



**City Planning and Economic Development Services
Development Services**

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11 September 2026

The Scout Association Of Australia Queensland Branch Inc

C/- Gaskell Planning Consultants

PO BOX 8103

WOOLLOONGABBA QLD 4102

ATTENTION: Luke Butler

Application Reference: A007059194

Address of Site: 31 BUNYA ST MOUNT CROSBY QLD 4306

Dear Luke

RE: Information request in accordance with the Development Assessment Rules

Council's review of the proposed boundary realignment (4 into 4 lots) has identified significant planning and legislative issues that prevent support of the application in its current form. Based on the information submitted to date, Council is not satisfied that the proposed development can comply with the relevant requirements of the planning framework or avoid prohibited development outcomes under State legislation.

The proposed development is within a mapped koala priority area (KPA) and koala habitat area – core (KHA). The submitted s5 Environmental Report identifies that the indicative Building Location Envelopes (BLEs) would result in interference with approximately 1,042 m² of mapped KHA and KPA, exceeding the 500 m² exempt development threshold under Exemption K of the *Planning Regulation 2017*. The report further concludes that BLE 4 is not associated with an existing lawful structure and cannot rely on essential management clearing provisions, resulting in the proposed BLEs constituting prohibited development under Schedule 10, Part 10, Division 2 of the *Planning Regulation 2017*.

While the BLEs have subsequently been removed from the plans, no evidence has been provided to demonstrate that future dwellings, access arrangements, service infrastructure and bushfire management measures can be accommodated on the proposed lots without resulting in prohibited interference with mapped koala habitat. Consequently, Council requires further information to establish whether the proposed boundary realignment can create lots capable of supporting lawful future development.

Building Location Envelopes and Koala Habitat in SEQ Region

1. Council notes that AO32 of the Subdivision code requires proposed lot design and layout to demonstrate the conservation of ecological features, significant vegetation, koala habitat trees and rural landscape values through an appropriate spatial configuration. The note to AO32 further states that compliance is to be demonstrated through the provision of Building Location Envelopes (BLEs) or a development footprint plan for each lot.

In addition, AO32 requires the proposed lot configuration to demonstrate that future use and normal occupation of each lot can occur without unacceptable impacts from identified hazards, including through the provision of appropriate buffers, building setbacks, structures or other mitigation measures. Any approved development footprint plan or BLE forms part of the development approval and is to be included on the plan of subdivision in accordance with the *Land Title Act 1994* and *Land Act 1994*.

Given the site's location within a mapped Koala Habitat Area (KHA) and Koala Priority Area (KPA), and the findings of the submitted Ecological Assessment regarding potential prohibited development outcomes, Council is not satisfied that the proposed lots can accommodate future dwellings, access, services and bushfire management requirements without adverse impacts on mapped koala habitat. The proposed development may be prohibited development under Schedule 10, Part 10, Division 2, Section 16A of the *Planning Regulation 2017*.

- a. Provide revised plans showing a Building Location Envelope on each proposed lot. The plans must demonstrate that:
 - a. future dwellings, access, services and associated works can be accommodated on each lot;
 - b. development can occur without constituting prohibited development as per the criteria in Schedule 10, Part 10, Division 2, Section 16A of the *Planning Regulation 2017*;
 - c. ecological features, significant vegetation and koala habitat are appropriately conserved; and
 - d. the proposed lot configuration complies with AO32 of the Subdivision code and all relevant planning scheme requirements.
- b. If development is not exempted development under Schedule 24 of the Planning Regulation 2017 (e.g. interference with koala habitat exceeds 500m² for the premises), the application will require a referral to the State Assessment Referral Agency for assessment and the State Development Assessment Provisions Code 25: Development in South East Queensland koala habitat areas as per Schedule 10, Part 10, Division 3, Subdivision 3 of the Planning Regulation 2017 will need to be addressed.

Biodiversity areas and Waterway corridors

2. The site is mapped within the High Ecological Significance (HES) and High Ecological Significance Strategic (HESS) sub-categories of the Biodiversity areas overlay and the Local and City-wide Waterway Corridors sub-categories of the Waterway corridors overlay, triggering assessment against PO4 of the Biodiversity areas overlay code and PO1/PO6 of the Waterway corridors overlay code.

The proposed lot configuration contains extensive biodiversity and waterway corridor values. The proposed plans do not identify Development Footprint Plans (DFP), bushfire management zones or propose vegetation clearing. There is insufficient information to demonstrate that future dwellings, access, services and bushfire protection measures can be accommodated without impacts to ecological values.

Detailed ecological assessment have not been undertaken to demonstrate avoidance and minimisation of impacts. Ecological investigations identified that future development would require interference with mapped KHA within a KPA beyond available exemptions. Removal of the DFPs does not demonstrate that a lawful development outcome can be achieved elsewhere on the proposed lots.

The proposed boundary realignment would introduce additional lot boundaries through mapped waterway corridor areas, resulting in fragmentation of ecological corridors and increasing the likelihood of future fencing, access tracks, asset protection zones and vegetation clearing that may compromise corridor connectivity and ecological function.

- a. Provide revised ROL plans that clearly demonstrate each Development Footprint Plan and bushfire management zone for each lot.
- b. Provide a detailed Ecological Assessment Report in accordance with the Biodiversity areas planning scheme policy prepared by a suitably qualified ecologist, including:
 - i. A Vegetation Retention Plan in accordance with the Biodiversity areas planning scheme policy;

- ii. All trees 100 mm diameter at standard height (DSH) or greater on site/external works area and within 6 meters of site boundaries. Note: Trees must be surveyed accurate to +/- 100mm;
- iii. The proposed development plan (as an overlay) including all services/infrastructure on site and external to the site, which clearly shows the full extent of all earthworks (cut/fill) required during construction of the development.
- iv. A clear indication of which trees are to be retained and which trees are to be removed, including the following information:
 - o Scientific name;
 - o Height;
 - o Diameter of tree trunk at standard height (DSH);
 - o Crown diameter;
 - o Habitat features including hollows and scratch marks, nests etc.
 - o Notional Root Zones (NRZs) (in accordance with AS4970); and
 - o General health assessment.
- v. 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.
- vi. Detail of fauna movement solutions to enable safe movement of fauna throughout the site and within the wider landscape.
- vii. Provide a Concept Rehabilitation Plan in accordance with the Biodiversity areas planning scheme policy in the form of scaled plans and supporting documentation to demonstrate that development enhances biodiversity, native habitat and fauna movement which includes at least the following information:
 - o Description of proposed rehabilitation, including earthworks, methods, objectives.
 - o Stabilisation methods for all areas of exposed soil surface.
- viii. Where a significant residual impact remains, offsets will be required under the *Environmental Offsets Act* 2014 and the Offsets planning scheme policy (PO9).
- ix. An assessment against Section C of the Biodiversity areas overlay code and Section A and Section C of the Waterway corridors overlay code.

Bushfire

3. The Bushfire overlay code requires development to demonstrate that it will not be exposed to intolerable levels of radiant heat (i.e. $>29\text{kW/m}^2$) (PO1), will limit the spread of bushfire within the development site (PO16), promotes safe site access/egress for emergency services and future occupants (PO17), provides alternative egress routes (PO18) and provides adequate infrastructure to support firefighting (PO19).

‘Preliminary Bushfire Modelling and Essential Management Clearing’ information was submitted as part of the Preliminary Assessment and Advice from s5 Environmental (BCC received 28/07/2026). A site-specific bushfire hazard assessment bushfire management plan is required to be submitted in accordance with PO1 of the Bushfire overlay code.

The proposed subdivision does not demonstrate a development can achieve a radiant heat flux of 29kW/m² or less as required by PO1 of the Bushfire overlay code. Further, the information provided does not demonstrate bushfire setbacks can be contained wholly within the proposed property boundaries. The extent of vegetation management required to achieve an acceptable bushfire outcome is intrinsically linked to the site's ecological constraints, including mapped KHA within a KPA.

- a. Provide a site-specific bushfire hazard assessment (and management plan) in accordance with the Bushfire planning scheme policy or other approved methodology. This includes a radiant heat exposure assessment to demonstrate compliance with PO1 of the Bushfire overlay code can be contained wholly within each lot. Bushfire Reporting and hazard assessment guidelines are available within the [technical assessment guide for Bushfire reporting](#) available on Council's website.
- b. Provide an assessment against the relevant sections of the Bushfire overlay code, based on the findings of the Bushfire reporting.

Access

4. The development proposes vehicle access is to be provided for each lot via the relevant street frontages however the proposed plans are unclear where road pavements exist or where suitable locations for each required access exist.
 - a. Provide amended plans in accordance with PO3 of the Subdivision code that demonstrates existing road pavements and a vehicle crossover for each lot to each of the BLE's generally as per BSD-2026 where applicable.

Lawful Point of Discharge

5. As no information has been provided regarding a suitable lawful point of discharge for each lot, further information is required.
 - a. Provide amended plans in accordance with PO3 of the Stormwater Code that show a roof water pit and soakage system at the edge of each BLE. Ensure there are no adverse scouring, and drainage impacts within and external to the newly created lots. Provide adequate boundary setbacks to facilitate dispersed flow discharge as per Section 7.6.8 of the Infrastructure Design PSP.

Wastewater

6. The Wastewater code assessment indicates new disposal systems aren't proposed however these systems have specific requirements as per the Wastewater code and as BLE's within each lot are required to be provided Council needs to ensure these BLE's are sufficient in size to accommodate this.
 - a. Provide a Wastewater Report that demonstrates compliance with the requirements of the Wastewater code, treatment areas are to be shown within BLE's.

Fire Protection

7. The proposed development will result in a lot that at its furthest point will be more than 90m away from an existing UU hydrant in conflict with the requirements of the Infrastructure design code.
 - a. Provide amended plans and sufficient additional information in accordance with PO9, PO23 and PO24 of the Infrastructure design code that demonstrates adequate fire protection including provision of a fire hydrant on the street frontage to serve the development where any point of a possible building envelope is or will be more than 90m from a UU fire hydrant.

High Voltage Powerline

8. The site is located within the Major electricity infrastructure high voltage powerline easement sub-category. The applicable assessment benchmarks require development involving reconfiguring a lot on land subject to this sub-category to achieve the minimum safety clearances set out in the *Electrical Safety Regulation 2013*. The development must also demonstrate that the expected level of hazard and risk to future residents in proximity to high

voltage electrical works is within acceptable limits, in accordance with PO4/AO4.1 and AO4.2 of the Regional infrastructure corridors and substations overlay code.

- a. Provide an assessment prepared by a suitably qualified electrical specialist demonstrating that the proposed lots, development footprint plans and any future dwellings or structures will not be located within an area subject to an unacceptable level of hazard or risk associated with the high voltage powerline infrastructure. The assessment must confirm compliance with the minimum safety clearance requirements under the *Electrical Safety Regulation 2013*

Urban Utilities (UU)

Council does not undertake water and sewer assessment of any planning applications. Contact UU on (07) 3432 2200 to discuss any water and sewer issues and whether you are required to submit an application to UU for assessment.

Responding to this request

Your response should include a summary table which outlines any changes to performance outcomes and plans that have resulted from addressing the issues outlined above. The table should also include details of any supporting documentation.

If a response is not provided within the prescribed response period of three (3) months assessment of the application will continue from the day after the day on which the response period would have otherwise ended.

Email your response to DSPlanningSupport@brisbane.qld.gov.au quoting the application reference number A007059194.

Please phone me on telephone number below during normal business hours if you have any queries regarding this matter.

Yours sincerely



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