



Dedicated to a better Brisbane

12 June 2026

Doyen Planning Pty Ltd
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PO BOX 763
BULIMBA QLD 4171

ATTENTION: Rhianna Murphy

Application Reference: A006939586

Address of Site: 645 MT CROSBY RD MOUNT CROSBY QLD 4306

Dear Rhianna

RE: Further advice

Council has re-assessed the application as well as the information provided as part of the information request response. Whilst a number of items have been resolved as part of the response, there are outstanding concerns that are required to be addressed before the application is able to progress to a decision.

Bushfire hazard

1. Revised Bushfire Reporting was submitted to address items raised in Council's Information Request, however several items within the Bushfire reporting require amendment in order to demonstrate compliance with the Bushfire overlay code.

Figure 4 of the revised Bushfire Report identifies regrowth regional ecosystem (RE) 12.11.5 to the east and southeast of the proposed development, consistent with State mapping, and aligning with broad vegetation group (BVG) 10 and vegetation hazard class (VHC) 10.1 identified via the *Bushfire Resilient Communities* Mapviewer. This vegetation community and associated fuel load has not been reflected in Table 1 of the Bushfire Reporting, nor has ground-truthed assessment to verify the mapped community meets the classification of an alternative RE, VHC and associated fuel load.

Council's Information Request sought justification for the reduced flame width provided in the radiant heat exposure calculations. The revised reporting has not provided scientifically recognised method to justify a reduced flame width, instead measuring the width of the vegetated corridor, erroneously conflating flame *width* (i.e. the width of the head fire) with the width of a corridor parallel to the proposed development. Where any reduced flame widths are proposed these are required to be supported by quantitative information to support these inputs.

The Bushfire overlay code requires development to be designed to reduce vulnerability to bushfire attack and address bushfire hazard by providing a bushfire hazard assessment that demonstrates radiant heat exposure to development of $\leq 29\text{kW/m}^2$ (PO1). As outlined within the submitted Bushfire reporting, the assessment has been carried out in accordance with *Bushfire Resilient Communities* which allows practitioners to use either the QFES bushfire asset protection zone width calculator, or Method 2 assessment in accordance with AS3959-2018, subject to the adoption of certain parameters. This document states that for the purpose

of creating a 'fit for purpose' tool the QFES asset protection zone calculator adopts specific parameters, namely 1200K flame temperature. Whilst *Bushfire Resilient Communities* does not provide exhaustive list of standard parameters to be used where a Method 2 assessment (AS3959-2018) conducted, as is the case for this Bushfire Report, CB10.2 of the Australian Standard states *'the existing scientific literature suggests that flame temperatures for determining flame emissive power vary greatly and the majority of them fall within a range between 1000 K and 1200 K. An appropriate flame temperature is chosen from the above range in accordance with the minimum level of stringency or safety required by the relevant authority having jurisdiction'*. Written advice from QFES to Council advises that a flame temperature of 1200K is the appropriate temperature input to be used for Method 2 assessments, thus this should be reflected in radiant heat exposure calculations to be 'fit for purpose', aligning with the QFES asset protection zone calculator and meeting the requirements of the Bushfire overlay code.

Alternatively, use of the QFES Asset Protection Zone Calculator or conducting a Method 1 or Method 2 (AS3959) assessment using standard parameters set out in AS3959 is also acceptable.

- a) Provide revised Bushfire Reporting that is amended to reflect the presence of RE 12.11.5 (VHC10.1) or alternatively, further information in accordance with either section 6.2 of *Bushfire Resilient Communities* or a tertiary assessment as per the *Methodology for Survey and Mapping of Regional Ecosystems and Vegetation Communities in Queensland* (Neldner et al. 2022) to demonstrate an alternative classification of the RE, BVG and VHC and consequently the potential fuel load that is mapped by the State.
- b) Provide a revised radiant heat exposure assessment that addresses the items raised with respect to justifying a reduced flame width and the adoption of a flame temperature of 1200K. **Note:** Alternatively, other acceptable methodologies include the QFES Asset Protection Zone Calculator, or Method 1 or Method 2 (AS3959) assessment using standard parameters set out in the Standards.
- c) Where bushfire management measure will result in the removal of mature native vegetation and encroach into State Koala habitat areas or mapped areas of high ecological significance identified within the Biodiversity areas overlay code, an ecological assessment will be required including a tree survey plan identifying trees proposed for retention/removal within the bushfire management zone and demonstrates compliance with the *Planning Regulation 2017* (Koala habitat in SEQ Region) and Biodiversity areas overlay.

Should you wish to amend the application to resolve these matters it is recommended that you stop the current period by written notice in accordance with the Development Assessment Rules.

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

Yours sincerely



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Development Services
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