

Hi there

Subject: Opposed to Approval 51 Crossacres Street, Doolandella QLD 4077 Lot 34 on RP90234 | DA A006651694

Unfortunately your online portal was unable to assist lodging this submission. See below screenshot from URL.

Please find attached submission in opposition to the current proposal.

[\[..\]](#)

Please ensure this is received and applied to the site accordingly before the submission deadline of 27 August 2026.

Thank you.

Cheers

FORMAL OBJECTION

Submission — Opposed to Approval

51 Crossacres Street, Doolandella QLD 4077

Lot 34 on RP90234 | DA A006651694

Applicant:	Loc Phat Pty Ltd
Planning Consultant:	Willowtree Planning
Engineering Consultant:	vT Consulting Engineers (Doc. 24309-ENG-C, Rev. C)
Traffic Consultant:	Modus Transport and Traffic Engineering (12 May 2025)
Local Government:	Brisbane City Council — Development Services
Submitted to:	DSPlanningSupport@brisbane.qld.gov.au
Date:	21 August 2026

EXECUTIVE SUMMARY

This document constitutes a formal, consolidated objection to Development Application A006651694 — the proposed reconfiguration of Lot 34 on RP90234 at 51 Crossacres Street, Doolandella from one lot into twenty-three (23) residential lots. The objection is submitted to Brisbane City Council and incorporates concerns spanning ecology, engineering infrastructure, traffic and transport, and fire safety.

The proposed development, as submitted, fails to satisfy the legislative and planning scheme requirements of Brisbane City Council and the Queensland Government across six distinct domains:

1. Environmental and ecological destruction — the complete removal of approximately 289 trees, including 3,935 m² of Endangered Remnant Vegetation (Regional Ecosystem 12.2.3a) and Core Koala Habitat Area, without any avoidance or retention option being investigated;
2. Absence of green space and community amenity — no communal open space, no landscape plan, and an 18-fold increase in impervious surface coverage;
3. Inadequate parking — no visitor parking provision and no allowance for households with three or more vehicles, typical in outer-suburban Brisbane;

4. Engineering deficiencies — over-reliance on undersized private stormwater infrastructure, a burden-shifting sewer pump design, and unresolved factual errors in the submitted documentation;
5. Inadequate traffic assessment — NSW-sourced trip generation rates underestimate Brisbane suburban vehicle demand, no existing traffic count on Crossacres Street (a District Road / Major Road) has been conducted, and non-peak trip impacts are entirely unaddressed;
6. Fire safety deficiency — the proposed development does not demonstrate compliance with AO23.1 of the BCC Infrastructure Design Code, which requires fire hydrants at not more than 90-metre intervals on private roads. The 150m+ internal road serves all 23 lots from a single Crossacres Street access point, yet no internal hydrants are proposed.

This submission requests that Brisbane City Council refuse the application as submitted and require the applicant to redesign the development with substantially fewer lots to allow retention of protected remnant vegetation, provision of communal green space, adequate visitor parking, and compliant fire safety infrastructure.

Contents

1. Development Overview	4
2. Ecological Impact — Wholesale Clearing of Protected Native Vegetation	4
2.1 Scale and Completeness of Proposed Clearing	4
2.2 Destruction of Endangered Remnant Vegetation and Core Koala Habitat	4
2.3 Hollow-Bearing Trees, Stag Trees, and Protected Fauna	5
2.4 NJKHT Classification — Methodological Concerns	6
2.5 Tree Species Count	6
2.6 Applicable Legislation	6
3. Absence of Green Space and Community Amenity	7
4. Inadequate Visitor Parking and Vehicle Access	8
4.1 No Dedicated Visitor Parking	8
4.2 Households with Three or More Vehicles	8
5. Bin Storage and Collection — Unreasonable Assumptions	8
6. Stormwater Drainage — Over-Reliance on Neighbouring Private Infrastructure	9
6.1 Dependency on 375mm Pipe in Private Land and Basin Next Door	9
6.2 Address Error — 43 vs 53 Crossacres Street	10
6.3 Lot Count Discrepancy	11
7. Sewer Reticulation — Private Pump Station: Ongoing Cost Burden	11
8. Traffic Impact Assessment — Methodological Deficiencies	11
8.1 Inappropriate Trip Generation Rates — NSW Data Applied to Brisbane	11

8.2 No Existing Traffic Count on Crossacres Street	12
There are already three nearby residential estates with 24 or more dwellings relying on access to Crossacres Street, including estates associated with 43 Crossacres Street, 53 Crossacres Street and Avington Street. Residents report that entering and exiting these streets is already difficult during peak periods, particularly for right-turn movements. The combination of the divided carriageway, nearby traffic island and increasing traffic from childcare, fuel, fast food and supermarket uses has created frequent queueing and unsafe manoeuvres to overtake via the swale embankment, including vehicles swerving around turning traffic and drivers undertaking U-turns between the 43 and 53 Crossacres Street access points.....	
8.3 No Daily or Non-Peak Hour Analysis	13
8.4 Single Access Point — Safety and Capacity	13
9. Fire Hydrant Adequacy — Compliance with BCC Infrastructure Design Code.....	13
9.1 The Code Requirement	13
9.2 Current Engineering Report Position	13
9.3 Compound Risk — Single Access, No Internal Hydrant, Dense Subdivision.....	14
9.4 Requested Outcomes — Fire Safety	15
10. Request for Reconsideration — A Better Development Outcome.....	15
10.1 The Case for Fewer Lots	15
10.2 What a Redesigned Development Could Achieve.....	16
10.3 Council's Obligations Under the Planning Framework	16
11. Consolidated Summary — Objections and Requested Outcomes	17
12. Conclusion	18
References	20

1. Development Overview

The subject site at 51 Crossacres Street, Doolandella QLD 4077 (Lot 34 on RP90234) is a 10,162 m² parcel situated approximately 16.5 kilometres south-west of the Brisbane CBD. It is currently occupied by a single detached dwelling and extensive native vegetation, including a mapped Core Koala Habitat Area (KHA) of 3,935 m² in the site's northern portion, inclusive of a High Ecological significance biodiversity overlay.

Development Application A006651694 (lodged 11 December 2024) seeks to reconfigure this single lot into twenty-three (23) residential lots ranging in area from 306 m² to 465 m². The application is supported by and not limited to a Tree Retention and Removal Plan (TRRP) ^[1] prepared by Willowtree Planning/Wolter Consulting Group (TRRP-01 to TRRP-10, Version B, 24 April 2025); an Engineering Report and Stormwater Management Plan ^[2] prepared by vT Consulting Engineers (Doc. 24309-ENG-C, Rev. C, 30 July 2026); and a Traffic Engineering Report ^[3] prepared by Modus Transport and Traffic Engineering (12 May 2025). Further Potential Site Configuration^[4] options were provided by Threfor Group for Willowtree Planning Site Options, (10 November 2025).

Brisbane City Council issued an Information Request (IR) on 11 December 2024 identifying significant concerns regarding ecological values, bushfire risk, lot sizes, traffic, and stormwater. The applicant's responses to the IR items — including the TRRP, Engineering Report, and Traffic Report — are the subject of this objection.

2. Ecological Impact — Wholesale Clearing of Protected Native Vegetation

2.1 Scale and Completeness of Proposed Clearing

The TRRP (Drawing Nos. TRRP-01 to TRRP-10) proposes the removal of every single tree on the site — a total of approximately 289 individually numbered trees (TR-001 to TR-291) ^[1]. Not a single tree has been designated for retention. This represents an extraordinary outcome for a 1.01-hectare site of demonstrably high ecological significance.

The site contains a rich diversity of native species, including recognised koala food trees — *Corymbia intermedia* (Pink Bloodwood), *Eucalyptus siderophloia* (Northern Grey Ironbark), *Lophostemon suaveolens* (Swamp Box), *Eucalyptus seeana* (Narrow-leaved Red Gum), *Corymbia citriodora* (Spotted Gum), and *Eucalyptus microcorys* (Tallowwood) — as well as large-girthed specimens (up to 900 mm DBH for TR-238) and trees with confirmed hollow features and stick nests. The complete removal of all vegetation, without any attempt at retention, is inconsistent with the mitigation hierarchy (avoid → mitigate → offset) required under applicable legislation.

2.2 Destruction of Endangered Remnant Vegetation and Core Koala Habitat

A 3,935 m² polygon of Core Koala Habitat Area (KHA) in the northern portion of the site is classified as Endangered Remnant Vegetation corresponding to Regional Ecosystem 12.2.3a — a *Corymbia intermedia* and *Eucalyptus siderophloia* dominant eucalyptus woodland community listed as Endangered under the Vegetation Management Act 1999 (Qld) and supporting habitat for the koala (*Phascolarctos cinereus*), which is listed as Endangered under the Environment Protection and Biodiversity Conservation Act 1999 (Cth).

The Koala Management Plan (KMP) prepared pursuant to SDAP State Code 25 acknowledges that the KHA impact is assessed as HIGH risk (likelihood: Almost Certain; consequence: Moderate to Major). Despite this, the KMP proposes no avoidance option — the clearing is to proceed with only a Fauna Spotter Catcher present. No alternative subdivision layout retaining any portion of the KHA is presented or assessed. Previous Site options did provide alternatives which have been ignored. There is no plan for or mention of what a fauna spotter will do with all other species disturbed during the destructive clearing. The proposal therefore relies on offset payment rather than avoidance or meaningful on-site retention, which is inconsistent with the mitigation hierarchy expected for land containing endangered remnant vegetation, protected native species, and Core Koala Habitat Area.

⚠ Objection: No Avoidance Option Investigated for Endangered Remnant Vegetation

The KMP does not demonstrate that alternative subdivision layouts retaining any portion of the 3,935 m² Core KHA were properly considered in latest proposal. The mitigation hierarchy under the Nature Conservation Act 1992 (Qld) and the EPBC Act 1999 (Cth) requires avoidance as the first-priority measure before mitigation or offset.

Low koala SAT scores (0.00 scats per plot) cannot override the verified habitat value of the vegetation. The absence of scats does not equate to the absence of koalas in the broader movement area.

The destruction of 3,935 m² of Endangered Remnant Vegetation for a residential subdivision of this density and lot size does not satisfy the ecological justification threshold required under Queensland or Commonwealth law.

2.3 Hollow-Bearing Trees, Stag Trees, and Protected Fauna

The tree catalogue identifies numerous trees with confirmed hollows and approximately 18 stag (dead standing) trees. Hollow-bearing trees and stags provide critical nesting and roosting habitat for hollow-dependent fauna protected under Queensland and Commonwealth law, including microbats, possums, gliders, and hollow-nesting birds. Selected examples include:

- TR-016 (*Eucalyptus microrys*, Tallow wood): Hollow present — REMOVE
- TR-040 (*Lophostemon suaveolens*, Swamp box): Stick nest recorded — REMOVE
- TR-128 (Stag): Hollows confirmed — REMOVE
- TR-129 (*Corymbia intermedia*, 450 mm DBH): Termites and hollows confirmed, NJKHT — REMOVE

- TR-182 (*Corymbia intermedia*, 400 mm DBH): Termites confirmed, NJKHT — REMOVE

The removal of hollow-bearing trees without independent pre-clearing survey for hollow-dependent fauna is inconsistent with the Natural Assets Local Law 2003 (NALL) and may constitute an offence under the Nature Conservation Act 1992 (Qld) if protected fauna are displaced, injured, or killed without proper authorisation.

2.4 NJKHT Classification — Methodological Concerns

The notation "NJKHT" (Not a Juvenile Koala Habitat Tree) is applied broadly throughout the catalogue to *Corymbia intermedia*, *Eucalyptus siderophloia*, *Eucalyptus seeana*, and *Corymbia citriodora* — species that are recognised koala food trees — including specimens up to 900 mm DBH and 18 metres in height. The application of the NJKHT classification to trees of this size and maturity is a matter of significant concern that should be independently verified before any clearing is authorised.

2.5 Tree Species Count

The following table summarises the species identified in the TRRP catalogue (Drawing Nos. TRRP-06 to TRRP-10). All trees are marked for removal. The catalogue identifies approximately 20 species across ~289 individual trees, approximately 65% of which are native to South East Queensland.

Species	Common Name	Count (approx.)	Native	Koala Food Tree
<i>Corymbia intermedia</i>	Pink Bloodwood	87	Yes	Yes
<i>Artocarpus heterophyllus</i>	Jackfruit	49	No (exotic)	No
<i>Lophostemon suaveolens</i>	Swamp Box	52	Yes	Yes
<i>Eucalyptus siderophloia</i>	Northern Grey Ironbark	25	Yes	Yes
<i>Eucalyptus seeana</i>	Narrow-leaved Red Gum	18	Yes	Yes
<i>Corymbia citriodora</i>	Spotted Gum	12	Yes	Yes
<i>Eucalyptus microcorys</i>	Tallowwood	11	Yes	Yes
<i>Spathodea campanulata</i>	African Tulip Tree (invasive)	4	No (invasive)	No
<i>Allocasuarina torulosa</i>	Rose Sheoak	8	Yes	No
Other species (misc.)	Various	~23	Mixed	Mixed

Table 2-1: Approximate Tree Species Count — All 289 Trees Marked for Removal (TRRP-06 to TRRP-10)

2.6 Applicable Legislation

The following legislative instruments are directly engaged by the proposed wholesale vegetation clearing:

- Environment Protection and Biodiversity Conservation Act 1999 (Cth) — koala listed as Endangered and other threatened or protected species listed; EPBC referral obligations may be triggered by a significant impact on listed species
- Nature Conservation Act 1992 (Qld) and Nature Conservation (Koala) Conservation Plan 2017 — Koala Habitat Protection obligations along with all native mammals, birds, reptiles, and amphibians
- Vegetation Management Act 1999 (Qld) — RE 12.2.3a is Endangered; clearing permits required and avoidance obligations apply
- Planning Act 2016 (Qld) — State Development Assessment Provisions (SDAP) State Code 25 (Koala)
- Brisbane City Plan 2014 — Biodiversity Areas Overlay Code (High Ecological Significance/HESS), Significant Landscape Tree Overlay Code, Natural Assets Local Law 2003 (NALL)
- Biosecurity Act 2014 (Qld) — *Spathodea campanulata* (African Tulip Tree, 4 specimens) is a declared pest plant; its removal must not seed or spread to adjacent land

3. Absence of Green Space and Community Amenity

The Engineering Report ^[2] confirms that the entire site will be cleared ('Site to be cleared in preparation for building construction. All existing structures to be demolished and removed') and no provision is made for communal open space, landscaped corridors, street trees, or pocket parks within the subdivision layout.

The proposed development involves the replacement of 1.01 hectares of dense native canopy with 23 impervious-heavy residential lots, a sealed internal road, rooftops, and driveways. The fraction of impervious surface rises from 0.03 (3%) in the pre-development condition to 0.53 (53%) post-development — an 18-fold increase that will materially worsen the urban heat island effect, increase surface stormwater runoff, and eliminate every ecological and amenity function previously provided by the vegetation.

With lot sizes of 306 m² to 465 m², house footprints combined with garages and driveways will leave minimal private garden area per lot. The development provides no shared park, pocket garden, or tree-lined corridor. No revegetation, tree replacement, or landscaping plan is included in the submitted documentation.

The applicant's response does not adequately address Council's concern that the proposed lot sizes and average yield of approximately 320 m² per lot substantially exceed the expected dwelling density of 12 dwellings per hectare for a site within the Low density residential category of the Doolandella neighbourhood plan code.

△ Request for Reconsideration — Green Space

Council is requested to require the applicant to redesign the subdivision with fewer lots to allow: (a) a minimum communal open space or green corridor of no less than 5% of net site area; (b) a landscape and revegetation plan prepared by a qualified landscape architect, using endemic species consistent with the former KHA vegetation; and (c) street tree planting along the full Crossacres Street frontage.

Reduction from 23 lots to approximately 13–15 lots would allow meaningful green space retention and protection of the Endangered Remnant Vegetation community in the northern portion of the site, while still delivering a viable residential subdivision yield.

4. Inadequate Visitor Parking and Vehicle Access

4.1 No Dedicated Visitor Parking

No visitor parking spaces have been designed, allocated, or shown within the subdivision layout. With 23 residential lots accessing a single 10-metre-wide shared internal road, the demand for visitor parking will be significant and wholly unaddressed. Crossacres Street in this location does not have formal on-street parking embayment's or wide shoulders. The sole Type B2 crossover and shared access road cannot accommodate parking without blocking the driveway access for residents.

4.2 Households with Three or More Vehicles

The proposal does not address households with three or more registered vehicles — a growing reality in outer-suburban Brisbane where a household may operate two family cars plus a tradesperson's vehicle, boat, work van, or camper trailer. Lots of 284 m² to 465 m² with small setbacks provide no space for overflow parking beyond a single-width driveway. Garage misuse for storage rather than vehicle parking is common in South East Queensland and is not accounted for in the parking analysis.

Council is requested to require a minimum of one dedicated visitor parking space per five lots (five bays minimum) within the development, and to condition any approval on an enforceable Body Corporate By-law prohibiting obstructive parking within the shared access road.

5. Bin Storage and Collection — Unreasonable Assumptions

With 23 households each generating up to potentially three wheelie bins (general waste, recycling, and organics), a maximum of 46 bins must be staged in front of homes along the proposed new road on collection day. The submitted layout does not provide dedicated bin staging areas or bin storage alcoves within common land, meaning bins would need to be stored within individual allotments and presented along the internal road frontage.

Any approval should require Body Corporate by-laws that clearly regulate bin storage and collection-day presentation, including requirements that bins be stored behind the lot frontage when not awaiting collection and that bins do not obstruct the internal road, driveways or pedestrian movement.

The proposal appears to rely on lots 10 and 13 using the frontage of neighbouring lots 11 and 12 for bin presentation so that the refuse collection vehicle can service bins around the tight T-bend configuration. That arrangement assumes ongoing cooperation between future private owners and may create avoidable conflict. It is also unclear whether lots 10 and 13 would be expected to place bins on the road, common property or another resident's private frontage.

6. Stormwater Drainage — Over-Reliance on Neighbouring Private Infrastructure

6.1 Dependency on 375mm Pipe in Private Land and Basin Next Door

The primary Legal Point of Discharge (LPOD) relies on an existing 375mm diameter stormwater pipe within private land at 17 Wombat Place ^[2]. This pipe is not owned or controlled by the proponent or Council, and the private landowner has no obligation to maintain it to a standard adequate for the substantially increased post-development flows from a 23-lot subdivision.

Post-development peak flows increase from negligible pre-development levels to a 100-year peak of up to 376 litres per second before detention mitigation. Even after the 172 m³ underground detention tank, mitigated 100-year peak flows of approximately 331 l/s are proposed to discharge through or adjacent to this private pipe. No pipe condition assessment of the 375mm asset is presented.

There is also no adequate assessment of overflow behaviour during extreme rainfall events. Adjoining developments at 53 Crossacres Street to the north and 43 Crossacres Street to the east appear to have stormwater systems designed for their own development footprints, not for additional unmanaged overflow from a further 23-lot subdivision.

The drainage easement of lot 53 leading into the LPOD on 17 Wombat is not adequately designed to bear overflow of another 23 lots increase on impervious surface coverage. Any overflow of the drainage easement on lot 53 boundary will overflow into the new homes built there. There is already visual evidence that new homeowners/residents in this estate are building over this uncovered drainage to increase their back yard foot print.

The retention basin and pump station of lot 43 cannot bear any more overflow from neighbouring properties. Recent extreme weather events in the last 4 years have tested the design of lot 43 . In February 2022 the whole catchment became full due to extreme rainfall which restricted stormwater outflow abilities in the current council pipeline to nearby catchment outlets. The result was expensive for each lot owner due to pump system failure under extreme pressure resulting in overflow water to the lot behind, resulting in a following complaint from that owner to council on a later date. See image 1.

Image 1

Future problems are inevitable if not addressed in the planning proposals and urban utilities conditions.

6.2 Address Error — 43 vs 53 Crossacres Street

⚠ Factual Error in Engineering Report

Section 5C of the Engineering Report references Council Application A006134302 at "43 Crossacres Street" as a stormwater receptor. The correct address is 53 Crossacres Street — the northern adjoining property (Lot 25 on RP90234). The stormwater discharge pathway traverses the 53 Crossacres Street lot via drainage easement. No evidence is provided if this easement is adequate for additional waterflow in extreme events.

43 Crossacres next door to the east are equally concerned about overflow in extreme events as they are completely reliant on a detention basin and pump system to push water to a distant legal point of discharge.

This error affects the legal validity of the stormwater easement arrangements. Council is requested to require the applicant to formally correct the engineering report and confirm the correct property title against which stormwater easements are registered before approving any earthworks or connection works.

6.3 Lot Count Discrepancy

⚠ Factual Error: Engineering Calculations May Not Reflect Final 23-Lot Yield

Earlier planning documents referenced a 22-lot proposal. The Engineering Report Introduction states 23 lots. Council is requested to require the engineer of record (RPEQ A. van Tonder, RPEQ 16132) to certify in writing that all technical calculations — stormwater detention sizing (172 m³), MUSIC model inputs, sewer pump capacity — reflect the final 23-lot configuration.

7. Sewer Reticulation — Private Pump Station: Ongoing Cost Burden

The Engineering Report proposes a private sewer pump station and rising main discharging to the Council gravity sewer main on Crossacres Street. Proposed plans submitted do not show any allowance on common land for the relevant pump station and electrical points to reside.

Private pump stations in this configuration can create recurring maintenance, blockage and odour risks at the gravity sewer connection, with costs borne by the Body Corporate and future homeowners.

This design imposes an ongoing maintenance liability on 23 households — including emergency pump-out, and sewage overflow risk at the Council gravity connection. Council is requested to require the applicant to investigate and demonstrate that a gravity sewer solution or alternative connection point has been genuinely investigated before approving the pump station design. Neighbouring 43 Crossacres Street is a testament to the ongoing cost burden to lot owners due to a similar design catering for 24 lots or a larger footprint.

8. Traffic Impact Assessment — Methodological Deficiencies

8.1 Inappropriate Trip Generation Rates — NSW Data Applied to Brisbane

The Modus Traffic Engineering Report ^[3] adopts trip generation rates from the NSW Guide to Traffic Impact Assessment (NSW GTIA) — a New South Wales document — to calculate peak hour vehicle generation for the proposed 23-lot Brisbane suburban subdivision. The adopted rates are 0.68 vph per lot (AM peak) and 0.77 vph per lot (PM peak), producing a calculated total of 16 trips AM and 18 trips PM.

These NSW-sourced rates are not appropriate for the outer-suburban Brisbane context of Doolandella, which is characterised by high car dependency, limited public transport frequency, and no railway access within practical walking distance. Queensland-specific and national guidance consistently yields higher residential trip generation rates in the range of 0.9–1.2 vph per dwelling during peak hours.

Rate Source	PM Rate (vph/lot)	PM Total (23 lots)	Exceeds 25 vph threshold?
NSW GTIA (Modus adopted)	0.77	18 trips	No
Conservative QLD estimate	0.90	21 trips	No
Moderate QLD estimate	1.00	23 trips	No
Δ Realistic QLD (1.1 vph)	1.10	Δ 26 trips	Δ YES — full TIA required
Δ Higher QLD (1.2 vph)	1.20	Δ 28 trips	Δ YES — full TIA required

Table 8-1: Trip Generation Sensitivity Analysis — Effect of Queensland-Calibrated Rates

At Queensland-calibrated rates of 1.1 vph per dwelling, the development generates 26 PM peak trips — exceeding the 25 vph "major development" threshold that triggers a requirement for a full Traffic Impact Assessment (TIA) under AO2 of the BCC Road Hierarchy Overlay Code. The 7-trip margin between the reported 18 vph and the 25 vph threshold is not sufficient justification to proceed without a comprehensive assessment.

Residents are already feeling the impact of new estates reliant on Crossacres Street entrance particularly since the new Woolworths development opened recently increasing traffic and pedestrian flow.

8.2 No Existing Traffic Count on Crossacres Street

Crossacres Street is classified as a District Road (Major Road) carrying considerable existing traffic from multiple residential precincts. The Modus Traffic Engineering Report does not include a single traffic count — manual or automatic — on Crossacres Street. There is no baseline volume data, no average annual daily traffic figure, and no level of service analysis. The conclusion that the development will have "negligible impact" on the road network is entirely unsubstantiated without knowledge of existing traffic conditions.

Council's own road widening plan (RC16163 Issue 1) requires a 10-metre road resumption from the development site — an implicit acknowledgement that Crossacres Street already faces capacity pressure and requires future widening. Adding 23 dwellings through a single access point without a baseline count is an unacceptable approach for a District Road classification.

There are already three nearby residential estates with 24 or more dwellings relying on access to Crossacres Street, including estates associated with 43 Crossacres Street, 53 Crossacres Street and Avington Street. Residents report that entering and exiting these streets is already difficult during peak periods, particularly for right-turn movements. The combination of the divided carriageway, nearby traffic island and increasing traffic from childcare, fuel, fast food and supermarket uses has created frequent queueing and unsafe manoeuvres to overtake via

the swale embankment, including vehicles swerving around turning traffic and drivers undertaking U-turns between the 43 and 53 Crossacres Street access points.

8.3 No Daily or Non-Peak Hour Analysis

The Modus report assesses only AM and PM peak hours. A 23-lot development is estimated to generate approximately 184–230 daily vehicle trips (368–460 one-way movements per day) through the single shared access point. This sustained daily load — including school run peaks, deliveries, tradesperson visits, and recreational trips — is entirely absent from the traffic assessment.

8.4 Single Access Point — Safety and Capacity

All 23 lots access Crossacres Street through a single 7-metre crossover. There is no right-turn deceleration lane, no traffic signal, and no queue or delay analysis for vehicles waiting to enter or exit the development. All emergency vehicles, waste collection vehicles, and daily vehicle movements for 23 dwellings are funnelled through this single point. Council should require a warrant assessment for auxiliary turn treatment and an assessment of whether a second emergency access is feasible.

9. Fire Hydrant Adequacy — Compliance with BCC Infrastructure Design Code

9.1 The Code Requirement

Performance Outcome 23 (PO23) and Acceptable Outcome 23.1 (AO23.1) of the BCC Infrastructure Design Code (Table 9.4.4.3.A) require that development, where involving premises accessed by common private title, must provide fire hydrants as follows:

- Above or below ground fire hydrants are provided on residential, commercial, and industrial streets and private roads, at not more than 90-metre intervals;
- Hydrants must be provided at each street intersection;
- Hydrants must be identified by raised reflectorised pavement markers (RRPM) on sealed roads (AO23.2).

Performance Outcome 24 (PO24) and AO24 further require that internal private roads have a minimum roadway clearance of 3.5 metres wide and 4.8 metres high for refuse and emergency vehicles to gain access to a safe working area close to buildings and near water supplies, whether or not on-street parking spaces are occupied.

9.2 Current Engineering Report Position

Section 8 (Water Reticulation) of the Engineering Report ^[2] states: "A new connection will be established for the proposed development site from the existing water main along Crossacres Street. Two hydrants exist on Crossacres Street to service the proposed development." The report

notes that the proposed fire and water meter service is to be sized by hydraulic engineers at detail design stage.

Critically, the Engineering Report does not propose any internal fire hydrants within the private 10-metre-wide road serving the 23-lot development. The report relies entirely on two existing fire hydrants on Crosssacres Street as the sole fire-fighting water supply for the development.

⚠ Critical Deficiency — Internal Fire Hydrants Not Provided

The BCC Infrastructure Design Code AO23.1 requires fire hydrants at not more than 90-metre intervals on private roads. The internal private road serving the 23-lot development is approximately 150 metres in length — measured from the Crossacres Street access point to the T-head turning area at the end of the road.

The two existing hydrants referenced in the Engineering Report are located on Crossacres Street — outside the development. They are not on the private internal road. Dwellings near the T-head end of the internal road are estimated to be 120–150 metres from the nearest Crossacres Street hydrant, substantially exceeding the 90-metre maximum spacing required by AO23.1.

In a fire emergency, Queensland Fire Department (QFD) appliances require a hydrant within 90 metres of the building to connect hoses safely. Lots at the far end of the internal road — potentially 12 or more of the 23 proposed lots — would not have adequate hydrant access in a structure fire scenario.

No QFD referral advice or fire hydrant compliance assessment is presented in the application. The statement that hydraulic engineers will "size" the service at detail design does not address whether internal hydrants will be installed within the private road at compliant intervals.

9.3 Compound Risk — Single Access, No Internal Hydrant, Dense Subdivision

The fire safety risk is compounded by several concurrent factors in this development:

- Single access point — all fire appliances must enter and exit via the single 7-metre Crossacres Street crossover. Any vehicle obstruction or incident at the crossover during a fire emergency could block appliance access to all 23 lots.
- Narrow internal road — the proposed revised 6.5-metre carriageway (within a 10-metre reserve) allows two-way traffic but leaves minimal clearance for a fire appliance to pass a parked vehicle. Given the absence of visitor parking provision, vehicles may park in the internal road, reducing effective width below the 3.5-metre AO24 clearance requirement.
- No secondary or emergency access — there is no alternative vehicle access to the development in the event of a blockage at the Crossacres Street entry.

- 23 lots served by a single T-head road — all dwellings are dependent on a single internal road for both access and fire-fighting water supply. The compound effect of no internal hydrant, single access, and restricted carriageway width represents an unacceptable fire safety risk.

9.4 Requested Outcomes — Fire Safety

Council is requested to:

- Require the applicant to provide a fire hydrant compliance assessment prepared by a hydraulic engineer endorsed by a Registered Professional Engineer of Queensland (RPEQ), demonstrating compliance with AO23.1 (hydrants at ≤90m intervals on the private road), before any development approval is issued.
- Require at least one internal fire hydrant to be installed within the private road at a location that places all dwellings within 90 metres of a hydrant, consistent with AO23.1.
- Require a Queensland Fire Department (QFD) referral or pre-lodgement consultation for fire access and hydrant adequacy, given the single-access cul-de-sac design serving 23 dwellings.
- Condition any approval on a minimum unobstructed roadway clearance of 3.5 metres width and 4.8 metres height throughout the internal road at all times, enforced through Body Corporate By-laws, consistent with AO24.

10. Request for Reconsideration — A Better Development Outcome

10.1 The Case for Fewer Lots

The cumulative weight of the objections raised in this submission — ecological, engineering, traffic, amenity, and fire safety — points to a development that has been designed to maximise lot yield without adequate regard for the constraints and character of the site. The proposed 23-lot yield, on a 1.01-hectare site containing Endangered Remnant Vegetation, a Core Koala Habitat Area, and a single access point on a District Road, is inconsistent with the site's intrinsic limitations and the planning framework's own performance outcomes.

Brisbane City Council's own Information Request (IR) noted: "The current layout provides a minimum average lot size of approximately 320 m² and a development yield that far exceeds the expected dwelling density of 12 dwellings per hectare for a site within the Low density residential category of a potential development area in the Doolandella neighbourhood plan code."

A density of 12 dwellings per hectare on a 1.01-hectare site produces a yield of approximately 12 dwellings. The current 23-lot proposal is nearly double this benchmark. Even if allowance is made for site-specific characteristics and infrastructure provision, a yield in the range of 12–15 lots would appear far more consistent with the neighbourhood plan density expectation.

Scenario	Lots	Avg. Lot Size	KHA Retention	Green Space	Visitor Parking	Traffic (PM peak est.)
Current Proposal	23	~345 m ²	X None	X None	X None	~18–26 vph
Neighbourhood Plan Target	~12	~600 m ²	✓ Possible	✓ Feasible	✓ Feasible	~10–14 vph
Compromise Redesign	~15	~480 m ²	✓ Partial	✓ Achievable	✓ Achievable	~12–17 vph

Table 10-1: Comparative Scenario Analysis — Lot Yield vs. Site Constraints

10.2 What a Redesigned Development Could Achieve

A redesigned development with approximately 12–15 lots could credibly achieve:

- Retention of the 3,935 m² Core Koala Habitat Area in the northern portion of the site as a communal green open space or conservation lot, satisfying the Biodiversity Areas Overlay Code PO4 requirement for protection and conservation of HES values;
- Lot sizes of 450–600 m² consistent with the Low Density Residential zone's expected character and the Doolandella Neighbourhood Plan density benchmark of 12 dwellings per hectare;
- Visitor parking integrated within the internal road layout at a ratio of one bay per five lots, without compromising access widths or carriageway clearance;
- At least one internal fire hydrant within the private road at a compliant 90-metre spacing from the Crossacres Street hydrants;
- Reduced traffic generation below 15 PM peak vph — well within the 25 vph major development threshold — reducing the traffic impact on Crossacres Street and potentially enabling a desktop review to suffice without a full TIA;
- A gravity sewer connection rather than a private pump station, given the reduced lot yield and potential for alternative sewer routing;
- A compliant and manageable stormwater detention strategy without full reliance on 375mm private infrastructure over a block away after passing through neighbouring lot 53 land owners easement.

10.3 Council's Obligations Under the Planning Framework

Under the Planning Act 2016 (Qld) and the City Plan 2014, Council is obligated to assess development applications against applicable codes and to impose conditions or refuse applications that do not demonstrate compliance. The following performance outcomes are directly at issue:

- Biodiversity Areas Overlay Code PO4 — protection, conservation, and restoration of HES values. Clearing all 289 trees including Endangered Remnant Vegetation and Core KHA cannot satisfy this outcome;
- Doolandella Neighbourhood Plan Code — expected dwelling density of 12 dwellings per hectare in the Low Density Residential category of a potential development area;

- TAPS PSP AO1/PO1 — traffic and access arrangements must not compromise road safety and efficiency. A single access on a District Road without queue analysis or turn treatment does not demonstrate compliance;
- Infrastructure Design Code PO23/AO23.1 — fire hydrants at ≤90m intervals on private roads. Not demonstrated in the application;
- Open Space Code — provision of open space commensurate with the scale of development. Zero open space for 23 lots does not satisfy this intent;

11. Consolidated Summary — Objections and Requested Outcomes

#	Objection	Key Deficiency	Requested Council Action
1	Complete tree removal — 289 trees including Endangered RE 12.2.3a	No avoidance option for Core KHA; EPBC/NCA/VMA obligations not met	Require independent ecological review; refuse TRRP as submitted. Ensure a significant portion of trees are retained.
2	No green space or open space	Zero communal area; 18× increase in impervious surface; no landscape plan	Require minimum % retention of biodiverse habitat, 5% communal open space and revegetation plan
3	No visitor parking; no multi-vehicle household provision	No visitor bays in 23-lot development; single-access 10m road	Require 1 visitor bay per 5 lots; Body Corporate parking by-law
4	Bin storage burden on neighbouring properties	Lots 10 and 13 have to rely on good will of neighbours front verge	Require dedicated bin staging area on common land to diffuse any potential conflict on private land
5	Stormwater: reliance on 375mm private pipe at 17 Wombat Place and private detention basin at 43	Private pipe not controlled by proponent; no condition assessment Overflow impacts east and west when deficient 43 cannot cope with additional overflow	Require pipe condition assessment and easement verification Check extreme overflow impact to adjoining properties of all boundaries
6	Engineering report: address error (43 vs 53 Crossacres)	Stormwater easement recorded against wrong property address	Require formal correction and title verification before approval
7	Engineering report: lot count discrepancy (22 vs 23)	Engineering calculations may not reflect final 23-lot yield	Require RPEQ written certification of 23-lot compliance

8	Sewer: private pump station — cost burden on homeowners	Annual blocking at gravity connection; no gravity alternative investigated	Require gravity alternative assessment before pump station approved
9	Traffic: NSW GTIA rates underestimate Brisbane demand	18 vph reported vs 25 vph threshold; Queensland rates yield 23–28 vph	Require Queensland-calibrated TIA with local trip generation validation
10	Traffic: no existing count on Crossacres Street (District Road)	"Negligible impact" conclusion unsubstantiated without baseline data	Require 48-hour ATC and turning movement counts on Crossacres Street
11	Traffic: no daily or non-peak trip analysis	~369–460 daily movements through single access unassessed	Require daily trip, inter-peak, school run, and construction traffic analysis
12	Traffic: single access, no turn treatment or queue analysis	No right-turn lane, no signal, no intersection capacity assessment	Require auxiliary turn warrant assessment for Crossacres Street access
13	⚠ FIRE SAFETY: no internal hydrants on 150m private road	AO23.1 requires hydrants at ≤90m intervals; furthest lots ~150m from Crossacres hydrant	Require RPEQ hydraulic report; internal hydrant at ≤90m; QFD referral
14	Overall: excessive lot yield for constrained site	23 lots is ~double the 12 dwellings/hectare NP benchmark density	Require redesign to ~12–15 lots retaining KHA, green space, and parking

Table 11-1: Consolidated Objection and Recommendation Summary

12. Conclusion

This formal objection has demonstrated that Development Application A006651694 for the 23-lot residential subdivision at 51 Crossacres Street, Doolandella fails to meet applicable legislative requirements and planning scheme performance outcomes across six distinct domains: ecological, green space and amenity, parking, engineering infrastructure, traffic and transport, and fire safety.

The proposed development would remove 289 trees, including 3,935 m² of Endangered Remnant Vegetation and Core Koala Habitat Area, without demonstrating that avoidance or meaningful on-site retention has been properly investigated. The reliance on offset payment does not, of itself, resolve the planning and ecological impacts of clearing vegetation of this significance. To allow such would be willful enablement of avoidable ecological harm and loss of an important habitat.

It provides no communal open space, no visitor parking, and no fire hydrant coverage within the private road. Its stormwater strategy relies on private infrastructure on neighbouring land that has not been condition-assessed. Its traffic assessment uses NSW-sourced data that likely underestimates Brisbane suburban vehicle generation, and makes no baseline traffic count of the

affected District Road. And its lot yield of 23 dwellings is nearly double the neighbourhood plan benchmark density.

These are not minor technical shortcomings. They represent fundamental deficiencies in the planning and engineering basis of the application that cannot be addressed through minor conditioning. A comprehensive redesign — producing approximately 12–15 lots, retaining the Endangered Remnant Vegetation, providing green space and visitor parking, and delivering compliant fire safety infrastructure — would produce a development that could credibly satisfy the relevant planning scheme codes and legislative obligations.

While housing supply is an important planning priority, this site contains ecological constraints that distinguish it from other nearby acreage, nursery and former rural land that may have residential development potential without the same level of remnant vegetation impact. The existence of less ecologically constrained development opportunities in the surrounding locality reinforces the need for this proposal to avoid unnecessary clearing of one of the remaining isolated pockets of remnant vegetation. Native fauna displaced from this fenced and road-bound site may have limited practical ability to relocate to comparable habitat nearby.

Only three years ago, the Planning and Environment Court of Queensland gave decisive weighting to ecological mapping in *Roseingrave & Anor v Brisbane City Council & Anor* (No 2) [2022] QPEC 43. The Court dismissed the subdivision appeal because clearing approximately 75% of the site's trees would cause unacceptable environmental harm, making minor retention and rehabilitation measures insufficient. The proposed subdivision at 51 Crossacres Street raises a comparable concern because it proposes complete clearing with no meaningful retention or rehabilitation outcome. Approval in its current form would be difficult to reconcile with that planning and environmental precedent and may reward land management that allowed invasive weeds to compromise parts of the habitat relied upon by remaining native species.

Brisbane City Council is respectfully but firmly requested to refuse Development Application A006651694 in its current form, and to require the applicant to undertake a comprehensive site-responsive redesign that genuinely reflects the ecological, infrastructure, traffic, and fire safety constraints of this site before resubmitting for assessment. The affected community and the broader public interest are best served by a development outcome that protects endangered vegetation, delivers genuine amenity, and does not impose avoidable infrastructure burden, stormwater overflow, fire risk, or traffic impact on existing and future residents.

Sources referenced: Traffic Engineering Report ^[3]; Engineering Report ^[2]; TRRP and KMP documents ^[1], Potential Site Options^[4].

References

Grounded sources cited in this submission:

[1] SARA Documents Referenced in Conditions.pdf

[2] A4 - Engineering Report and SWMP.pdf

[3] Traffic Engineering Report.pdf

[4] Site Options.pdf