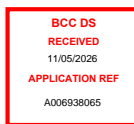


11 May 2026

Job Ref: B4687-A1-DA7

Brisbane City Council
GPO Box 1434
BRISBANE QLD 4001



Att: Development Services (Justin Lynham)
via DSPlanningSupport@brisbane.qld.gov.au

Response to Information Request – 58 Crossacres Street, Doolandella QLD 4077 – Council Ref: A006938065

Dear Justin,

We refer to Council's Information Request dated 10 February 2026 regarding the abovementioned application.

In accordance with s13.2 of the *Development Assessment Rules*, we hereby provide all of the information requested. In support of our response, please find **enclosed** the following documents for assessment:

| | |
|----------------------|--|
| Attachment A. | Updated Engineering Concept Plans prepared by JFP Urban Consultants |
| Attachment B. | Updated Reconfiguration Plan prepared by JFP Urban Consultants |
| Attachment C. | Updated Building Envelope Plan prepared by JFP Urban Consultants |
| Attachment D. | Swept Path Analysis prepared by Lambert & Rehbein |
| Attachment E. | Updated Tree Retention Plan prepared by JFP Urban Consultants |
| Attachment F. | Information Request Response (Environmental) prepared by 28° South Environmental |

In response to the request, and as further detailed below, we note that the proposed development has been amended as follows:

1. A pad-mounted transformer (PMT) has been provided over Lot 8 at the site's frontage to Crossacres Street and adjoining the pathway as per Energex requirements. The boundaries of Lot 8 and its building envelope have been amended to facilitate the PMT site and the associated buffers.
2. The earthwork levels and retaining walls for Lot 1 has been amended to minimise interference with Tree 426 which is now identified for retention.
3. Refuse collection areas have been updated ensuring they can all be safely collected by Council's Refuse Collection Vehicle (RCV).
4. The intersection lines at the intersection of the new road with Paddington and Grove Streets have been amended from Stop to Give Way control.

In accordance with Schedule 2 of the *Planning Act 2016* (the Act) and Schedule 1 of the *Development Assessment Rules*, we confirm that the above changes do not:

- result in a substantially different development;
- seek approval for prohibited development;
- require the application to be referred to any additional referral agencies;

- change the type of development approval sought; or
- require impact assessment for any part of the changed application, if the original application did not involve impact assessment.

Our responses to the outstanding issues are as follows:

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.

Response

Trees 412 and 413 are unsightly weed species that are impractical to be retained due to their location well within proposed lots and their invasive nature, the latter is also a declared pest species under BCC's Natural Asset Local Law. As per Council's request, the earthworks and retaining walls in Lot 1 have been redesigned to minimise interference in the Tree Protection Zone (TPZ) of Tree 426 which will be retained.

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.

Response

Tree 426 on the enclosed updated Tree Retention Plan is identified for retention, and the layout has been redesigned around proposed Lot 1 to ensure minimal interference to the TPZ of that tree as per the enclosed Arborist Statement prepared by JFP Urban Consultants.

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.

Response

Please refer to the enclosed updated Engineering Concept Plans prepared by JFP Urban Consultants and Swept Path Analysis prepared by Lambert & Rehbein which demonstrate compliant kerbside bin presentation areas for lots 8, 9 and 10 that 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.

Response

Please refer to the enclosed Swept Path Analysis prepared by Lambert & Rehbein which demonstrates the above requirements, including the ability for the RCV to 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.

Response

Please refer to the enclosed updated Engineering Concept Plans prepared by JFP Urban Consultants which shows the intersection lines marked and signed as Give Way control at the intersection of 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.

Response

Although the proposed T-head does not accord with Council's requested arrangement, the originally proposed extended shared pavement has been maintained. The enclosed Swept Path Analysis prepared by Lambert & Rehbein demonstrates that a refuse truck can safely undertake a turnaround over that area.

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'.

Response

The existing verge profile along the site's frontage to Crossacres Street is less than 3.75m along the extent of the interim basic right turn (BAR) solution at the Avington Street intersection which is to be retained until the ultimate upgrades to Crossacres Street are carried out. This reduced verge predominantly occurs at the frontage of 66 Crossacres Street and the Applicant for the development over that site is proposing no changes to the Crossacres Street verge profile. The reduced verge and interim BAR solution was approved as part of Operational Works associated with the constructed development at 63 Crossacres Street which was designed to enable all future road widening to occur along the northern side of Crossacres Street, including a $\geq 3.75\text{m}$ wide verge on both sides of Crossacres Street (BCC ref: [A004472639](#)). Although the widening of Crossacres Street is not listed as an item under the current Local Government Infrastructure Plan (LGIP), there is and will be more than sufficient road reserve area to the north that can be utilised for future widenings and upgrades as required, taking into consideration the land dedicated for road reserve when the upgrades to Crossacres Street were listed as a trunk item and the land dedications yet to be undertaken. We note that in recent applications to the north of Crossacres Street, Council have been setting aside the land required for future road widening as not-to-prejudice road widening area, for example in the approved and constructed development over 53 Crossacres Street (BCC ref: [A006134302](#)). Setting aside land as not-to-prejudice road widening area is typically conditioned by Council when the future widening of a trunk road is not required under a current LGIP. As such, we encourage Council to dedicate not-to-prejudice road widening areas to the north of Crossacres Street as road reserve if necessary.

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).

Response

It is noted that rear boundary setbacks do not apply as the site has dual road frontages to Crossacres Street to the north and Paddington Street to the south. As such, the development proposes side boundary setbacks to the site's side boundaries.

The application of rear setbacks to the western boundaries of lots 6, 7 and 8, the eastern boundary of lot 9 and 6m rear setbacks to lots 14 and 15 will not provide flexibility for the Applicant to deliver more affordable housing product (e.g. single storey product) as the already constrained lot dimensions will be further constrained because of the limited available buildable area that can hinder the delivery of the Applicant's affordable product options. In the case of Lot 8, its buildable area is further inhibited by Energex's requirement to provide a pad-mounted transformer (PMT) on the site. To accommodate the Applicant's preferred housing product whilst providing the requested setbacks, this will require the application of lesser road setbacks to the new road, a solution that is less desirable from Council's perspective. Should Council's requested setbacks apply to the lots in question, this will require the Applicant to construct 2 storey dwellings which have lesser depths but are significantly more expensive to build. In a time of a housing and affordability crisis, limiting building envelope areas in a way that requires a builder to deliver costlier product does not assist in alleviating the housing and affordability crisis. We also note that the average depths of lots 14 and 15 are greater than the 25m depths observed by adjoining lots because of a minor protrusion of these lots to the west. This protrusion is small, irregularly shaped and unlikely to be built over as the front building line of the Applicant's housing product is typically 2.5m in front of the garage building line as per the Dwelling House (Small Lot) Code. The garage and rear setbacks of lots 14 and 15 are in line with those observed by adjoining lots. Applying 6m rear setbacks to those lots will result in a significant and unnecessary reduction in buildable area that complicates the ability to provide affordable housing product.

In lieu of the requested setbacks, the originally proposed building envelopes will remain unchanged for reasons cited above other than the necessary reduction in Lot 8's BLE area to accommodate the required PMT. Lots 6 and 7 have corner frontages and lots 8 and 9 have their secondary road frontages to Crossacres Street and their primary frontages to the new road reserve. As the dwellings over lots 14 and 15 will be built in line with the dwellings over lots 10-19, rear setbacks consistent with those lots (3m-4.5m) are more appropriate in this instance. The proposed building envelopes allow for the provision of compliant private open space areas and landscaping throughout the lots; indicative 16m² private open space areas are provided over all lots subject to BLEs to demonstrate that compliant open space areas can be provided. We also note that the proposed setbacks are unlikely to have any privacy and amenity impacts on the adjoining sites to the east and west. The dwellings on the site to the east are well screened by a strip of established landscaping; the site to the west will contain a Child Care Centre where adjoining proposed lots 6-8 and the Child Care Centre proposes a 4m wide deep planting area along its eastern boundary. The proposed setbacks allow for the provision of sufficient natural light, sunlight and breezes to habitable rooms and open space areas. All things considered, the proposed building envelopes will comply with all relevant Performance Solutions in the Dwelling House (Small Lot) Code.

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.

Response

As requested, the calculated Gross Floor Area (GFA) is 362m² and the calculated impervious area is 2320m².

This correspondence and attachments represent a response to all the information requested, in accordance with s.13.2 of the *Development Assessment Rules*. We trust the above and enclosed information satisfactorily addresses the request and we look forward to receiving Council's draft conditions following public notification of the application. Please do not hesitate to contact the writer on 07 3012 0100 should you have any questions.

Yours faithfully,



JAMES COLLIE

TOWN PLANNER

JFP URBAN CONSULTANTS