



18 March 2026
Brisbane City Council
Attn: Dalina Howden
Planning Services South, Development Services
Dalina.howden@brisbane.qld.gov.au

Re. Response to Information Request from Brisbane City Council for Development Application
A006924490 on land at 76-92 Crossacres Street, Doolandella QLD 4077

Dear Dalina,

28 South Environmental has been engaged by ADC Group No 19 Pty Ltd C/- JFP Urban Consultants to provide ecological and environmental planning services in support of a Development Application for a Reconfiguring a Lot (**RoL**) three (3) lots into 68 lots (**Proposed Development**) (A006924490). The Proposed Development is located at 76-92 Crossacres Street, Doolandella, formally described as Lot 40, 41 and 42 on RP90234 (hereafter referred to as 'the **Site**').

This Information Request Response (**IRR**) has been prepared to address ecologically relevant items from BCC's Information Request issued on 6 February 2026 (**Attachment 1**) in relation to the Proposed Development.

Significant Landscape Trees and Significant Vegetation (NALL – SNV & SUV)

Item 6) Significant landscape trees (SLTs) are evident within the area covered by Significant landscape tree overlay mapping in the south-eastern section of the site, however the Tree Retention Plan does not identify the location of Significant landscape trees as required by Section C of the Significant landscape tree overlay code.

- a. *Revise the Tree Retention Plan and Schedule to clearly identify the location of any significant landscape tree that meets the criteria of a significant landscape tree of the species and dimensions listed in Table 8.2.19.3.B.*

Item 7) Other Significant Vegetation is also apparent within the site, especially within the existing eastern lot where trees are protected by NALL – Significant Native Vegetation (SNV) and Significant Urban Vegetation (SUV) categories.

- a. *Identify on the Tree Retention Plan, the location of trees meeting one or more criteria of Significant Vegetation as described in Section 2 of the Vegetation PSP (eg, colour coded for easier identification).*
- b. *Provide an Arborist Report, prepared by a qualified Arborist in accordance with 1.7.2 of the Infrastructure design PSP, to comment on the ecological and landscape character values of existing trees within the site. The Report must include all trees with a DBH of 250mm or greater (excluding weed species), with clear supporting evidence of reported findings (eg photos) to support assessment. In addition:*
 - i. *Where removal of Significant vegetation is proposed, the Report must provide a rationale to support the proposed removal.*
 - ii. *Where removal of a Significant landscape tree is proposed, the Report must demonstrate that all feasible options to retain the tree and manage development impacts have been investigated and that tree retention cannot be achieved, as required by Section 4 of the Vegetation PSP.*

Response to Item 6 and Item 7

The Tree Retention Plan and Tree Schedule have been amended to identify Significant Landscape Trees and is provided as part of the IR response materials.

It is acknowledged that the Information Request references the protection of existing vegetation under the Natural Assets Local Law 2003 (NALL). Consideration of this matter is, however, more appropriately addressed at later

stages of development and is not relevant to the determination of this development application. The assessment herein is therefore appropriately limited to the relevant provisions of the City Plan.

From an ecological perspective, the vegetation onsite comprises a small and highly isolated patch of urban trees situated within a transitioning peri-urban suburb. The vegetation does not form part of a broader ecological corridor, remnant patch, or significant stepping stone habitat. Located within an existing residential lot, the scattered trees are subject to a high edge-to-area ratio and ongoing urban disturbances, which significantly diminishes their habitat value and long-term ecological viability.

The ecological assessment indicates that the vegetation provides minimal habitat value. The trees are unlikely to support significant fauna populations beyond common urban-adapted species, and the patch does not meaningfully contribute to landscape-scale biodiversity outcomes. Given the degree of isolation and modification of the surrounding environment, the retention of the vegetation would not materially improve ecological connectivity or conservation outcomes. The proposed removal is, therefore, not expected to result in a residual ecological impact.

The Proposed Development provides the opportunity for replacement planting using locally appropriate native species that are known to provide improved foraging resources (including winter-flowering and fruiting species) and structural diversity compared to the existing vegetation. Such landscaping will deliver a more purposeful urban ecological outcome over the long term.

Ecologically, the proposed subdivision aligns with Overall Outcome 2(b)(ii) of the Emerging Community Zone Code and PO19 of the Subdivision Code, as it avoids the removal of vegetation of ecological significance and allows for enhanced ecological function through planned native landscaping. In this context, a detailed assessment against the Significant Landscape Tree Overlay Code is also not warranted, as the proposal is focused on achieving improved landscape amenity through landscape design.

Matters relating to landscape character, visual prominence, shading and contribution to streetscape are appropriately addressed through landscape design and arboricultural assessment, and are therefore considered separately by the project Landscape Architect. A Conceptual Landscape Design plan has been provided as part of the IR response material.

Further, an Arborist report is not required at this stage of the Proposed Development. Where trees may be retained, an Arborist assessment can be undertaken at the Operational Works Stage when detailed design and construction methodology is available for consideration.

We trust this information addresses all relevant elements of the Information Request. If you have any further questions, please don't hesitate to contact the undersigned.

Kind regards,

Abi Kinnaird
Graduate Environmental Planner
E: abi@28south.com.au

Chris Johnston
Senior Environmental Planner
E: Chris.j@28south.com.au

List of Attachments

Attachment 1 – BCC Information Request

Attachment 1 –
BCC Information
Request



Dedicated to a better Brisbane

06 February 2026

ADC Group No 19 Pty Ltd
C/- JFP Urban Consultants
Attn: James Collie
PO Box 3634
SOUTH BRISBANE QLD 4101

ATTENTION: James Collie

Application Reference: A006924490
Address of Site: 92 CROSSACRES ST DOOLANDELLA QLD 4077

Dear James

RE: Information request in accordance with the Development Assessment Rules

Council has carried out an initial review of the above application and has identified that further information is required to fully assess the proposal.

Structure planning

- 1) The Traffic Impact Assessment states that the proposed internal road network will allow for an internal road connection through to the adjacent site to the east located at 66 Crossacres Street (BCC ref: A006831357) however the Engineering Concept plans do not show this road connection to 66 Crossacres Street.
 - a) Provide an amended structure plan / Traffic Functional Layout, showing the interface between the proposed north south road with the road linking from adjoining site. This road link is to coordinate with the adjoining proposed development at 66 Crossacres Street, Ref: A006831357.

Waste servicing

- 2) The development is required to provide a Type B2 6.5m wide driveway crossover to enable a Refuse Collection Vehicle (RCV) to safely and efficiently turnaround the Paddington Street road extension stub road. The proposed Type B1 6.0m wide driveway crossover may be acceptable subject RPEQ endorsement. Furthermore, a review of the 'Engineering Concept – Bioretention Basin 2 Details' demonstrates the 'Maintenance Access and Vehicle Turnaround Driveway' has non-compliant gradient for the RCV turnaround manoeuvre of 1:6.

In accordance with PO4/ AO4.1c. & PO9/ AO9c. of the Subdivision code, PO8/ AO8.1 & AO8.2 of the Infrastructure design code and PO1/ AO1, PO19/ AO19.2 & AO19.3 of the Transport, access, parking and servicing (TAPS) code, demonstrate the following:

- a) Submit RPEQ certified swept path analysis for a 10.3m Side Loading RCV (As per BSD-3004) as specified in Table 3 of the Refuse PSP can safely and efficiently service the development and turnaround the drainage reserve 'Maintenance Access and Vehicle Turnaround' in stage 2 whilst utilising a lock-to-lock time of 6.00s and curb-to-curb turning radius of 9.757m.

- b) Provide amended 'Engineering Concept – Bioretention Basin 2 Details' plan which clearly demonstrates the RCV turnaround has compliant grades (i.e., 1:8 maximum gradient in accordance with the Australian Standard).
- 3) A review of the 'Engineering Plans' has identified that Lot 18 has been provided an indicative bin placement location at the back of the pedestrian footpath in lieu of at the kerb and channel. Provide amended 'Engineering Plans' which demonstrates Lot 18 Indicative bin placement is at the kerb channel.

Pedestrian movement

- 4) The Crossacres Street frontage is mapped as a Neighbourhood Street minor street within the Streetscape hierarchy overlay code and is required to provide a minimum 3.75m wide verge width. It is unclear if the site frontage provides a minimum 3.75m wide verge width to allow for the delivery of Neighbourhood Street minor streetscape works that provide a high-quality subtropical streetscape with a strong pedestrian and amenity focus.
 - a) In accordance with PO1/AO1 of the Streetscape hierarchy overlay code and PO6 of the Road hierarchy overlay code, provide amended plans that:
 - i) Clearly illustrate the nominal face of kerb for the full length of the Crossacres Street frontage of this lot to identify the existing verge width.
 - ii) Provide the necessary area as land dedication to achieve a 3.75m verge width for the full length of the Crossacres Street frontage.
- 5) The development is to ensure that streetscape works (including tree planting, paving and verge and kerb treatments) are designed in accordance with the CP2014's Streetscape Hierarchy Overlay Code and Chapter 3 of the Infrastructure design PSP. In particular, amendment to plans is required to demonstrate the provision of a safe, connected and permeable walking route with the surrounding area. The additional following information is to be provided to demonstrate compliance with CP2014 provisions:
 - i) Demonstrate that the verge levels will be compatible with a maximum 1:50 verge crossfall, required to comply with PO2 of the Streetscape hierarchy overlay code and the standards outlined under the Infrastructure design planning scheme policy Chapter 3 Section 3.7. Please provide further details on existing and proposed finished levels to confirm the design will be compatible with Council standards for verge upgrades.
 - ii) Indicate via survey, all above ground service infrastructure (e.g. power poles, street lights, water meters, electrical pillars etc) and existing street trees on the resubmitted drawings.

Significant Landscape Trees and Significant Vegetation (NALL – SNV & SUV)

- 6) Significant landscape trees (SLTs) are evident within the area covered by Significant landscape tree overlay mapping in the south-eastern section of the site, however the Tree Retention Plan does not identify the location of Significant landscape trees as required by Section C of the Significant landscape tree overlay code.
 - a) Revise the Tree Retention Plan and Schedule to clearly identify the location of any significant landscape tree that meets the criteria of a significant landscape tree of the species and dimensions listed in Table 8.2.19.3.B.
- 7) Other Significant Vegetation is also apparent within the site, especially within the existing eastern lot where trees are protected by NALL – Significant Native Vegetation (SNV) and Significant Urban Vegetation (SUV) categories.
 - a) Identify on the Tree Retention Plan, the location of trees meeting one or more criteria of Significant Vegetation as described in Section 2 of the Vegetation PSP (eg, colour coded for easier identification).
 - b) Provide an Arborist Report, prepared by a qualified Arborist in accordance with 1.7.2 of the Infrastructure design PSP, to comment on the ecological and landscape character values of existing trees within the site. The Report must include all trees with a DBH of

250mm or greater (excluding weed species), with clear supporting evidence of reported findings (eg photos) to support assessment. In addition:

- i) Where removal of Significant vegetation is proposed, the Report must provide a rationale to support the proposed removal.
 - ii) Where removal of a Significant landscape tree is proposed, the Report must demonstrate that all feasible options to retain the tree and manage development impacts have been investigated and that tree retention cannot be achieved, as required by Section 4 of the Vegetation PSP.
- 8)** A response to the Significant landscape tree overlay code has not been provided for assessment.
- a) Provide a Code Assessment that responds to the Significant landscape tree overlay code.
- 9)** The proposed lot layout does not retain and incorporate Significant Vegetation (including SLTs) in accordance with PO19 / AO19.1 of the Subdivision code.

Section 4 of the Vegetation PSP requires that, in exceptional circumstances where a Significant landscape tree cannot be retained, development replaces a Significant landscape tree with replacement trees.

- a) To comply with PO3/AO3 of the Significant landscape tree overlay code, Section 4 of the Vegetation PSP, and PO19/AO19 of the Subdivision code:
 - i) Revise the lot layout to ensure the retention of Significant Vegetation, including Significant landscape trees, where possible.
 - ii) Where it has been demonstrated that Significant Vegetation and Significant landscape trees cannot be retained, propose options to integrate replacement planting in accordance with Section 4 of the Vegetation PSP within the revised lot layout.

Existing land uses

- 10)** It is unclear what the current existing land use is at 84 Crossacres Street, Doolandella (L.41 RP.90234). A review of aerial mapping show that the Dwelling house was removed between 19 July and 23 August 2025 and a new hardstand carpark area and shipping container structure appears to have been established on the site between 23 August 2025 and the 3 December 2025.
- a) Provide details of how the site is currently used with these structures on site and whether applicable approvals have been sought or provide details if it is accepted development.

11) 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 A006924490.

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

Yours sincerely

A handwritten signature in black ink, consisting of three stylized, overlapping loops, set against a light grey rectangular background.

Dalina Howden
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Planning Services South
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Development Services
Brisbane City Council