



Dedicated to a better Brisbane

16 April 2026

Tree Garden Pty Ltd ATF Natasa Family Trust
C/- Town Planning Alliance
PO Box 7657
EAST BRISBANE QLD 4169

ATTENTION: Claudia Heiner

Application Reference: A006976128
Address of Site: 216 LEAROYD RD WILLAWONG QLD 4110

Dear Claudia,

RE: Information request in accordance with the Development Assessment Rules

Council has carried out an initial review of the above application for a Relocatable home park (10 sites) (Stage 1) and 1 into subdivision (4 lots) with new road (Stage 2). The temporary access to the relocatable home park is supported in principle, however the proposed stage 2 Reconfiguration of a lot cannot progress until public road access is available from the site to the east. **The subdivision component is considered premature due to the reliance of the access through the adjoining site** at 210 Learoyd Road (A006739543), which is currently under assessment. It is recommended that the subdivision component (Stage 2) be removed from the current application and a separate application for ROL be lodged at a later date. Notwithstanding this, the submitted application as lodged has been assessed and requirements for any future ROL component are also provided below.

Subdivision Permit

- 1) A temporary access is proposed onto Learoyd Road until the permanent connection is established via the southern end of the development. This arrangement is supported in principle. The Stage 2 subdivision component is considered premature due to the reliance of the access through the adjoining site at 210 Learoyd Road (A006739543), which is currently under assessment. It is unclear when and if this development would be delivered to provide access. It is recommended that the subdivision component of the development is removed from the development until appropriate road access to the site is provided.
 - a) Remove the proposed Subdivision component of the development until an alternative public road access is provided.

Number of dwellings

- 2) The site has 10 proposed relocatable homes, however the submitted floor plan appears to show 2 dwellings per site. The definition of 'dwelling' as per *City Plan 2014*:

Dwelling means all or part of a building that—

- a. is used, or capable of being used, as a self-contained residence; and*
- b. contains—*
 - i. food preparation facilities; and*
 - ii. a bath or shower; and*
 - iii. a toilet; and*
 - iv. a wash basin; and*
 - v. facilities for washing clothes.*

Consequently, the development is considered to have 20 dwellings. This has implications for the minimum site area, parking spaces, private open space and frontage widths required as per AO2.2 of the Tourist park and relocatable home park code.

- a) Provide amended plans decreasing the number of dwellings on the site to comply with the areas set out in AO2.2 of the Tourist park and Relocatable home park (TPRHP) code.
- b) If the number of dwellings on the site is over the proposed 10 RHP sites, demonstrate compliance with AO2.2/PO2 TPRHP code and ensure appropriate car parking spaces are provided in accordance with AO13 of the Transport, access, parking and servicing (TAPS) code. Whilst also ensuring, parking areas, private open space, site areas comply with AO2.2 of the TPRHP code.
- c) Clarify whether the caravan parking sites are only for additional parking for residents caravans or if these spaces are for habitable dwellings.

Community House

- 2) Clarify the need to provide a laundry and shower within the communal shared facilities of the Community House, as this does not provide passive and active recreation areas for park residents in accordance with AO9.3/PO9. It is considered that each RHP site would be self contained and there is no need for additional shower and laundry facilities .

Biodiversity Areas

- 3) It is acknowledged that 230m² of rehabilitation is proposed in areas not mapped under the Biodiversity areas overlay with vegetation planted within the proposed bushfire management zone (BMZ). The co-location of spaced canopy trees in the HES mapped area and the BMZ does not achieve the full strata rehabilitation and restoration outcomes required by PO4 of the Biodiversity areas overlay code. To reduce the encroachment of the BMZ and associated impacts to HES, the removal of Lot 3 from the proposed plans is required.
 - a) Provide an amended site layout plan for Stage 2 that reduces encroachment into mapped HES by removing proposed Lot 3, ensuring that it avoids co-locating HES mapped vegetation within the BMZ.
 - b) Provide an amended Concept Rehabilitation Plan demonstrating full strata rehabilitation of all areas of mapped HES being retained.
- 4) A Tree Retention & Removal Plan (TRRP) has been provided, however the plan does not clearly delineate which vegetation is impacted in each stage (i.e. sewer and stormwater alignment for Stage 1) and does not identify engineering detail for the proposed Stage 2 lots (i.e. cut/fill for building pads, proposed sewer connections, road extent etc). The plan is to identify the full extent of proposed impacts to vegetation for each stage of works.
 - a) Provide an amended Tree Retention & Removal Plan for each stage (which incorporates any required changes) that includes the following:
 - i) The proposed site plan (as an overlay) including full extent of works (i.e. road construction, earthworks, sewer and stormwater infrastructure etc.) on site for both the MCU and ROL permits and external to the site for each proposed stage of development
 - ii) The proposed vegetation retention/removal associated with each stage of development.
 - b) If works encroach into the TPZs of any trees identified to be retained, a report from a qualified arborist (minimum AQF level 5 Arboriculture) is required to demonstrate no negative impacts on the long-term health of the trees.

Environmental offsets

- 5) The submitted Ecological Assessment Report (EAR) indicates no environmental offsets are proposed, however environmental offsets will be applicable for any portion of revised development which impacts upon native vegetation within the Biodiversity areas overlay.

Detail on the proposed area of impact and associated offsets must be provided in accordance with the PO9 of the Biodiversity areas overlay code, the Offsets PSP and *Environmental Offsets Act 2014*. The Environmental Offset Strategy must distinctly outline the offset requirements for each stage of the proposed development (i.e. services installation for Stage 1 etc.)

Note: Onsite restoration works do not contribute to offsets as it is a separate requirement of the Biodiversity areas overlay code (PO4), however rehabilitation of non-mapped HES areas may contribute to an overall reduction in the offset amount for Stage 2 only.

- a) Provide an Offset Delivery Strategy that confirms the total impact area to be offset (noting changes required to retention of vegetation), in accordance with PO9 of the Biodiversity areas overlay code and the Offsets PSP.
 - i) Provide a plan for each stage of the proposal clearly identifying the existing HES Biodiversity areas overlay, together with the extent of development footprint impacting upon mapped areas associated with each stage (e.g. development areas, roads, building envelopes, service alignments and access for construction works) and any proposed reductions of mapped area to determine the area of impact. These may include existing dwelling and curtilage, lawns, landscape gardens, cleared areas and areas dominated by exotic weeds (vegetation is to be mapped in groups);
 - ii) Residual impacts must be offset using MLES3;
 - iii) Amendments to site layout as detailed above are to be incorporated to reduce area of impact;
 - iv) Restoration works are required by the Biodiversity areas overlay code.

State Koala

- 6) Provide a Koala Management Plan demonstrating compliance providing an assessment against Schedule 11, Part 3, Section 6 of the *Planning Regulation 2017* benchmarks for development in an 'Identified koala broad-hectare area'.

Bushfire hazard

- 7) A Bushfire Hazard Assessment and Management Plan (BMP) was submitted to comply with Sections A, C and D of the Bushfire overlay code, however the BMP does not address Stage 1 of the proposal. The Town Planning Report indicates the Stage 1 relocatable home park is intended to operate as a permanent base for long-term residents, serving as their principal place of residence while they otherwise travel in caravans or motorhomes. The BMP must ensure the correct BAL setbacks for the proposed use are in accordance with PO1 of the Bushfire overlay code, clearly identifying if the use is considered vulnerable or difficult to evacuate.
 - a) Provide updated bushfire reporting in accordance with Bushfire Reporting and hazard assessment guidelines available within the technical assessment guide (bushfire reporting) on Council's website for Stage 1 of the proposal, ensuring any vulnerable or difficult to evacuate uses are clearly identified and incorporated.
- 8) The development is to provide alternative egress routes having regard for the most likely bushfire scenarios in accordance with PO18 of the Bushfire overlay code. The proposed plans indicate the temporary access onto Learoyd Road will be replaced by future Site 10 once the Stage 2 road is constructed, resulting in primary egress being directed towards the identified bushfire hazard area and via the Waters Street roundabout. Both Stage 1 and Stage 2 of the proposal do not provide an alternative access/egress route with a safe and efficient emergency services access to sites and manoeuvring, does not provide safe and efficient movement of emergency services and does not provide ongoing availability and maintenance of access and egress routes for the purposes of evacuation and emergency services access in accordance PO17 and PO18 of the Bushfire overlay code.
 - a) Demonstrate an alternative access/egress and appropriate turnaround areas for emergency service vehicles for both Stages 1 and 2 of the proposal.

- 9) A Bushfire Management Zone (BMZ) is proposed between the Stage 2 building envelopes and proposed rehabilitation area. The BMZ is intended to maintain a discontinuous fuel profile through ongoing understory maintenance while retaining selectively spaced vegetation to prevent canopy connectivity. Impacts to vegetation proposed within a Bushfire Management Plan must also comply with the Biodiversity areas overlay code in that development within mapped HES areas must conserve and restore ecological features and ecological processes, koala habitat trees and areas of strategic biodiversity value. In order for the proposal to comply with the Biodiversity areas overlay code, Lot 3 is to be removed.
- a) Provide updated bushfire reporting and proposal plans removing Lot 3 and clearly demonstrate amended bushfire setbacks.
- 10) The application must consider the appropriateness of selective canopy removal in any proposed co-located BMZ and HES mapped areas in conjunction with the requirements of the Biodiversity areas overlay code and the tree survey data provided in the Tree Retention and Removal Plan.
- a) If any selective tree removal is proposed in a BMZ, demonstrate that the extent, method and location of removal is the minimum necessary to achieve the required bushfire outcomes and does not compromise the ecological values of mapped HES areas utilising the tree survey data on hand.
- 11) Section 4.7 of the BMP states patch and corridor filtering was used for the western strip of vegetation between the non-vegetated area of Lot 7 RP69231. Patch and corridor filtering following steps 2 and 3 of section 4.2.6 of *Bushfire Resilient Communities* with figures/maps that show the stages of processing was not provided.
- a) Provide a detailed description of how patch and corridor filtering has been applied in Figure 4-4 of the BMP (in accordance with section 4.2.6 of *Bushfire Resilient Communities*) to remove areas of bushfire prone vegetation that are connected to large patches of continuous fuel.
- 12) The BMZ provides specific information relating to ground-truthing and assessment areas however the following inconsistencies were identified:
- Table 2: Ground-truthed VHCs do not align with that shown on Figures 4-3 & 4-4.
 - Figures 4-3 and 4-4 identify the ground-truthed and post-development Assessment Area E as RE12.5.7 (VHC 10.1), however the BMP text describes Area E as non-remnant relic hardwood plantation. This area is also to be rehabilitated when the adjoining DA is enacted as per A004785250. It is unclear if Figure 4-4 and bushfire setback calculations uses the non-remnant or post-rehabilitation VHC. Assessment is to clearly identify and use the most conservative VHC in calculations.
 - A 12m bushfire setback is proposed for Lots 1 and 2 as a “separation buffer” however no calculations provided.
- a) Provide an amended BMP which addresses the bullet items above and clearly demonstrates changes to any bushfire setbacks required.

Landscape Design

- 13) The provided plans do not demonstrate how the proposed landscape buffers will prevent adverse impacts upon the amenity of residential areas or supports open space to satisfy the recreational and amenity needs of park residents in accordance with PO4, PO7 and PO8 of the Tourist park and relocatable home park code. Specifically, details are required of the landscape design of the proposed buffers and how areas indicated as open space are designed for passive and active recreation such as sheltered seating, children’s playgrounds, areas for ball games and cycling and walking routes.
- a) Provide a Landscape Concept Plan prepared by a suitably qualified Landscape Architect that demonstrates the following:

- i) The provision of large subtropical shade trees with the landscape buffer along Learoyd Road that can achieve a minimum height of 15m at maturity and are accompanied by a varied palette of screening shrubs and groundcovers;
- ii) A minimum of 3 tiers of landscaping along the side boundaries that includes columnar screening trees, shrubs and groundcovers;
- iii) Details of the proposed private and communal open space areas including material finishes, proposed embellishments and associated landscaping treatments;
- iv) Detail how the landscaping proposed within landscape buffers within the Powerlink easement will be designed in accordance with the easement design requirements while also achieving effective landscape buffering. Consider a densely planted palette of medium height hardy native shrubs;
- v) Include a clearly delineated pedestrian path network that links each proposed dwelling with internal recreational areas and the streetscape.
- vi) Details of a planting palette that details the selected plant species including planting densities and stock sizes in accordance with PO7 and PO8 of the Landscape work code;
- vii) Detail how the proposal will achieve water sensitive design measures as outlined in PO12 of the Landscape work code;

Verge Width

- 14)** The proposed verge dedication on the north south section of the new road is conservative and less than required. This does not align with BSD-1021, which requires a 4.25m verge on both sides of new neighbourhood roads. The proposed civil engineering plan for the adjacent lot at 210 Learoyd Road (A006739543) also indicates a 4.25m verge on the western side of the new internal road.
- a) Provide amended plans with a revised verge width of 4.25m to align with the neighbouring proposal and BSD-1021.
 - b) Demonstrate on the proposed plans new footpaths within the new internal road to achieve PO10/AO10.1 of the Subdivision code.

Traffic

- 15)** Provide a Traffic Functional Layout plan that outlines the extent of the proposed road works, including cross-sections and key dimensions.

Refuse

- 16)** Suitability of detention tanks within the Relocatable home park needs to consider heavy vehicle (and potential crane) loading requirements.
- a) Provide further details demonstrating that the detention tanks can appropriately handle the weight of heavy vehicles etc.
- 17)** The refuse storage area of the RHP is required to be increased in size to provide occupants sufficient storage, capacity, source separation and unimpeded access to all bins. In accordance with PO8/ AO8.1 and AO8.2 of the Infrastructure design code.
- a) Provide amended architectural plans which clearly demonstrates the development has provided a roofed and wholly screened "Refuse Enclosure" which has a minimum of 8.43m² (internal dimensions of 5.62m x 1.5m). Ensure to denotate the GFA (m²) and internal dimensions of the "Refuse Enclosure" on the plans.
- 18)** The Traffic Report provided includes a 'Vehicle Tracking Analyses', which demonstrates a 10.24m Rear Loader Refuse Collection Vehicle (RCV) can safely and efficiently service the RHP. However, the swept path analysis has not included a vehicle specification table. In accordance with PO1/AO1, PO19/AO19.2 and AO19.3 of the TAPS code and PO8/AO8.1 and AO8.2 of the Infrastructure design code demonstrate the following:

- a) Submit a revised RPEQ certified swept path analysis for a 10.24m Rear Loading RCV (As per BSD - 3008-2) as specified in Table 3 of the Refuse PSP which demonstrates safe and efficient on-site servicing can be undertaken whilst utilising a lock-to-lock time of 6.00s and curb-to-curb turning radius of 9.757m.
- b) Ensure to include the vehicle specifications (i.e., length, width, track, operational height, lock-to-lock, curb-to-curb radius etc) on the revised RPEQ certified swept path analysis.

Stormwater

- 19) The Stormwater Management Plan is generally supported from an engineering outcome, however the Relocatable home park stormwater discharge in the balance area is temporary and will be redirected to underground minor drainage system in the new road in Stage 2. If the ROL component is withdrawn stormwater is to demonstrate the Lawful point of discharge does not impact on the environmental constraints on the site (as mentioned above).

Sewer Infrastructure and Works Outside Property Boundary

- 20) Submit a SAN Notice to demonstrate the development can be serviced in accordance with Overall outcome 4.c of the Willawong neighbourhood plan code, provide plans showing where the sewer infrastructure will be located ensuring that impacts to the environmental values are minimised and are being protected on the site.
- 21) It is noted in the assessment report that works are required in Council owned land (Lot 900 on SP315966). to extend the sewer line to the south of the property. An application for owner's consent is required to allow construction on Council land.
 - a) Submit an application for owner's consent.
- 22) There is potential that the proposed sewer works will be within close proximity of Council-controlled vegetation within Council land to the south. Further information is required to demonstrate the development will not impact on the retention of vegetation in accordance with PO2/PO19/AO19.1 of the Subdivision code and Biodiversity overlay code. Design changes may be required when this information has been assessed/provided.
 - a) Provide plans that show the location of the sewer infrastructure.
 - b) Provide an arborist report prepared by an AQF Level 5 qualified arborist identifying the trees by surveyed location, species, height, canopy spread, diameter at breast height and condition, as per Infrastructure design planning scheme policy (ID PSP) requirements. This report is required to demonstrate how Council vegetation will be successfully retained and protected within the proposed development layout.
 - i) Tree protection zones and structural root zones must be provided on the drawings/report with reference to Australian Standard - AS4970 Protection of Trees on Development Sites.
 - ii) The arborist report should demonstrate that vegetation retention has been considered for all proposed construction works, including earthworks, construction access points and proposed services/infrastructure. The report is to outline different methodologies including tunnel boring of services to ensure retention of the council-controlled vegetation.
 - iii) The ultimate design is to be endorsed by the arborist, regarding long term retention and protection of council-controlled vegetation.

Regional Infrastructure Corridors

- 23) Submit an assessment from a specialist in electrical analysis that indicates that the development complies with AO4.2 of the Regional infrastructure corridors and substations overlay code.

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 A006976128.

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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