

Our ref: 13013
Council ref: A006977900



5 June 2026

Brisbane City Council - DA South
GPO Box 1434
Brisbane QLD 4001

Via email: ryan.casey@brisbane.qld.gov.au

Dear Ryan,

RE: **RESPONSE TO INFORMATION REQUEST - A006977900**
****SECTION 13.2 OF THE DEVELOPMENT ASSESSMENT RULES****
****31 WOODVALE CRESCENT, FOREST LAKE QUEENSLAND 4078****

We act on behalf of River Quarter No. 2 Development Co. Pty Ltd, the Applicant in relation to a Development Application lodged with Brisbane City Council under the *Planning Act 2016* (the Planning Act) over the above land seeking:

- Reconfiguring a Lot – 1 Lot into 19 Lots (16x community title lots and 3x standard format Lots) and new private road.

On 9 April 2026 we received an Information Request from Brisbane under Part 3 of the *Development Assessment Rules* (DA Rules). In accordance with Section 13.2 (a) of the DA Rules, we now provide a response to all of the information requested.

In support of our response, we provide the following attachments:

- Attachment A** Amended Proposal Plan and BLE Plan, prepared by Saunders Havill
- Attachment B** Surrounding Density Plan, prepared by Saunders Havill
- Attachment C** Amended Civil Engineering Plans, prepared by HCE Engineers
- Attachment D** Amended Swept Path, prepared by L+R
- Attachment E** Amended Tree Retention and Removal Plan, prepared by Saunders Havill

The proposed development has been amended to incorporate the following changes in response to Council's Information Request:

- Amendments to lot sizes for proposed Lots 1 – 8 resulting in an increased average lot size to 361m² consistent with emerging community outcomes;
- The growth of Lot 7 into land which is already proposed to be cleared for the works associated with the original boundaries;
- Minor adjustments to the internal road layout and turn-around adjoining Lot 8; and
- Increase in rear lot setbacks for Lots 9-11 and 17-19 to achieve a minimum 6m.



In accordance with Schedule 2 of the *Planning Act 2016* (the Act) and Schedule 1 of the *Development Assessment Rules*, we confirm that the above changes are either made in response to an information request and/or do not:

- result in a substantially different development;
- seek approval for prohibited development;
- require the application to be referred to any additional referral agencies;
- change the type of development approval sought; or
- require impact assessment for any part of the changed application, if the original application did not involve impact assessment, notwithstanding that the application is already impact assessable.

Accordingly, the response does not affect the development assessment process.

A response to each item of Council's Information Request is included below.

Response to Information Request

1. *Lawful Point of Discharge*

The site does not currently have a Lawful Point of Discharge (LPD) until the approved development at 41 and 55 Woodvale Crescent is constructed and sealed. These adjoining lots are proposed to provide LPD both in terms of stormwater water quality and quantity management for the site. It has not been demonstrated how an LPD will be achieved should the downstream sites not proceed in a timely manner.

- a) Confirm how the timing and delivery of the LPD is proposed to be managed should the adjoining developments not be constructed concurrently or prior to the subject site.*
- b) Alternately, submit amended plans in accordance with AO3.1-3.4 / PO3 and AO11.1-11.3 / PO11 of the Stormwater code to provide an independent LPD for the development in the event of delays to the downstream development.*

Response: The applicant acknowledges that LPD is required from the adjoining development approval (REF: A006852887). It is the intention that the development will be constructed concurrently or following the completion of the adjoining development. A level of certainty that the adjoining development is progressing is provided through the obtainment of permits and commencement of operational works, including installation of stormwater infrastructure and bulk earthworks. The image below has been taken of the adjoining development site and shows the stormwater infrastructure that will be used for connections from this proposed development site as the lawful point of discharge. Accordingly, we are confident that the connection will be in place and the applicant is happy to accept a condition that lots cannot be sealed until this or a suitable alternative is in place.





Figure 1 - Progress on downstream stormwater connection to south

2. Lot Sizes and Yield

It is noted in response to the Forest Lake neighbourhood plan code and the Subdivision code that the application proposes lots sizes ranging from 253m² to 350m² with an average lot size of approximately 287.4m², excluding the proposed environmental protection zone lot. These lot sizes are not reflective of the character of this transitioning area.

- a) Provide amended plans that increase the minimum lot sizes and overall average lot size to be more reflective and in keeping with the character of the surrounding existing and emerging community neighbourhoods.

Response: The layout has been amended to reduce the number of sub-300m² lots (**Attachment A**). The development average lot size is now 361m² (noting that lots 7 and 8 have been counted as 900m² lots), consistent with the expectations of the Emerging Community Zone. Although there are still three sub-300m² lots, these are considered appropriate in this instance given:

- There is a high proportion of sub-300s to the immediate south. These lots are in highly visible locations fronting Woodvale Crescent. This fundamentally differentiates Forest Lake from typical Emerging Communities;
- Development in the wider locality also presents a higher density than typical EC development, many of which are proposed above 24dw/ha – refer to **Attachment B** and **Figure 2** below;





Figure 2 – Surrounding density

- Notwithstanding, the sub-300sqm lots forming part of this application are concealed within the development with larger 300sqm+ lots positioned at the external boundaries.
- Notwithstanding, all lots achieve 10m frontages, making sub-300 and 300+ lots indistinguishable;
- Despite some sub-350m² lots, each lot is capable of accommodating a 9m × 15m rectangular building envelope, sufficient to support a detached dwelling house;
- There is an overriding planning need in the public interest for additional housing; and
- The smaller lots provide a reduced price point for single income families and first homeowners who are currently priced out of the market.

In addition to the above, the site has many attributes to support a higher density including but not limited to that it:

- Has convenient access the Logan Motorway;
- Is 300m from the Neighbourhood Centre (which includes a Foodworks) on Woogaroo Street;
- Is 500m from Grand Avenue State School;
- Is 1.5km from The Forest Lake Shopping Centre; and



- Is proximate to employment opportunities in the Carole Park, Ellen Grove, Richlands and Staplyton Rd industrial areas.

In light of the above, it is considered that the proposed lot sizes are appropriate in this instance.

3. Development Footprint Plan

The Plan of Development provides for setbacks beyond those afforded under Council's Dwelling house (small lot) code. With reference to AO27.1-AO27.4 / PO27 of the Subdivision code:

- a) *Submit an amended plan to provide amended rear boundary setbacks as follows:*
 - i) *A 6.0m rear boundary setback to Lots 9-11 and 17-19.*
 - ii) *Otherwise, a 3.0m rear boundary setback for a part of a building or structure up to 4.5m high and a 4.5m rear boundary setback for a part of a building or structure over 4.5m high.*

Response: The Building Location Envelope (BLE) has been amended for Lots 9-11 and 17-19 to provide a rear setback minimum of 6m. Upper level setbacks are not typically shown on our plan of development but we confirm they remain unchanged from the default requirements. Refer to **Attachment A.**

4. Development Footprint Plan

The proposal seeks to retain vegetation mapped as High Ecological Significance (HES) and High Ecological Significance Strategic (HESS) sub-categories of the Biodiversity areas overlay within an Environmental Protection Zone (EPZ) under the ownership of Lot 8. While this is generally supportable, the proposed extent of the building envelope is to be set back a minimum of 3m from the Notional Root Zone (NRZ) of Trees 7, 10, and 126 to ensure these trees do not pose a risk to future landowners and can be retained in perpetuity.

- a) *Submit amended plans which demonstrate the Lot 8 building envelope is setback a minimum of 3m from the NRZ of Trees 7, 10, and 126.*

Response: The BLE's on Lots 7 and 8 have been setback 3m from the NRZ of any trees to be retained in the EPZ in accordance with Council's request.

Note: Following confirmation that a number of trees within the Lot 7 building pad footprint will require removal due to earthworks impacts, Lot 7 has been enlarged to utilise the resultant cleared area. Importantly, the revised lot layout does not increase vegetation impacts or require the removal of any additional trees.



5. Access and Servicing

Although the proposed Community Titles Scheme (CTS) subdivision layout is shown to have a 6.5m wide internal road, the Traffic Report states that the internal road will be 6m wide. Furthermore, Table 9.4.10.3.C of the Subdivision Code intends for a 1.5m wide footpath along the CTS road, which is not provided. Notwithstanding, in support of a performance solution, a minimum 1m wide footpath along the internal CTS road is considered appropriate in this instance to balance pedestrian movement with the provision of street trees and a higher-quality internal streetscape. Accordingly:

- a) Submit an amended traffic report and proposal plans in accordance with Table 9.4.10.3.C / PO36 of the Subdivision code to confirm the provision of a 6.5m wide CTS carriageway.
- b) Provide a performance-based justification outlining why a reduced footpath width facilitates street tree planting and safe pedestrian access along the CTS road.

Response: Fundamentally, there is not enough space in a 10m reserve for a 6.5m carriageway and a 1.5m footpath. In the applicant's experience, it results in small strips of grass either side of the footpath that create ongoing maintenance issues; and generally clashes with electrical pillars. The applicant has designed multiple CTS estates without a footpath (including Keona Rd and 846 Beams Road, details below) and is of the view that it results in a superior visual outcome.

Given the small scale of the development, extremely low traffic volumes and low posted speed (20km/h), it is unlikely that there will be any conflicts with pedestrians and vehicles. As such, a shared carriageway arrangement is proposed, with pavement differentiation at the entry to delineate a changed traffic environment. Accordingly, while the proposal does not provide a footpath in accordance with the acceptable outcome, it achieves the intent of PO36 by delivering a safe, functional and high-amenity pedestrian environment that is appropriate to the role and context of the internal CTS road.

In addition, a review of the State Government's Planning Regulation 2017 – "Walkable Neighbourhoods" provisions and the Land Act 1994, indicates that these requirements are only triggered where the reconfiguration includes the construction or extension of a "road". Under the Land Act, Section 93 outlines the meaning of road and states that a road means an area of land, whether surveyed or unsurveyed, for the purpose of a road for public use. The proposed road is not for public use and as such the Walkable Neighbourhood footpath requirements are not applicable. Notwithstanding, a footpath is still proposed along the site's frontage.

We note that Council has previously accepted a 6.5m pavement with no footpath for CTS private roads in many recent developments including:

- 159 Ridley Rd, Bridgeman Downs (A006301420)
- 74 Redhead Street, Doolandella (A006305517);



- 150 Lovat Street, Ellen Grove (A005503509)
- 35 Roxwell Street, Ellen Grove (A005718505);
- 89 Cloverdale Road, Doolandella (A005256667 – approved with a 9.5m wide private road);
- 846 Beams Road (A006604001);
- 71 Keona Road, McDowall (A006575259).

Regarding carriageway width, it is acknowledged that the traffic report incorrectly stated this as 6m, however we confirm that the pavement is intended to be 6.5m consistent with the civil engineering and subdivision plans. In light of the minor nature of this issue, the traffic report has not been amended.

6. Access and Servicing

The offset T-head proposed for Refuse Collection Vehicle (RCV) turnaround does not achieve the design provided for by standard drawing BSD-3001. However, an alternative design can be considered if swept paths demonstrate a safe and efficient 3-point turn using a lock-to-lock time of 6 seconds. As the submitted RCV swept path analysis has not demonstrated a lock-to-lock time:

- Provide amended plans in accordance with AO19.2-19.3 / PO19 of the Transport, access, parking and servicing code and AO4.1 / PO4 of the Subdivision code to show RPEQ certified swept path analysis for a RCV demonstrating safe and efficient servicing and use of the Offset T head facilities, while facilitating a kerb-to-kerb turning radius of 9.757m and a lock-to-lock time of 6 seconds.*

Response: Amended Civil Engineering Plans have been prepared to address Council's comments regarding the proposed offset T-head refuse collection vehicle (RCV) turnaround (refer to **Attachment C**). While the offset T-head does not strictly replicate the standard arrangement depicted in BSD-3001, the swept path analysis (refer **Attachment D**) for the nominated RCV demonstrates that:

- The design can accommodate a safe and efficient three-point turning movement with no conflicts;
- A kerb-to-kerb turning radius of 9.757 metres is achieved;
- The manoeuvre is undertaken using a lock-to-lock steering time of 6 seconds, consistent with Council's requirements; and
- Adequate clearance is maintained throughout the manoeuvre to ensure safe and practical refuse servicing.

On this basis, the amended design demonstrates that the proposed offset T-head functions effectively as an alternative to the standard BSD-3001 arrangement.



7. Tree Retention Plan

- a) *The submitted Ecological Assessment Report indicates the tree survey data was collected using a handheld Trimble GPS, providing sub-meter accuracy, and that some vegetation locations are survey accurate. However, in accordance with Council's Biodiversity areas planning scheme policy, tree survey data provided must be accurate to ± 100 mm. Handheld GPS data does not meet this accuracy requirement. All vegetation located within 3m of the development footprint interface is required to be surveyed to an accuracy of ± 100 mm, and the data collection methodology must be clearly documented. Accordingly: Provide an amended Tree Survey demonstrating that all vegetation within 3m of the development footprint interface has been surveyed in accordance with the Biodiversity areas planning scheme policy, achieving an accuracy of ± 100 mm. Data collected using handheld GPS devices will not be accepted.*
- b) *Provide a written statement detailing the methodology and equipment used to collect the amended Tree Survey data, including confirmation that the required survey accuracy has been achieved.*

Response: The tree plot has been updated with survey accurate tree locations, including all vegetation within 3m of the development footprint interface / property boundary). Refer to **Attachment E**

The survey was completed using conventional survey equipment connected to established survey control, rather than handheld GPS technology. The survey control network was established and verified in accordance with standard cadastral and engineering surveying practices. Individual trees were surveyed by locating the centre of the trunk at ground level and recording the position relative to the established survey control.

The resulting survey data was processed and incorporated into the Tree Retention and Removal Plan. The survey methodology achieved a positional accuracy of ± 100 mm or better for all vegetation located within 3 metres of the development footprint interface, satisfying the requirements of Council's Biodiversity Areas Planning Scheme Policy. The attached amended Tree Survey supersedes the tree locations previously derived from handheld GPS data and provides survey-accurate vegetation positions for assessment purposes. For context, the adopted methodology is consistent with standard ecological survey practices and has previously been accepted by Council for tree survey purposes, including under the applicant's recent Graham Road Approval (REF: A006852636).



8. Tree Retention Plan

The Development Impact Assessment Tree Retention Plan (Drawing no: 13013 E 04 Impact Assessment B, dated 11/03/2026) uses symbology that appears to be incorrect (i.e. majority of vegetation identified as dead/stag tree etc.).

- a) *Provide an amended Tree Retention Plan which correctly identifies the symbology of all vegetation.*

Response: An amended Tree Retention Plan has been prepared to reflect the latest layout changes and correct symbology. Refer to **Attachment E**.

9. Street Trees

Street trees are to be retained where possible and the application material must clearly identify the trees that will be impacted by the proposal. Moreover, the submitted tree retention and removal plan incorrectly identifies the street trees as non-juvenile koala habitat trees. To confirm the impacts to trees and vegetation that are within road reserve or on Council land, submit the following:

- a) *An Arboricultural Impact Assessment (AIA) as per AO2.1-2.2 / PO2 of the Streetscape hierarchy overlay code where any works are proposed within the Tree Protection Zone (TPZ) of street trees that are to be retained.*
- b) *Revised plans in accordance with AO2.1-2.2 / PO2 of the Streetscape hierarchy overlay code showing accurate identification of existing street trees and clear retention status, as well as driveway crossover locations and designs that maintain a minimum 2m clearance from all street trees identified for retention (refer to standard drawing BSD-2022).*
- c) *A detailed plan illustrating:*
 - i) *The location of all existing street trees.*
 - ii) *The proposed driveway crossover locations for all lots that have frontage to Woodvale Crescent.*
 - iii) *The proposed CTS road access crossover.*
 - iv) *All relevant utilities and inground service alignments.*
 - v) *A 1.2m wide footpath along the entirety of the Woodvale Crescent frontage.*
 - vi) *Detailed cut/fill information across the verge.*

This information is sought to ensure that verge gradients, crossfalls, and works will not adversely impact trees that are to be retained, and that footpath and driveway gradient functionality is maintained (refer to standard drawing BSD-2025).

Response: A total of six street trees are retained along Woodvale Crescent with only 4 removed to provide development access and potential driveway locations. Regarding those that are to be removed:

- Tree 169 is required to be removed for development access;
- Tree 170 is located within 2m of the development access crossover;



- Tree 174 is located where the driveway crossover is required;
- Tree 175 are affected by a combination of:
 - Footpath;
 - Sewer manhole and main work zone;
 - Stormwater drainage property connection.

Retained street tree locations have been overlaid with the civil drawings to ensure consistency between plans. The civil drawings contain all of the detail requested by Council, noting that there are no earthworks proposed in the verge. An Arborist Report is currently being prepared to support the retention of the six street trees.

Errors in the previous Tree Retention and Removal Plan have been corrected.

10. Environmental Offsets

Vegetation within the Biodiversity areas overlay is considered a Matter of Local Environmental Significance (MLES). Environmental offsets will be applicable for any portion of revised development which impacts upon native vegetation within the Biodiversity areas overlay. Detail on proposed area of impact and associated offsets must be provided in accordance with the PO9 of the Biodiversity areas overlay code, the Offsets planning scheme policy (PSP), and the Environmental Offsets Act 2014. Provide an Offset Delivery Strategy that confirms the total impact area to be offset, PO9 of the Biodiversity areas overlay code, the Offsets PSP and Environmental Offsets Act 2014:

- i) Provide a plan clearly identifying the existing HES and HESS Biodiversity areas overlay, 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) and any proposed reductions of mapped area to determine the area of impact. These may include the existing dwelling and curtilage, lawns, landscape gardens, cleared areas, and areas dominated by exotic weeds.*
- ii) Residual impacts must be offset using MLES3.*
- iii) Restoration works are required by the Biodiversity areas overlay code.*

Note: Onsite restoration works do not contribute to offsets as it is a separate requirement of the Biodiversity areas overlay code (PO4). Moreover, vegetation is to be mapped in groups.

Response: A total of 1,457m² of high ecological significance strategic areas containing native vegetation are proposed to be removed; with two dead/stag trees included in this total. A financial offset for those ultimately removed will be paid by the applicant. It is noted that the applicant will also further offset their impact through:

- The rehabilitation in Lots 7 and 8 with plantings consistent with the regional ecosystem and weed removal; and



- The provision of street trees in accordance with the Landscape Design Planning Scheme Policy, in addition to landscaping provided by individual landowners.

Advice

- 1) *It is noted the application requires public notification to be carried out in accordance with the Development Assessment Rules, upon responding to the information request. Further advice and information may be requested upon receipt of submissions received during the public notification period.*
- 2) *While an existing Pad Mount Transformer (PMT) is located near the south-eastern corner of the site, the proposal does not include space for an additional PMT. It is recommended to confirm whether another PMT is required to service the development.*

Response: It is confirmed that the PMT located at the southern end of the site will be sufficient to service the development site.

Summary

We offer this as a response to all of the information requested in Council's Information Request. As required by Section 14.1 (a) of the DA Rules, we advise that Council is to proceed with its assessment of the application.

In fulfilment of our obligations under Part 4 of the DA Rules, we will now arrange for public notification to be carried out for a period of 15 business days. Should any clarification be required, please contact me on (07) 3251 9441 or email at lewisbold@saundershavill.com.

Yours sincerely

Saunders Havill Group



Lewis Bold

Senior Town Planner / Associate Partner

