standards).

A response to the traffic matters has been attached as **Appendix D**.

The proposed easement arrangement is considered acceptable.

Matter Raised:**Road Widening**

8. The development does not demonstrate compliance with required road widening and truncation for safe vehicle and pedestrian movement.
- (a) In accordance with AO1/PO1 of the TAPS code and AO3.1/PO3 of the Infrastructure design code provide amended plans that show:
- A 6m x 3m (3-chord) corner truncation at the roundabout at Basella Street and Caladium Street, ensuring adequate sight distance and vehicle movement.
 - A minimum 3.75m verge.

Response:

Road widening has been provided to address this matter. The applicable corner truncation standard is found in AO4.3 of the Subdivision code, which requires "a corner truncation of each

corner of a site with a road frontage ... a 6m long by 3 equal chord truncation if a minor road", together with AO1 of the Transport, access, parking and servicing code (development complies with the standards in the Transport, access, parking and servicing planning scheme policy). We note the Infrastructure design code does not itself contain a numbered acceptable outcome "AO3.1"; the correct benchmark for the corner truncation sought is AO4.3 of the Subdivision code, which the amended plans satisfy.

The amended plans also achieve the minimum 3.75m verge required by Table 8.2.20.3.B of the Streetscape hierarchy overlay code for the Neighbourhood street minor sub-category.

Updated traffic and civil engineering reports/plans have been attached as **Appendix D & Appendix E**.

Matter Raised:

Bus Stop

9. The existing bus stop (Stop ID 318264) must be retained and upgraded to meet Translink standards.

(a) Provide updated plans to demonstrate that the existing bus stop on Caladium Street will be:

- i. Maintained in its current location; and
- ii. Upgraded to a Translink-compliant passenger stop, assumed to be a regular stop with standard kerb and channel.

Response:

The existing bus stop (Stop ID 318264) currently comprises a J-pole and an informal passenger loading area, with no existing kerb and channel along the development frontage. As part of the proposed development works, kerb and channel will be constructed along the Caladium Street frontage, including through the extent of the existing bus stop, which will be retained in its current location.

This satisfies PO16 of the Subdivision code ("Development provides a transport network that caters for the extension of existing or future public transport routes and infrastructure including safe pedestrian set-down and pick-up facilities") and AO16 ("Development provides bus infrastructure and intersections that are designed in compliance with the Infrastructure design planning scheme policy and the Transport, access, parking and servicing planning scheme policy").

Our traffic engineer (RPEQ 22364) considers the construction of standard kerb and channel through the bus stop extent, in the context of Caladium Street's low order road classification and the sight distance available to and from the north and south, to be an acceptable upgrade.

Matter Raised:

Kerb and Channel

10)Kerb and channel works are required to be provided for both Basella Street and Caladium Streets in accordance with AO4/PO4 and AO6/PO6 of the Infrastructure design code, generally consistent with the existing alignment and maintaining the required 3.75m verge width, including areas affected by road widening near the roundabout.

Response:

The revised development plans (attached as **Appendix E**) demonstrate the provision of kerb and channel along the frontage extents of both Caladium Street and Basella Street, generally consistent with the existing alignment and maintaining the required 3.75m verge width, including in the areas affected by road widening near the roundabout.

This satisfies PO4 and AO4 of the Infrastructure design code ("Development provides verges which are designed and constructed in compliance with the road corridor design and streetscape locality advice standards in the Infrastructure design planning scheme policy") and PO6 and AO6 ("Development of an existing premises provides at the frontage of the site, if not already existing, the following infrastructure to the standard that would have applied if the development involved new premises ... concrete kerb and channel; forming and grading to verges; crossings over channels and verges ...").

Matter Raised:

Footpath

11) A continuous 1.2m wide footpath must be provided along Basella Street and Caladium Street in accordance with AO4/PO4 and AO7/PO7 of the Infrastructure design code and AO4.1, AO4.2/PO4 of the TAPS code, connecting to the existing pedestrian network.

Response:

A footpath has been provided to address this matter. The amended engineering drawings show a continuous 1.2m wide footpath along both Basella Street and Caladium Street, connecting to the *existing* pedestrian network, in accordance with PO7 and AO7 of the Infrastructure design code ("Development provides cycle and walking routes which are located, designed and constructed in compliance with the road corridor design and off-road pathway design standards in the Infrastructure design planning scheme policy") and AO4.1 and AO4.2 of the Transport, access, parking and servicing code (walking and cycle routes constructed along the full frontage of the site and connecting to existing routes at the site frontage or boundary, designed and constructed in compliance with the relevant planning scheme policy standards).

The updated plans are attached as **Appendix E**.

Matter Raised:

Driveway Locations

12) Driveway locations are not shown on the proposal plans and may impact existing infrastructure and street trees, particularly for Lots 1, 2, 3, 4, 5 and 11.

- (a) Provide amended plans showing driveway locations for these lots in accordance with AO3.1/PO3 of the TAPS code and AO4/PO4 of the Infrastructure design code and assess impacts on:
 - i. The proximity to the roundabout.
 - ii. Street trees
 - iii. Signage
 - iv. Roadside assets (e.g., drainage pits, services)
 - v. Notional MGBs presentation areas

Response:

The revised development plans nominate driveway locations for Lots 1 to 5, which front Basella Street and Caladium Street directly, and are generally in accordance with the road hierarchy standards in the planning scheme with respect to intersection separation and separation to utilities, satisfying AO3.1 and PO3 of the Transport, access, parking and servicing code (vehicle access located and designed to have no significant impact on the safety, efficiency, function or capacity of the road network) and AO4 of the Infrastructure design code (verges designed to provide safe access for pedestrians and vehicle access areas onto properties).

A Traffic Concept Plan (enclosed within **Appendix D**) has been prepared identifying the recommended bin presentation areas throughout the development, together with a Refuse

Collection Vehicle swept path assessment confirming the vehicle can safely access and manoeuvre within the site. On this basis, the proposed driveway and refuse arrangements are considered acceptable.

Matter Raised:

Filling and Excavation

13) Surface drainage and retaining wall details require further clarification. Provide amended plans in accordance with AO2.1/PO2 of the Subdivision code, AO3.1/PO3 of the Stormwater code and AO11.1/PO11 of the Flood overlay code, showing:

- (a) Finished lot levels with minimum 1:100 surface grade for drainage.
- (b) Retaining wall details where supporting road reserve, including fencing constructed concurrently with the retaining wall and also type and height of fence nominated on plans.

Response:

Concept earthworks drawings have been prepared to address this matter, in accordance with AO2.1 and PO2 of the Subdivision code (cutting, filling, retaining walls and earthworks limited in dimension and located clear of lot boundaries), AO3.1 and PO3 of the Stormwater code (stormwater drainage system contained within a road reserve, drainage reserve, public pathway, park or waterway corridor), and AO11.1 and PO11 of the Flood overlay code (access or driveway trafficable during the defined flood event and not inundated by a 10% AEP flood).

Please refer to the amended Concept Earthworks Layout Plan (Drawing 25185-SK06 Rev D) for the response to this matter – Attached as **Appendix E**.

Matter Raised:

Stormwater

14) Stormwater requirements associated with frontage works and lot drainage have not been adequately demonstrated. Provide amended plans in accordance with AO1/PO1 of the Stormwater code showing:

- (a) Stormwater drainage for all new kerb and channel works.
- (b) Limiting discharge to no more than two lots per kerb outlet.
- (c) Connecting all roof water pipes >150mm to a gully pit or maintenance hole.
- (d) Full kerb adaptors for each lot with minimum 400mm offset from the projected low-side boundary.

Response:

A Stormwater Management Plan has been prepared by HCE Engineers demonstrating compliance with PO1 and AO1 of the Stormwater code, which require "a stormwater management system which achieves the integrated management of stormwater to minimise flooding ... designed in compliance with the Infrastructure design planning scheme policy." The report demonstrates that surface flow from land to the south is managed via boundary cut-off drains sized to convey the 2% AEP design event, that major storm flows within the internal driveway remain within safe limits (velocity-depth product under 0.3m²/s), and that a lawful point of discharge is achieved via the existing culvert headwall in Basella Street.

Please refer to the amended Concept Roadworks and Drainage Layout Plan (Drawing 25185-SK02 Rev C) for the specific kerb and channel drainage connections, kerb outlet arrangements and kerb adaptor details sought by Council – Attached as **Appendix F**.

In support of the proposed amendments, a response to the RFI from the civil engineer has also been attached as **Appendix G**.

As per section 13.2 of the DA Rules, this letter provides a response to:

- a) all of the information requested; or
- b) ~~part of the information requested; or~~
- c) ~~a notice that none of the information will be provided.~~

We will now progress with public consultation accordingly.

Should Council have any outstanding issues associated with the information provided within this report, we formally request that Council informs us prior to making a decision.

Kind regards,



Alexander Steffan | Director

Steffan Harries

Email: alex@steffanharries.au