

Dear Brisbane City Council,

Please find attached my submission in relation to the Development application for 135 Caladium Street, Wakerley (Application Reference A006963905).

I am happy to discuss this further and can share a video of how the garbage truck navigates emptying bins in the Izzies Place cul-de-sac when a car parks there.

I would prefer my name and address is not made public on the developmenti webpage.

Many thanks

**Submission to Development application for 135 Caladium Street Wakerley
Lot 1 on RP79352
Application Reference A006963905**

Submission to Brisbane City Council

Application Reference: A006963905

Property Address: 135 Caladium Street, Wakerley QLD 4154 (Lot 1 on RP79352)

Proposed Development: Reconfiguration of Lot (13-Lot Subdivision)

While the need for infill housing to address local housing demands is understandable, development must be balanced against the sustainability and viability of local flora and fauna for future generations. Brisbane City Council's commitment to safe and liveable communities should be reflected in the decision on this proposal by prioritising two core principles:

1. Avoiding excessive and unnecessary ecological impact on the immediate and surrounding environment.
2. Supporting the Safety, Liveability, and Amenity of Existing and New Residents

Flawed Assumptions in the Application

Before examining these core principles, several key assumptions in the applicant's supporting technical documentation must be challenged:

- **Short-Term Ecological Assessment:** The ecological assessment relies on a brief, point-in-time survey (Spring 2025) that fails to account for seasonal variations, breeding cycles, or long-term wildlife usage within the corridor.
- **Encroachment Beyond Site Boundaries:** The proposal inappropriately assumes earthworks, scour remediation, and tree clearing can extend onto adjoining private property, including the proposed removal of 18 trees located outside the site boundary.
- **Unsubstantiated Assumptions Regarding Adjoining Lots:** The conceptual plans assume a neighbouring lot will be redeveloped at a similar or more intense density. This indicates possible further tree loss. There is no confirmation if the neighbouring owner is supportive of this. Any future intent to clear the wildlife corridor on adjoining land must be evaluated as part of the cumulative ecological impact of this development.
- **Disproportionate Tree Removal and Inadequate Offsetting:** The applicant proposes clearing 181 of the 271 trees on or around the site (approximately two-thirds). Offsetting this significant habitat loss through a financial settlement of \$184,552.92 fails to mitigate the immediate loss of local biodiversity, canopy cover, and ecological connectivity.
- **Restricting Corridor Retention to Overland Flow Paths:** Retained native vegetation is largely confined to areas already constrained by overland flow mapping under the Council's Flood Awareness Maps, rather than dedicated environmental buffers.

- **Ignored Secondary Microclimate Impacts:** The assessment neglects the broader impacts of tree canopy removal, such as increased urban heat island effects, altered hydrological flows, and exposed microclimates for the remaining vegetation buffer.

Principle 1: Avoiding excessive and unnecessary ecological impact on the immediate and surrounding environment.

Impacts on Native Fauna

The Wakerley Neighbourhood Plan (see Map A) identifies this property as an integral component of the local wildlife corridor, which serves as a critical linkage between habitats in the Bulimba Creek and Lota Creek catchments. “This corridor provides vital links between flora and fauna habitats in the Bulimba Creek and Lota Creek catchments” and “Ecological values and functions will be preserved and retained”.¹

- **Habitat Disruption:** Local residents regularly observe a wide variety of native fauna using and breeding within this corridor, including possums, brush-turkeys, carpet pythons, green tree snakes, blue-tongued lizards, kookaburras, purple swamphens, and various waterfowl.
- **Avian & Migratory Species:** The corridor supports numerous native bird species, as well as annual migratory species such as the channel-billed cuckoo, which are omitted or understated in the rapid assessment.
- **Koala Habitat Considerations:** A single snapshot survey in Spring 2025 is insufficient to determine Koala usage. Council should require data from tagged individual tracking or broader observational databases to properly assess habitat utilization. The Ecology Report itself notes:

“It should also be noted that the fauna component of the field survey was a rapid assessment that provides a ‘snapshot’ of the species present and detectable at the site at the time of the survey. The ecological survey was undertaken in Spring 2025 and therefore does not account for the full range of seasonal habitat utilisation by, or detectability of, every fauna species that may utilise the site, nor does it account for the influence of weather during preceding seasons or years upon the presence or detectability of fauna during the survey. Aquatic trapping surveys did not form part of the survey scope.”²

¹ Brisbane City Plan- Volume 1, The Wakerley Plan Chapter 4 page 352am, Effective 1 August 2008, <https://s3-ap-southeast-2.amazonaws.com/docs.brisbane.qld.gov.au/City%20Plan/City%20Plan%202000/1.%20Superseded%20Brisbane%20City%20Plan%202000%20document/1.6%20Chapter%204-%20Local%20Plans/1.6.5%20Local%20Plans%20for%20outer%20Suburbs/Wakerley%20Local%20Plan/Wakerley%20Local%20Plan.pdf>

² NewGround, Ecology Assessment Report, Reconfiguration of a Lot for Urban Purposes 135 Caladium Street, Wakerley, Qld (Lot1 on RP79352), prepared for Red Capital PTY LTD. Version 2, Dec 2025 page 11.

Impacts on Native Flora & Tree Canopy The proposal directly conflicts with the objectives of the Biodiversity Areas Overlay (High Ecological Significance, High Ecological Significance Strategic, and Koala Habitat subcategories).

There is a need to maintenance the aesthetic of the green tree scape along the road way. The Arborist report is a comprehensive assessment of the existing corridor and this proposal does not do justice to its analysis and notes:

*“Ninety (90) trees can be retained, comprising 56 on the subject site, 18 on neighbouring properties, 12 on the shared boundary and 4 within the road reserve”.*³

- **Loss of Mature Canopy:** Retaining only 56 trees on-site significantly reduces the established tree canopy and removes mature trees containing active nesting sites.
- **Streetscape Amenity:** Mature trees along the street fronts of Caladium Street and Basella Street contribute heavily to neighbourhood character and microclimate cooling. Work along kerbs and channels should be designed around tree retention where feasible.
- **Off-Site Boundary Disturbance:** The proposed southern boundary drainage infrastructure requires extensive tree removal on neighbouring land. As noted in the New Ground Ecology Assessment Report:

*“While tree retention along the southern site boundary has been maximised where practicable, the neighbouring trees and selected trees along the southern site boundary are still required to be removed to facilitate the construction of the proposed cut off drain From an engineering perspective, the cut off drain is required along the southern boundary to intercept and manage upstream surface water runoff. Accordingly, the disturbance extent shown on the amended Tree Retention Plan represents the **minimum area** necessary to accommodate the required drainage infrastructure. It is acknowledged that permission will be required from the relevant adjoining landholder prior to the removal of any trees located outside the subject site”.*⁴

Relying on off-site clearing to accommodate infrastructure indicates an over-development of the site boundary and establishes an unacceptable precedent for off-site environmental disturbance.

This proposal appears to adopt a path that maximises lot yields at the expense of clearing substantial vegetated areas, demonstrating a lack of genuine consideration for adjoining neighbours and the local community. Offsetting the loss of such a significant number of mature trees through a \$184,552.92 financial settlement provides no real disincentive against environmental destruction. Furthermore, relying on financial offsets directly undermines the intent of the Biodiversity Areas Overlay and its designations under the High Ecological Significance (HES), High Ecological Significance Strategic (HESS), and Koala Habitat subcategories.

³ Arbor Australis Consulting ,31/07/2026 2026-057-AIA-New Ground-135 Caladium St, Wakerly-Issue A , Pg 11

⁴ NewGround, Ecology Assessment Report, Reconfiguration of a Lot for Urban Purposes 135 Caladium Street, Wakerley, Qld (Lot1 on RP79352), prepared for Red Capital PTY LTD. Version 2, Dec 2025 page 2.

Stormwater and Hydrological Impacts

The Ecology Assessment Report states that *"broader hydrological or groundwater impact are unlikely but cannot be fully characterised without detailed hydrological assessment."*

- **Downstream Surface Runoff:** The Stormwater Management Plan proposes a lawful point of discharge into Basella Street. However, Basella Street currently experiences significant surface water buildup during high-rainfall events.
- **Increased Volume:** Replacing permeable vegetated land with dense residential lots and hardstand surfaces will increase runoff volume and velocity. Council must require a comprehensive hydrological assessment before considering any approval, ensuring that downstream drainage capacity is fully verified.

Requested Actions from Brisbane City Council

1. **Require a Comprehensive Seasonal Ecological Survey:** Direct the applicant to undertake multi-season fauna monitoring, including specific koala habitat assessment and aquatic/bird survey methodologies.
2. **Refine Site Layout to Eliminate Off-Site Boundary Disturbance:** Reject any proposal that relies on clearing trees or conducting drainage earthworks on adjoining private land.
3. **Increase On-Site Tree Retention:** Require the layout to be re-engineered to preserve mature hollow-bearing trees and maintain streetscape canopy along Caladium and Basella Streets.
4. **Commission an Independent Hydrological Study:** Ensure stormwater infrastructure on Basella Street can accommodate additional surface runoff without worsening local street flooding.

Principle 2: Supporting the Safety, Liveability, and Amenity of Existing and New Residents

1. Traffic Flow and Access Management on Caladium and Basella Streets

- **Driveway Density on Caladium Street:** The proposal should minimise direct driveway access points along the northern stretch of Caladium Street. Vehicles frequently accelerate upon exiting the nearby roundabout and traveling up the incline, leading to near-miss incidents at the intersection of Izzies Place.
- **Alternative Internal Road Design:** Reconfiguring the site layout to establish a dedicated public street or cul-de-sac connecting via Basella Street would provide safer vehicle access for the proposed lots. Incorporating central visitor parking within a cul-de-sac design, similar to established residential layouts in neighbouring Birkdale, would significantly improve local traffic flow and safety.

2. Off-Street Parking Capacity

- **On-Site Provision:** Due to restricted on-street parking options surrounding the site, each newly created lot must accommodate a minimum of two off-street parking spaces.

- **Local Transit Reliance:** Given Wakerley's location and the limited frequency of public transport services outside peak hours and on weekends, household vehicle ownership in the area is high. Insufficient on-site parking will inevitably result in unsafe overflow parking on narrow surrounding streets.

3. Public Transport Infrastructure & Pedestrian Safety

- **Bus Stop Placement:** The existing bus stops on both sides of Caladium Street serve key commuting and school transit routes. In their current configuration, stopped buses can obstruct sightlines and impede traffic flow.
- **Safety Upgrades:** Development approval should be contingent on providing a dedicated off-street bus indentation for the city-bound bus stop, ensuring clear sightlines and safe traffic movement during pickup and drop-off times.

4. Waste Services Access and Manoeuvrability

- **Easement Collection Concerns:** Utilizing a private easement driveway for refuse collection is impractical and poses operational hazards.
- **Turning Circle Infrastructure:** Heavy rigid vehicles already experience turning difficulties at the head of Izzies Place, particularly when vehicles are parked in the turning basin. The proposed turning allocation within the concept plan appears inadequate for standard Council waste collection vehicles.

Requested Actions from Brisbane City Council

1. **Reconfigure Vehicle Access:** Condition approval on reducing direct vehicle access points onto Caladium Street, requiring a consolidated internal access road or cul-de-sac connecting via Basella Street.
2. **Mandate Parking Standards:** Enforce a minimum requirement of two off-street parking spaces per lot, plus dedicated visitor parking within the subdivision footprint.
3. **Upgrade Bus Stop Facilities:** Coordinate with Translink to integrate a safe, indented city-bound bus stop into the streetscape design along Caladium Street.
4. **Require Swept-Path Analysis for Refuse Vehicles:** Mandate larger waste management turning circles so garbage trucks can enter and exit the site safely without relying on impractical private easement manoeuvres. Remember little children playing in and around the front of their homes and in driveways.

Map A: Wakerley

