

Dear Assessment Manager,

Please accept the attached formal submission opposing Development Application **A006914094** concerning **83 Dannenberg Street, Carseldine QLD 4034 (Lot 100 on SP190782)**.

We attempted to lodge the submission through Council's online portal but were unable to complete the process due to a system error.

Please treat this email and the attached document as our formal submission under the Planning Act 2016.

Our submitter details are provided below for Council's records and to ensure the submission is properly made:

We request that our names, residential address, email address, signatures and other personal contact details **not be displayed publicly on Development or included in the publicly accessible copy of our submission**.

The attached submission has therefore been prepared without personal identifying information. Council may retain the details supplied in this email privately for assessment, correspondence and statutory purposes.

Please confirm receipt and registration of this submission against Development Application
A006914094.

FORMAL OBJECTION SUBMISSION

Planning Act 2016 (Qld) | Brisbane City Plan 2014

DATE	2 September 2026
TO	The Assessment Manager, Brisbane City Council
LODGEMENT	GPO Box 1434, Brisbane QLD 4001 DALodgement@brisbane.qld.gov.au
APPLICATION	A006914094
PROPERTY	83 Dannenberg Street, Carseldine QLD 4034
LEGAL DESCRIPTION	Lot 100 on SP190782
CURRENT PROPOSAL	Reconfiguring a Lot - 1 existing lot into 2 residential lots

Dear Assessment Manager,

We lodge this formal objection to Development Application A006914094. We respectfully request that Brisbane City Council refuse the amended application.

..... Our concerns arise from the acknowledged ecological value of the property, the continuing intrusion into mapped biodiversity land, and the permanent consequences of establishing an additional residential lot within this wildlife corridor.

1. Council has already identified unacceptable environmental encroachment

Council's Information Request dated 17 April 2026 records that the site is mapped within the High Ecological Significance (HES) and High Ecological Significance Strategic (HESS) sub-categories of the Biodiversity Areas Overlay. It also records the presence of Endangered Regional Ecosystem RE12.5.2a across approximately 95% of the site and identifies the land as part of a broader ecological corridor.

Most importantly, Council stated that the proposed encroachment into the overlay was "not supported" and required development footprints to be confined to existing cleared areas of the site, within the footprint of the current dwelling.

The amended design reduces the scale of the original proposal, but it does not eliminate the encroachment. A reduced environmental impact is not the same as avoidance of that impact or compliance with Council's stated position.

Source: Brisbane City Council, Information Request, 17 April 2026, Item 1 - Ecological Values.

2. The amended proposal still clears mapped HES vegetation

The live proposal has been amended from one lot into three lots to one lot into two lots. It retains the existing dwelling on proposed Lot 100 and creates proposed Lot 101, a 6,256 m² rear residential lot with a 300 m² building envelope and a 4 m-wide access handle.

The applicant's own response confirms that the amended proposal will still:

- impact approximately 312 m² of mapped HES land;
- remove nine trees;

- introduce a new residential building envelope and access driveway behind the existing dwelling; and
- rely upon a financial environmental offset for the acknowledged biodiversity impact.

These are permanent physical impacts within land that Council has identified for protection, conservation and restoration. The smaller amended footprint does not remove the fundamental conflict between creating a new residential development area and preserving the mapped ecological values of the land.

Sources: Santoshi Development Consultants, Information Request Response, 21 July 2026; Gaia Environmental Consulting, Information Request Response, 14 July 2026; amended ROL Plan SDC2173-213.

3. Loss and fragmentation of a functioning wildlife corridor

The applicant's planning and ecological material recognises the site's role in a broader wildlife corridor linking nearby parks and bushland, including Dannenberg Street Park, Lacey Road Park, Fitzgibbon Bushland and Linkfield Road Parklands. The site also contains Core Koala Habitat, Essential Habitat and Endangered Regional Ecosystem vegetation.

Our concerns are also based on direct, long-term observations We regularly observe native wildlife using this vegetation, including seasonal parrots and other native birds, snakes, possums and other fauna. We have photographs documenting this wildlife activity.

A new residence does not affect only the precise area occupied by a building. It introduces continuing edge effects through access, fencing, lighting, noise, domestic activity, garden establishment, maintenance and the potential presence of domestic animals. These ongoing impacts occur beside vegetation relied upon for shelter, feeding and movement.

4. A financial offset does not replace this established habitat

The applicant proposes a financial offset for the 312 m² biodiversity impact. An offset payment does not preserve the trees and habitat at this location. It cannot immediately reproduce mature canopy, established feeding resources, refuge areas or the site-specific connectivity provided by this parcel.

The Biodiversity Areas Overlay Code prioritises avoidance and mitigation before offsets are considered for residual impacts. In this case, avoidance remains reasonably available by not creating a new residential building envelope within the mapped area, consistent with Council's original request.

5. The proposed covenant and rehabilitation measures do not justify subdivision

The Concept Rehabilitation Plan proposes an Environmental Management Zone of approximately 0.5 hectares, understorey restoration and a 24-month monitoring and maintenance period. We support genuine rehabilitation of the land, but rehabilitation should not depend upon approving an otherwise avoidable residential intrusion.

The application material uses expressions such as an environmental covenant area and environmental management zone. Council should not assume that the land will be protected permanently unless a legally enforceable covenant is registered on title before the new lot is created and binds every future owner.

A 24-month establishment period is also short when compared with the time required for restored understorey vegetation to become established, resilient and self-sustaining. The practical success of rehabilitation will depend on long-term compliance, monitoring and enforcement well beyond the initial maintenance period.

Source: Gaia Environmental Consulting, Concept Rehabilitation Plan, 9 July 2026.

6. Cumulative and long-term development pressure

Our objection is not based merely on the immediate visual effect of one future dwelling. Creating a separate residential title, access handle and building envelope permanently changes the planning and ownership structure of this natural area.

A future residence is likely to generate continuing pressure for access works, utility services, fencing, lighting, ancillary structures, landscaping, bushfire management and ordinary residential amenities. Even if some activities are initially restricted, the environmental area will remain attached to and managed as part of a separately owned residential property.

Council should assess the realistic lifetime consequences of the new lot, rather than treating the proposal as only a 300 m² building envelope on a plan.

7. Loss of the natural buffer and adjoining residential amenity

The vegetation provides a substantial natural buffer between adjoining homes. It contributes to privacy, noise attenuation, visual separation and the distinctive natural character of this part of Carseldine. This natural outlook and separation

Although residential amenity is not our principal objection, the loss of established vegetation and introduction of residential activity behind the existing dwelling would permanently alter the relationship between the subject land and surrounding homes.

8. Requested outcome

For the reasons above, we respectfully request that Brisbane City Council:

- refuse Development Application A006914094;
- require development to avoid the mapped biodiversity area and remain within the existing cleared footprint, consistently with Council's Information Request; and
- support restoration and long-term protection of the existing ecological corridor without creating an additional residential lot within it.

If Council is nevertheless minded to approve the application, we request that any approval include the strongest lawful protections available, including:

- a permanent environmental covenant registered on title before the subdivision is sealed;
- a prohibition on clearing, buildings, sheds, pools, lighting, storage, earthworks and restrictive fencing within the protected area;
- fauna-friendly fencing and controls addressing domestic animals and external lighting;
- an independently supervised rehabilitation program with measurable completion criteria and monitoring extending beyond 24 months;
- protection of retained trees and root zones during access, servicing and construction works; and
- a condition preventing any development or disturbance outside the approved building envelope and access area.

Once mature vegetation and functioning habitat are removed, the environmental loss cannot readily be reversed. We ask Council to give decisive weight to its own assessment that these ecological features must be protected, conserved and restored.

Submitted electronically through Brisbane City Council's online submission portal. Submitter names, residential addresses and contact details have been supplied separately in the private contact-details section of the portal.