



9 March 2026

Brisbane City Council

Planning Services South, Development Services

Attn: Justin Lynham

[Address Line 1]

E: Justin.lynham@brisbane.qld.gov.au

Re. Response to Information Request from Brisbane City Council for Development Application A006938065 on land at 58 Crossacres Street, Doolandella QLD 4077

Dear Justin,

28 South Environmental has been engaged by ADC Group No 14 Pty Ltd C/- JFP Urban Consultants to provide ecological and environmental planning services in support of a Development Application for a Reconfiguring a Lot (RoL) (1) lots into 21 lots (**Proposed Development**) (A006938065). The Proposed Development is located at 58 Crossacres Street, Doolandella, formally described as Lot 44 on RP90234 (hereafter referred to as 'the **Site**').

This Information Request Response (**IRR**) has been prepared to address ecologically relevant items from BCC's Information Request issued on 10 February 2026 (**Attachment 1**) in relation to the Proposed Development.

Item 1 – Significant Vegetation Retention

1. It is acknowledged the application has included a Subdivision Plan, Engineering – Filling and Excavation Plan and Tree Retention Plan. The site is wholly overlaid with the Natural Assets Local Law - Significant Urban Vegetation and Significant Native Vegetation. The submitted plans and documents indicate that all existing onsite vegetation is proposed to be removed to facilitate the proposed development including the earthworks – cut and fill and construction of retaining walls. An assessment of submitted documents and review of aerial imagery confirms that this site features existing trees that are considered to be Significant Vegetation as they meet one or more criteria as Significant Vegetation within the Vegetation planning scheme policy (VPSP).

Specifically, Trees 412 (Delonix regia) and 413 (Jacaranda mimosifolia) near the Crossacres Street frontage are considered to be Significant Vegetation due to their visual prominence and discernible size, form and position in the landscape and their contribution to local landscape character and sense of place and the provision of amenity, shading and cooling. Furthermore, Tree 426 (Corymbia henryi) located on the western property boundary is proposed for retention as Significant Vegetation, with amended earthworks as part of the development application - A006831357 for the neighbouring site at 66 Crossacres Street, Doolandella. The proposed development layout and earthworks for this site and development is to be revised to facilitate the retention of Trees 412 (Delonix regia), 413 (Jacaranda mimosifolia) and Tree 426 (Corymbia henryi).

In accordance with PO1, PO2 and PO19 of the Subdivision code; PO2 of the Filling and excavation code; and the VPSP, submit a revised Subdivision Plan, Engineering – Filling and Excavation Plan and Tree Retention Plan which illustrate:-

- a. Amendments to the proposed lot layout, earthworks cut and fill and location and design of proposed retaining walls to allow for the retention of existing significant vegetation on the site identified as Trees 412, 413 and 426 through appropriate development design, layout, construction and operational measures and methodology; and*

Response to Item 1

It is acknowledged that Council has identified Trees 412, 413 and 426 as Significant Vegetation under the Vegetation planning scheme policy (**VPSP**) and the *Natural Assets Local Law 2003 (NALL)*. As such, consideration of this matter is more appropriately addressed at later stages of development and is not relevant to the determination of this development application. The assessment herein is therefore appropriately limited to the relevant provisions of the City Plan.

From an ecological perspective, the Site is highly disturbed and currently functions as a plant nursery. The vegetation present is fragmented, cultivated and managed within an urban context and does not form part of any mapped ecological corridor, remnant vegetation patch or meaningful stepping stone habitat. The site is surrounded by established and emerging urban development, resulting in a high level of edge effects and negligible landscape connectivity. Consequently, the existing vegetation does not provide habitat values of ecological significance.

The Ecological Assessment Report confirms that the onsite trees, including Trees 412, 413 and 426, provide minimal fauna habitat value and are unlikely to support anything beyond common urban-adapted species. The vegetation does not contribute to landscape-scale biodiversity outcomes, and its removal will not result in a measurable ecological impact.

Importantly, Trees 412, *Delonix regia* (Poinciana) and 413, *Jacaranda mimosifolia* (Jacaranda) are both non-native ornamental species. These species do not represent locally native vegetation communities, nor do they provide specialised habitat values. As such, the vegetation across the Site is best characterised as amenity and landscape planting rather than ecologically significant vegetation. Further, Tree 413 (*Jacaranda mimosifolia*) is identified by Brisbane City Council as pest vegetation under the Natural Assets Local Law framework, and Tree 412 (*Delonix regia*) is widely recognised as an environmental weed in Queensland. The retention of these non-native species does not deliver a positive ecological outcome and is not necessary to maintain biodiversity values. Their removal will, therefore, assist in preventing the continued spread of weed species and will enable the establishment of more appropriate landscaping and vegetation that better supports long-term ecological and landscape outcomes.

The Proposed Development provides opportunity for replacement planting using locally appropriate native species selected to optimise urban ecological outcomes, including species known to provide improved foraging resources (including winter-flowering and fruiting species) and structural diversity compared to the existing vegetation. Over time, this will deliver a more structured and ecologically purposeful urban planting outcome than the existing cultivated vegetation.

Accordingly, the Proposed Development including vegetation removal and landscaping, will not result in a residual ecological impact, and remains consistent with the ecological intent of PO1, PO2 and PO19 of the Subdivision code and PO2 of the Filling and excavation code. Landscape retention, design response and arboricultural matters are appropriately addressed under separate cover by the Landscape Architect and Project Arborist.

We trust this information addresses all relevant elements of the Information Request. If you have any further questions, please don't hesitate to contact the undersigned.

Kind regards,

Abi Kinnaird
Graduate Environmental Planner
E: abi@28south.com.au

Chris Johnston
Senior Environmental Planner
chris.j@28south.com.au

List of Attachments

Attachment 1 – BCC Information Request

Attachment 1 –
BCC Information
Request



Dedicated to a better Brisbane

10 February 2026

ADC Group No 14 Pty Ltd
C/- JFP Urban Consultants Pty Ltd
PO Box 3634
SOUTH BRISBANE QLD 4101

ATTENTION: James Collie

Application Reference: A006938065
Address of Site: 58 CROSSACRES ST DOOLANDELLA QLD 4077

Dear James,

RE: Information request in accordance with the Development Assessment Rules

Council has carried out an initial review of the above application and has identified that further information is required to fully assess the proposal.

Significant Vegetation Retention

1. It is acknowledged the application has included a Subdivision Plan, Engineering – Filling and Excavation Plan and Tree Retention Plan. The site is wholly overlaid with the Natural Assets Local Law - Significant Urban Vegetation and Significant Native Vegetation. The submitted plans and documents indicate that all existing onsite vegetation is proposed to be removed to facilitate the proposed development including the earthworks – cut and fill and construction of retaining walls. An assessment of submitted documents and review of aerial imagery confirms that this site features existing trees that are considered to be Significant Vegetation as they meet one or more criteria as Significant Vegetation within the Vegetation planning scheme policy (VPSP).

Specifically, Trees 412 (Delonix regia) and 413 (Jacaranda mimosifolia) near the Crossacres Street frontage are considered to be Significant Vegetation due to their visual prominence and discernible size, form and position in the landscape and their contribution to local landscape character and sense of place and the provision of amenity, shading and cooling. Furthermore, Tree 426 (Corymbia henryi) located on the western property boundary is proposed for retention as Significant Vegetation, with amended earthworks as part of the development application - A006831357 for the neighbouring site at 66 Crossacres Street, Doolandella. The proposed development layout and earthworks for this site and development is to be revised to facilitate the retention of Trees 412 (Delonix regia), 413 (Jacaranda mimosifolia) and Tree 426 (Corymbia henryi).

In accordance with PO1, PO2 and PO19 of the Subdivision code; PO2 of the Filling and excavation code; and the VPSP, submit a revised Subdivision Plan, Engineering – Filling and Excavation Plan and Tree Retention Plan which illustrate:-

- a. Amendments to the proposed lot layout, earthworks cut and fill and location and design of proposed retaining walls to allow for the retention of existing significant vegetation on the site identified as Trees 412, 413 and 426 through appropriate development design, layout, construction and operational measures and methodology; and
- b. Where works are proposed within the TPZ of significant vegetation to be retained, a Arboriculture Impact Report - Vegetation Management Plan from a qualified arborist (AQF level 5 Arboriculture) will be required to document the impacts of development on vegetation to be retained and ensure the works will not adversely affect the long-term health of the trees.

Arboriculture Impact Report - Vegetation Management Plan

2. In accordance with the Vegetation planning scheme policy and Infrastructure design planning scheme policy (Chapter 1), provide an Arboriculture Impact Report – Vegetation Management Plan (AIR-VMP) to assess the impacts of the proposed development on the vegetation to be retained. The AIR-VMP is to be prepared in accordance with AS 4970:2025 by a suitably qualified and experienced person with minimum AQF Level 5/Diploma in Arboriculture and at least 5 years post graduate experience in arboriculture. The AIR-VMP is to include the following:-
 - a. Botanical species name of trees;
 - b. Height, diameter of tree trunk at breast height and crown diameter;
 - c. General health assessment and character of trees;
 - d. Identification and illustration of the Tree Protection Zones (TPZ) and Structural Root Zones (SRZ) of trees in accordance with AS 4970:2025;
 - e. Recommendations, including discussion of all options and the rationale for selection of a preferred option;
 - f. Description of the proposed works and construction methodology to be used within TPZ of trees to be retained;
 - g. Evaluation of proposed construction methodology and potential impacts on the trees to be retained;
 - h. Evaluation of any pruning works (including canopy and/or root pruning) which may be required as a result of the proposed works; and,
 - i. Tree protection measures as required and relevant supporting evidence such as photographs, test results and statements where appropriate.

Waste Collection

3. A review of the proposed plans notes that kerbside presentation areas for Lots 8, 9 and 10 is constrained due to the shared driveway and positioning of the arm of the Refuse Collection Vehicle (RCV).

In accordance with PO4/AO4.1 of the Subdivision code and PO8/AO8.1 & AO8.2 of the Infrastructure design code provide amended subdivision plans to demonstrate the following;

- a. A compliant presentation area of 1.8m per lot for Lots 8, 9 and 10 or a relevant Performance outcome; and
- b. Ensure the bins are located in a position which can be reached by the RCV arm.

4. It is noted that the development application has not included a Registered Professional Engineer of Queensland (RPEQ) certified swept path analysis to demonstrate that safe and efficient on-site servicing can be undertaken.

In accordance with PO4/AO4.1 & PO9/AO9 of the Subdivision code and PO19/AO19.2, AO19.3 of the Transport, access, parking and servicing code, provide the following:

- a. A RPEQ certified swept path analysis for a 10.3m Side Loading RCV (as per BSD 3004) which demonstrates safe and efficient servicing and use of the Offset T head facilities, whilst utilising a kerb-to-kerb turning radius of 9.757m and a lock-to-lock time of 6s. Ensure the kerb-to-kerb turning radius is included in the vehicle specification legend. Demonstrate that the side arm of the RCV can reach all mobile garbage bins.

Traffic

5. It is noted the development creates a new four-way intersection at Road 1, Paddington Street and Grove Street. While the current Brisbane Standard Drawings imply this should be a stop intersection, the use of Stop signs where visibility is not significantly limited is contrary to the Queensland Manual of Uniform Traffic Control Devices and general design intent. Give Way signage should be used in these instances for new roads and compliant sightlines.
 - a. Provide amended plans to show the intersection line marked and signed to reflect Give Way control on Grove Street and Road 1.
6. The termination of Road 2 shows a slightly non-standard variation of a standard offset T head turnaround area with reduced pavement width and the length of 'Road 3'. This will need to be amended since the dimensioning is critical to facilitate the manoeuvring of the RCV.
 - a. Provide amended plans that show the termination of Road 2 to reflect a standard offset T head as per BSB 3001 sheet 2 of 2.
7. The Crossacres Street frontage is mapped as a Neighbourhood Street minor street within the Streetscape hierarchy overlay code and is required to provide a minimum 3.75m wide verge width. It is unclear if the site frontage provides a minimum 3.75m wide verge width to allow for the delivery of Neighbourhood Street minor streetscape works that provide a high-quality subtropical streetscape with a strong pedestrian and amenity focus.

In accordance with PO1/AO1 of the Streetscape hierarchy overlay code, provide amended plans that:-

- a. Clearly illustrate the nominal face of kerb for the full length of the Crossacres Street frontage of this lot to identify the existing verge width;
- b. Provide the necessary area as land dedication to achieve a 3.75m verge width for the full length of the Crossacres Street frontage; and
- c. Annotate the area to be provided as land dedication as 'new road - verge widening'.

Building Location Envelopes

8. It is noted the Building Envelope Plan includes proposed rear setbacks for lots 7, 6, 8, 9, 14 and 15 which do not appear to comply with the acceptable outcome of the Dwelling house small lot code.
 - a. Provide an amended Building Envelope Plan that includes compliant rear boundary setbacks (3m to 4.5m for lots with an average depth of 25m or less and 6m for lots with an average depth over 25m in depth).

Infrastructure Charges

9. It is acknowledged that the application details the existing use of the site is a Garden Centre as shown on the submitted drawing B4687SA1DA7. The information supplied is insufficient to determine the applicable Demand Credit for the infrastructure charges notice and the following additional information is required:

a. Accurately measured and nominated Gross Floor Area (GFA)

Consult the Brisbane Infrastructure Charges Resolutions 14 (BICR 14) for guidance on the definition of chargeable GFA prior to submitting plans with more detail. For example, greenhouses do not appear to constitute a storey, as the covering functions more like a barrier than a ceiling. Evidence of a defined floor level is required.

b. Accurately measured existing impervious area

Note that gravel surfaces do not constitute impervious area under BICR14. Submit details of the existing lawful uses on the site by completing Prescribed Form B, found on Council's website. The prescribed form must be supported with sufficient evidence.

Urban Utilities (UU)

Council does not undertake water and sewer assessment of any planning applications. Contact UU on (07) 3432 2200 to discuss any water and sewer issues and whether you are required to submit an application to UU for assessment.

Responding to this request

Your response should include a summary table which outlines any changes to performance outcomes and plans that have resulted from addressing the issues outlined above. The table should also include details of any supporting documentation.

If a response is not provided within the prescribed response period of three (3) months assessment of the application will continue from the day after the day on which the response period would have otherwise ended.

Email your response to DSPlanningSupport@brisbane.qld.gov.au quoting the application reference number A006938065.

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

Yours sincerely



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Development Services
Brisbane City Council