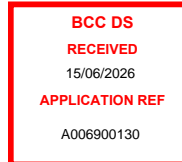


14 June 2026

Development Assessment
Brisbane City Council
GPO Box 1434
Brisbane Qld 4001



Dear Joel,

**RE: PROPOSED RECONFIGURING A LOT
AT 53 EVELYN ROAD IN WYNNUM WEST
COUNCIL REFERENCE NUMBER A006900130**

We would like to respectfully acknowledge the 2 submissions that have been received by Council, expressing opposition to the proposed development.

On behalf of the applicant, we would like to take this opportunity to address the concerns raised in these submissions.

Overdevelopment/consistency with the area

We acknowledge the concern raised regarding the density of the proposal and its consistency with the surrounding area.

We confirm that as part of the assessment process, the proposal has been revised to ensure that the 2 allotments facing Evelyn Road will have a minimum area of 406m² and a frontage more than 30m.

This means that the development presents to street in a form that exceeds the 400m²/10m width requirements, that apply to the surrounding Low Density Residential zoned properties.

Also, the proposal has been revised down from 20 to 15 lots. The number of allotments under 400m² has also been reduced from 15 to 3, the minimum lot size has been increased from 308m² to 339m², and the average lot size based on net developable area has been increased to 451.53m².

These changes ensure that the outcome is in keeping with other recent developments in the surrounding area. Including the 5 approvals referenced in the table over the page. All of which are within 550m of the site and have an approved yield greater than 1 per 400m².

As such, the submitter can be assured that the proposal is in keeping with the immediate and wider density outcomes.

Site address	Proximity to our subject site	Type of approval	Year of approval	Application number	Total site area (m ²)	Total number of units/lots achieved	Minimum lot size (m ²)	NDA (Net Developable Area)	Average lot size based on total site area divided by total number of lots (m ²)	Average lot size based on NDA divided by total number of lots (m ²)
146-150 Kianawah Road, Wynnum West	Approx 250m ²	Subdivision	Approved 9/8/2024	A006484936	2,024	4	394	2,024m ²	506.00	506.00
95-105 Ropley Road, Wynnum West	Approx. 370m	Subdivision	Approved 10/2/2021	A005624964	36,780	30	300	14,230m ² (excluding the 22,500m ² Environmental Protection Zone)	1,226.00	474.33
53 Evelyn Road, Wynnum West (Subject site)	Subject site	Subdivision	Ongoing application	A006900130	23,016	15	339	6,773m² (excluding the 16,243m² environmental area)	1,534.40	451.53
142 Kianawah Road, Wynnum West	Approx. 246m	Multiple dwelling	Approved 24/4/2018	A004690866	4,312	15	NA	4,312m ²	287.47	287.47
73 New Lindum Road, Wynnum West	Approx. 550m	Multiple dwelling	Approved 10/10/2014	A003844561	10,120	27	NA	6,194m ² (excluding the 3,926m ² EPZ area)	374.81	229.41
236-246 Kianawah Road, Wynnum West	Approx. 62m	Multiple dwelling	Approved 04/10/2012	A003401098	32,370	62	NA	19,294m ² (excluding the 13,076m ² EPZ area)	522.10	311.19

Precedence risk

In one of the submissions, concern was raised about whether this proposal would set a precedence for higher developments in the area.

Within planning, 'precedence' is not a concept recognised by the legislation. Rather, each site is assessed independently, based on its own constraints and merits against the legislation.

Therefore, the community can be assured that any development on this site won't automatically result in a snowball effect of change to the area. As the planning legislation does not allow for such.

Compliance with the flood overlay code

We acknowledge the concern raised regarding the potential for the development to worsen flooding on the site and the surrounding properties.

To address this, a detailed Stormwater Management Plan and Flood Impact Assessment has been prepared by Engeny Australia Pty Ltd (Engeny), a specialist hydraulic engineering firm.

Their assessment modelled flood behaviour across a range of storm events. From the more frequent 63% AEP through to the most severe 1% AEP. Noting that the percentage represents the chance of a flood event of that magnitude occurring every year.

The key findings of that assessment were:

- The development lots have been designed to be raised above the flood level, ensuring future residents will have flood immunity.
- A large detention tank has been incorporated under the raised building pads, to capture and slow the release of stormwater runoff from the site. Ensuring there is no net increase in peak flows leaving the site compared to the existing situation.
- The modelling confirms there is no increase to flood levels on any private property neighbouring the site.

As such, the community can be assured that the development has been specifically designed to ensure it does not worsen flooding for surrounding residents.

Vegetation loss

Concern has been raised over the loss of vegetation across the site. Given the zoning, the connectivity/corridor opportunities, and the value of the vegetation present, this is a valid concern.

The submitter is assured that this matter has been carefully considered as part of the application.

In particular, Raptor Environmental, a specialist ecology consultancy, carried out a detailed on-ground survey of every tree on the site. Assessing species, health, structure, and ecological significance, to inform which trees could be removed and which needed to be retained.

That process led to several important design outcomes.

In particular:

- The mapped Regional Ecosystem area in the southern portion of the site has been retained in full, sitting entirely outside the proposed works area.

- The trees proposed for removal within the development footprint are predominantly exotic species such as Slash Pine, Camphor Laurel and Brazilian Pepper Tree, alongside native trees assessed as dead, declining, or heavily impacted by vine infestation.
- Where removal of vegetation will result in an impact to mapped areas of ecological significance, the planning legislation requires a financial offset payment. In this case, that amount is \$178,365.51, payable to the Queensland Government to fund environmental restoration work elsewhere. This ensures the development results in a net environmental gain, not simply a loss.
- The balance of the site will be subject to a rehabilitation program, which includes the removal of invasive weed species and the replanting of native vegetation. This will significantly improve the overall ecological value of the retained vegetation area compared to its current condition.

As such, the community can be assured that this has not been treated as an afterthought. It has been the subject of detailed expert assessment, with the design adjusted accordingly.

Impacts to wildlife

The concern raised regarding impacts to wildlife, and koalas in particular, is noted.

We confirm that it is standard practice for Council to include conditions of approval on the subdivision approval addressing these matters.

Specifically, conditions requiring a licensed fauna spotter to be present on-site during vegetation clearing works, to ensure any wildlife is safely relocated before clearing commences. Also, the submission of detailed vegetation management and rehabilitation plan for assessment/approval via the operational works process, confirming how clearing and replanting will be carried out in practice.

As such, the community can be assured that the welfare of wildlife on the site will be appropriately managed throughout the development process.

Pedestrian safety

Concern has been raised regarding the creation of new vehicle access points and the potential for blind spots and conflict points on Evelyn Road.

In responding to this concern, we note that the development will result in a maximum of 3 access points onto Evelyn Road. This is based on the shared internal road servicing the majority of the lots, with the 2 street-fronting lots having the option to take direct access from Evelyn Road if they choose to do so at house design stage.

With a frontage of just over 90m, this equates to a maximum of 1 access point per 30m of road frontage. By comparison, the Low Density Residential zoned properties in the surrounding street network are permitted 1 access point per 10m of frontage. The proposal therefore results in an access point frequency that is $\frac{1}{3}$ of what is considered acceptable in the surrounding area.

In addition, a review of the road frontage confirms that it is free of obstructions such as street trees, bus stops, service pits and similar infrastructure. This means that sight lines for vehicles entering and exiting the site are clear, directly addressing the blind spot concern raised.

As such, the community can be assured that the access arrangement for this development will result in a safer outcome than what is typically expected and accepted in the surrounding area.

Traffic volumes

Traffic generation from the proposed development has been assessed by a specialist traffic engineer as part of this application.

A transport assessment has been prepared by Colliers, a specialist traffic engineering firm. Their assessment considered the traffic generated by the proposed 15 lots against the existing conditions on Evelyn Road and the broader road network.

Colliers confirmed that the projected traffic generation from this development falls well below the threshold at which a detailed traffic impact assessment is considered necessary. On that basis, they concluded that the development will not significantly impact the safety or operation of the surrounding road network.

As such, the community can be assured that the additional traffic generated by this development is considered low and acceptable under the relevant planning requirements.

Loss of street parking

Concern was raised over the availability of street parking around the development. Specifically, whether the proposal would result in overflow parking in Evelyn Road, which could then impact on availability of parking for the surrounding residents.

The Planning Scheme requires each site around the city to operate independently of public infrastructure.

That is, the scheme is written to require parking within the boundaries of each lot. So that the future dwellings do not need to rely on public infrastructure to operate.

Thus, allowing any public infrastructure like street parking to be used for bonus overflow purposes, in a shared arrangement with all nearby residents.

The future development of these lots will need to meet the requirements in the Dwelling House Code or Dwelling House (Small Lot) Code for this reason. I.e., to ensure that they can cater for their own parking within the lot boundaries, without resulting in unreasonable impacts on the surrounding network.

As such, the submitter can be assured that parking has been carefully considered, and the outcome will not result in unreasonable impacts on the surrounding street network.

Compliance with the bushfire overlay code

A Bushfire Management Plan has been prepared by Bushfire Risk Reducers.

The assessment identifies the vegetation to the south of the site as the primary source of potential bushfire attack. In response, the development has been specifically designed to incorporate a combination of protection measures, including a 12m bushfire buffer zone the rear of the lots most exposed to the hazard.

These measures ensure that the Bushfire Attack Level (BAL) for future dwellings does not exceed BAL 29, which is a manageable and well-established construction standard under the Australian Standard for construction in bushfire prone areas.

The Bushfire Management Plan demonstrates that the bushfire risk can be managed to an acceptable level through the combination of site design, construction requirements, and ongoing management measures proposed.

As such, the community can be assured that the bushfire risk has been carefully assessed by a qualified specialist, and the development has been designed to appropriately manage that risk.

Summary

The above provides a technical response to the key concerns raised in the submissions.

Should you have any queries regarding this response please do not hesitate to contact me on 3113 3261.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'P. Charles', enclosed within a thin black oval border.

Peta Charles
Principal Planner