

WILLOWTREE PLANNING



1 September 2026

Ref: WTJQ24-061

Brisbane City Council
GPO Box 1434
Brisbane Qld 4001

Attention: Joel Wake

**RE: RESPONSE TO SUBMISSIONS – A006651694
51 CROSSACRES STREET, DOOLANDELLA (LOT 34 RP09234)**

Dear Joel,

Willowtree Planning acts on behalf of the Applicant in relation to the above development application. In accordance with Part 4 of the Development Assessment Rules (DA Rules), the public notification period for this application has now ended. The notification period ran from 5 August to 27 August 2026, and the Notice of Compliance was issued to Brisbane City Council on 28 August 2026.

According to Council's Development.i system, a total of seven (7) submissions were received during the notification period. These submissions have been reviewed, and the Applicant provides a response to the key matters raised as follows. The Applicant respectfully requests that Council have regard to this response in its assessment of the submissions.

TABLE 1. RESPONSE TO SUBMISSIONS	
Submitter Concern	Town Planning Response
Loss of vegetation and habitat on the Site	The Ecological Assessment Report shows that the vegetation patch is highly degraded and exhibits an unbalanced edge-to-internal habitat ratio. Small, isolated urban vegetation patches are severely limited in developing self-reliance and without active maintenance meaningful habitat is not achievable. Very few species have a functional core habitat requirement below one hectare, and as such the vegetation is not suitable habitat for small forest birds or larger fauna. The Site is bounded by residential subdivisions to the north, east and west, and by a busy road to the south and provides no meaningful ecological corridor or connection. Native vegetation landscaping and fauna-sensitive design measures will be incorporated where appropriate to soften the urban transition and minimise edge effects.
Removal of koala habitat	An assessment of the impacts of the removal of the koala habitat on the Site was undertaken by the State Assessment Referral Agency (SARA). As per SARA's response dated 20 June 2025, this vegetation was supported for removal.

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TABLE 1. RESPONSE TO SUBMISSIONS	
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Impact of reduced green space on the surrounding residential amenity	It is firstly noted the City Plan identifies this site as being intended for urban development and it is noted zoned for open or conservation space. Additionally, Figure a of the Doolandella Neighbourhood Plan Code identifies three (3) future parks within approximately 500m radius of the Site, which will provide publicly accessible greenspace to enhance the amenity of the neighbourhood.
No provision of communal open space or street trees	The proposed development is for a subdivision which is not required to provide communal open space. Furthermore, the Site is not known to be designated on Council's LGIP as being anticipated for a future park and/or open space area. Being a community title subdivision, the internal access will be in the form of a private driveway under body corporate management and not a public road. Therefore, street trees are not required.
Proposed density and consistency with the character for the area	As detailed in the Applicant's information request response dated 31 July 2026, there have been significant developments nearby which achieve a similar density to the proposal at: 43 Crossacres Street - 23.6 dwellings per hectare (A004488312) 63 Crossacres Street, Doolandella - 19.7 dwellings per hectare (A004231766) 89 Cloverdale Road, Doolandella - 18.7 dwellings per hectare (A005819019) 45 Redhead Street, Doolandella - 17.7 dwellings per hectare (A005348307) 53 Crossacres Street - 17.3 dwellings per hectare (A006134302) These approvals establish that the local character and density expectations in this part of Doolandella have evolved beyond the nominal density contemplated by the neighbourhood plan. The approved developments in the immediate vicinity reflect a density pattern that is broadly consistent with the proposed density and is considered to be suitable for the Site.
Potential impacts on privacy and amenity	The proposed development is for the creation of residential lots which will accommodate dwelling houses in a manner consistent with nearby properties. Each dwelling house design would be subject to assessment against the relevant assessment benchmarks (e.g., the Dwelling house code and/or Dwelling house (small lot) code) to ensure impacts are appropriately mitigated.
Potential for stormwater run-off issues	A Revised Civil Engineering Report and Stormwater Management Plan was submitted as part of the information request response dated 31 July 2026 to address these matters.
Lack of provision for street / visitor carparking	The proposed development is for the creation of residential lots which will accommodate dwelling houses in a manner consistent with nearby properties. Each dwelling house design would be subject to assessment against the relevant assessment benchmarks (e.g., the Dwelling house code and/or Dwelling house (small lot) code), including carparking, to ensure sufficient spaces have been provided.
Bin storage and collection	As part of the information request response dated 31 July 2026, the Applicant provided further detail on the proposed refuse collection arrangements. This included updated RCV swept paths and notations of bin locations for particular lots to demonstrate a suitable outcome.



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	It is noted bin storage and collection arrangements could be secured through conditions and/or formalised as part of the future community management statement/s for the body corporate.
Ability for the proposed development to be serviced by sufficient sewerage infrastructure	A Revised Civil Engineering Report and Stormwater Management Plan was submitted as part of the information request response dated 31 July 2026 to address these matters.
No provision of private fire hydrants	The Applicant submits this matter could be addressed through conditions, if required.

In summary, the Applicant maintains the proposed subdivision is suitable for the Site and that ecological and other impacts have been appropriately addressed. The Applicant submits the concerns raised in submissions do not warrant refusal of the application and respectfully requests that Council proceed to determine the application accordingly.

Should Council require any further clarification, please do not hesitate to contact the undersigned on 0400 012 722 or by email at brussell@willowtp.com.au.

Yours faithfully,



Ben Russell
Director – Queensland
Willowtree Planning Pty Ltd

