

WILLOWTREE PLANNING

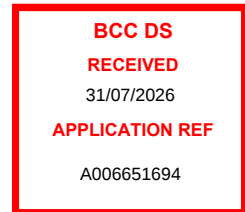


31 July 2026

Ref: WTJQ24-061

Brisbane City Council
GPO Box 1434
Brisbane Qld 4001

By email: joel.wake@brisbane.qld.gov.au



Attention: Joel Wake

**RE: RESPONSE TO INFORMATION REQUEST - A006651694
51 CROSSACRES STREET, DOOLANDELLA QLD 4077**

Dear Joel,

Willowtree Planning (Willowtree) acts on behalf of Loc Phat Pty Ltd (the Applicant) regarding the Development Application (DA) submitted to Brisbane City Council (Council) over the land located at 51 Crossacres Street, Doolandella, formally described as Lot 34 on RP90234 (Site).

The DA seeks approval for the following aspects of development over the Site:

- Development Permit for Reconfiguring a Lot (1 Lot into 23 and common property)

An Information Request (IR) was received from Council on 18 July 2025. The date to respond has been extended by mutual agreement to 14 August 2026 as per Council's correspondence dated 30 July 2026 and as such this response is being provided within the prescribed period.

It is noted Council requested a variety of changes to the layout as part of the information request and further discussions. For the reasons set out below, the Applicant respectfully disagrees with Council's position on items 1, 2 and 3 and does not propose to revise the subdivision layout in response to those items. The Application is maintained as lodged.

Pursuant to section 13.2(a) of the Development Assessment Rules (DA Rules), a response to each of the items raised in the IR is provided below, along with the following supporting documents:

- **Appendix 1** Revised Subdivision Plan prepared by ONF Surveyors
- **Appendix 2** Building Envelope Plan prepared by ONF Surveyors
- **Appendix 3** RCV Swept Paths prepared by Modus Traffic Engineering
- **Appendix 4** Amended Engineering Report & Stormwater Management Plan
- **Appendix 5** Amended Civil Engineering Plans
- **Appendix 6** Letter of Support by Cr Strunk

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Response to Information Request**Item 1****Ecological values**

- 1) *The proposed subdivision layout has changed significantly to include a development footprint encompassing the entirety of the site, resulting in the proposed removal of all vegetation. Therefor Group have provided an Ecological Assessment Report which confirms over half of the site represents remnant endangered Regional Ecosystem RE12.5.3a. This is a recognised Significant Vegetation Community under Table 8.2.4.3.B of the Biodiversity areas overlay code and is present within the mapped High Ecological Significance (HES) and High Ecological Significance Strategic (HESS) areas on site. In accordance with PO4 of this code, ecological values must be protected, conserved and restored on site. Although the code assessment provided indicates a financial offset will be provided to compensate for the loss of these ground-truthed ecologically significant values, this response is insufficient to ensure compliance with PO4 of the code. As such, the current proposed lot layout cannot be supported, and further retention of ecological values is required to ensure compliance with the Biodiversity areas overlay code. Retention of all HES-mapped values will be required within an environmental covenant.*
- a) Provide a revised subdivision plan demonstrating retention of all ecological values within the mapped HES area, in a proposed environmental covenant.*
 - b) Provide a revised Tree Retention Plan, illustrating retention of all native vegetation within the HES-mapped area.*
 - c) Provide a revised Offset Delivery Strategy that confirms the total impact area to be offset (noting changes required to retention of vegetation above), in accordance with PO9 of the Biodiversity areas overlay code and the Offsets PSP. This must include a plan clearly identifying the existing HES/HESS Biodiversity areas overlay, together with the extent of development footprint impacting upon mapped areas (e.g. development areas, roads, building envelopes, service alignments and access for construction works) to determine the area of impact.*

Response:

The Applicant respectfully disagrees with Council's position in Item 1 above. The Applicant's position is that the proposal, as lodged, achieves an appropriate level of compliance with PO4 of the Biodiversity areas overlay code for the reasons set out below. The Applicant does not propose to revise the subdivision layout to retain vegetation within the HES and HESS mapped areas and the application is maintained as lodged.

The Applicant's position is grounded in the detailed technical assessment of the Site's ecological values and the specific circumstances of the vegetation community, as set out in the Ecological Assessment Report (EAR) prepared by Therefor Group for the following reasons.

Condition and function of the vegetation patch

The EAR confirms that whilst the Site contains remnant vegetation mapped as Regional Ecosystem RE12.5.3a, the practical ecological value of this patch is materially compromised by the following site-specific conditions:

- The vegetation patch is highly degraded, with environmental weeds present throughout the understory and sub-stratum. These weeds are actively suppressing natural regeneration and producing ongoing deleterious ecological effects. The EAR concludes the values currently exhibited by the patch do not generally reflect the values assigned under the code mapping.
- The patch is small and exhibits an unbalanced edge-to-internal habitat ratio. Small, isolated urban vegetation patches of this type have limited capacity to develop self-resilience where ongoing anthropogenic pressures from the surrounding urban environment continue to act on ecological values. Without perpetual and active maintenance, further degradation is considered unavoidable, and meaningful habitat enhancement is not achievable.



- The EAR's landscape ecology assessment quantifies this edge effect. Whilst the patch comprises a total area of 6,206.4m², applying a conservative 20m edge influence buffer (noting a 50m buffer is more typically applied in landscape ecology literature to account for a broader range of species groups) reduces this to only 1,186.3m² of core functional habitat unaffected by ongoing edge effects. This equates to a Core Area Index (CAI) of 19%, placing the patch within the "edge dominated" classification (CAI less than 20%), meaning edge effects will persist regardless of rehabilitation efforts. Were a 50m buffer applied, as is more typical, the patch would retain no functional core habitat area. Few species groups have functional core habitat requirements below 1 hectare. Those that do, such as small reptiles and small ground mammals, rely on core habitat primarily for microclimate stability and reduced predator access, a function of comparable importance for larger fauna such as koalas. Smaller forest bird species have also been reported in the literature to require a minimum of 1 hectare of functional core habitat to persist in a meaningful way.
- These metrics give further weight to the findings of the EAR that the vegetation area is substantially compromised in its functionality and demonstrate that even with Site rehabilitation, retention of the vegetation within the urban matrix does not provide a supportable ecologically positive outcome over that of providing an offset to better enhance habitat in a more suitable location.
- The patch is demonstrated to be ecologically isolated and does not contribute to habitat connectivity in the broader landscape. This is supported by the low diversity of fauna observed during field surveys and the demonstrated absence of koala utilisation as evidenced by the on-site SAT results.

Why in-situ retention will not achieve a better ecological outcome

The EAR concludes that retention of the vegetation patch under a development approval in this urban context is unlikely to produce a valuable or enduring environmental outcome. Given the isolation of the patch, ongoing urban pressures, and the degraded condition of the understorey, the patch does not represent the type of ecologically functional habitat that the retention requirement in PO4 is intended to protect. This is further supported by the EAR's Core Area Index (CAI) assessment, which confirms the patch holds negligible functional core habitat and provides no reasonable prospect of supporting a stable, self-sustaining ecological community regardless of the rehabilitation measures applied. On this basis, retaining the patch in its current, degraded state is unlikely to result in a lasting improvement in ecological values over time.

The Applicant's ecologists have accordingly concluded that a greater ecological outcome can be achieved through a well-targeted financial offset directed to supporting more viable habitats of greater strategic value within the Brisbane City Council local government area than through in-situ retention of a degraded and isolated urban remnant.

Offset pathway and compliance with PO4 and PO9

The EAR provides a detailed Offset Delivery Strategy in Section 10, which addresses PO4 and PO9 of the Biodiversity areas overlay code and the Offsets PSP. The proposed financial settlement offset has been calculated using the Queensland Government Financial Settlement Offset Calculator in accordance with the Queensland Environmental Offsets Policy.

The calculated offset liability for the impacts to MLES is as follows:

- HES impact area: 0.5996 ha - offset area required: 1.7988 ha - financial offset cost: \$458,021.25
- HESS impact area: 0.1754 ha - offset area required: 0.474 ha - financial offset cost: \$133,984.20

The Applicant further notes that SARA, as the referral agency for development interfering with koala habitat under Schedule 10, Part 10 of the *Planning Regulation 2017*, has assessed the Application against State Code 25 of the SDAP and has confirmed, by way of their referral agency response dated



20 June 2025 (Ref. 2412-43847 SRA), the development does not cause an unacceptable impact on mapped koala habitat areas and that the significant residual impact is acceptable, subject to delivery of an environmental offset for 113 non-juvenile koala habitat trees.

The financial settlement offset for that impact has been calculated at \$103,960.00, representing an equivalent area of 0.452 ha, and will be delivered in accordance with the *Environmental Offsets Act 2014* upon approval.

The Applicant will deliver these offsets in accordance with the *Environmental Offsets Act 2014* and the *Environmental Offsets Regulation 2014*. Upon approval of the development, a Notice of Election will be prepared and provided to Council and SARA respectively, with relevant calculations and details included.

The Applicant submits this constitutes a performance-based outcome that is both feasible and appropriate to the specific condition and context of the Site's vegetation communities. The financial offset mechanism is a lawful and recognised compliance pathway under PO9 of the Biodiversity areas overlay code, and the Applicant respectfully submits that it satisfies the intent of PO4 in circumstances where in-situ retention is neither ecologically meaningful nor capable of delivering the values the code seeks to protect.

The Applicant respectfully disagrees with Council's position that retention within an environmental covenant is mandatory. The performance outcome is capable of being satisfied through an offset where in-situ retention is not reasonably achievable given the site constraints and the layout required to achieve viable residential lots.

Mitigation measures

In addition to the offset, the following mitigation and management measures are proposed:

- Native flora landscaping will be incorporated into streetscapes and open spaces to soften the urban transition, minimise edge effects, and align with regional ecosystem characteristics.
- Fauna-sensitive design measures will be incorporated as identified in the Ecological Assessment Report, including fencing design to manage fauna movement and prevent koalas from entering at-risk areas such as roads and residential lots with domestic animals.
- All clearing and construction activities will be carried out in accordance with the Koala Management Plan (reference 23-0632EBF-02, dated 24 April 2025) as required by the SARA conditions.
- Appropriate erosion and sediment control measures will be implemented during construction in accordance with an Erosion and Sediment Control Plan prepared by a suitably qualified professional.

The Application is maintained as lodged in respect of item 1(a), (b) and (c). A revised subdivision plan, Tree Retention Plan or Offset Delivery Strategy premised on HES retention is not being provided, as the Applicant's position, for the reasons set out above, is that in-situ retention is not required to achieve compliance with PO4 in the specific circumstances of this Site.

Item 2

Significant Landscape Vegetation

- 2) *In addition to the above, the proposed removal of all vegetation on site is also not supported with regard to Significant landscape vegetation. The lot layout has not been designed to retain and respond to physical features including the retention of significant vegetation in accordance with PO19 of the Subdivision code. The existing vegetation meets the definition of significant under the Vegetation Planning Scheme Policy due to landscape features that contribute to Brisbane's subtropical character and amenity including being visually prominent and discernible from the streetscape due to the vegetation's significant size and*



form; supporting shading and contributing to the attractiveness of the locality through supporting the residential amenity of adjoining sites; supports one or more native wildlife habitat features and provides important seasonal fruiting or flowering feeding resource for significant fauna species and contains species that are identified as being of city-wide significance within the Brisbane local government area.

- a) The proposed site design will be required to be revised to accommodate significant vegetation by reviewing the extent of proposed earthworks, modifying lot sizes, lot arrangements and ensuring that the development layout retains and responds to existing significant vegetation (both on the development site, adjoining and existing/new street verges).
 - I. Amalgamation/re-arrangement of some lots to ensure retention of trees by ensuring that a variety of lots have sufficient size to ensure that all future development (including services) will remain outside of the tree protection zone (TPZ) of trees to be retained.
 - II. Review of extent of proposed earthworks for the development to maximise tree retention on site and streetscape verge/s. Provide cross-sections of any proposed retaining walls and batters within the tree protection zones of trees to be retained.
- b) Provide a revised Vegetation Retention Plan (VRP) addressing the landscape values of all existing trees. The revised Vegetation Retention Plan is to be supported by an Arborist Report of which has been prepared by a qualified AQF Level 5 Arborist (Diploma in Arboriculture). The VRP and Arborist Report must clearly show the surveyed location of all vegetation with DBH of 150mm or greater and must include the following information:
 - I. Botanical species name;
 - II. Height (m);
 - III. Diameter at breast height (DBH), measured as the trunk diameter at 1.4 m above ground level;
 - IV. Crown diameter (m);
 - V. A general tree health assessment;
 - VI. A landscape assessment of trees on site, including providing photos of trees to be retained and removed (with the corresponding identification number as per the tree schedule).
 - VII. Tree protection zones must be provided on the drawings/report with reference to Australian Standards - AS4970 Protection of Trees on Development Sites.
 - VIII. The proposed development layout, including preliminary earthworks plan for the proposed development, driveways and ancillary structures, indication of the existing and proposed levels in relation to surveyed vegetation,
 - IX. Location of proposed services; and
 - X. Proposed extent of all cut/fill and civil works to construct the development, including Stormwater and other services/infrastructure.
 - XI. The Arborist Report should demonstrate that all tree retention has been considered for all proposed construction works, including earthworks and construction management activity. This also includes adjoining neighbouring trees.
- c) Re-address the Subdivision code PO19/AO19.1 and Vegetation PSP requirements and respond to the Vegetation planning scheme policy s3, s4 a,b,d,e, f (i, ii) and note where tree removal is being proposed, respond to the replacement tree planting requirement and this is to be shown on a replacement tree planting plan, noting all replacement trees are to be located within the private lots only, and tree replacement numbers are to be consistent with achieving the no net canopy loss for the development.



Response:Lack of trees that meet the significant landscape tree criteria

It is noted the Site is subject to the Significant landscape tree overlay and that the Vegetation planning scheme policy prescribes that vegetation listed in the Significant landscape tree overlay code or shown on the Significant landscape tree overlay map is a type of significant vegetation.

The Applicant acknowledges that part of the Site falls within the Landscape features sub-category of the Significant landscape tree overlay mapping. However, the Applicant considers the tree survey which has been undertaken demonstrates no vegetation meeting that definition is present on the Site and as such this could be attributed to a mapping error.

The Applicant notes Table 8.2.19.3.B of the Significant landscape tree overlay code prescribes the circumstances where trees are 'significant landscape trees' in the Landscape features sub-category. With regard to the Tree Data Catalogue included in the EAR, the Applicant notes the species overlap between the Tree Data Catalogue and Table 8.2.19.3.B is two species, being the *Eucalyptus microcorys* and the *Delonix regia*. The Site does not contain any of the other tree species identified in that table.

Further, the Applicant notes the species which do match Table 8.2.19.3.B do not meet the dimension threshold in Table 8.2.19.3.B as follows.

Tree No.	Species	DBH	Table 8.2.19.3.B threshold	Meets threshold?
8	<i>Eucalyptus microcorys</i>	233mm	≥600mm	No
12	<i>Eucalyptus microcorys</i>	160mm	≥600mm	No
16	<i>Eucalyptus microcorys</i>	210mm	≥600mm	No
15	<i>Delonix regia</i>	170mm	≥800mm	No

On this basis, the Applicant submits the mapping layer is inconsistent with the actual vegetation on the Site.

The Applicant has given further consideration to Council's position under PO19 of the Subdivision code, informed by the Ecological Assessment Report (EAR) prepared by Therefor Group which was submitted previously as part of the application material.

It is acknowledged PO19(a) of the Subdivision code prescribes that a development layout is to retain and respond to physical features, including significant vegetation, and that Council have identified the existing vegetation would be 'significant' on the basis of its visual prominence, shading and amenity contribution, habitat value, and city-wide significance.

For the reasons set out above, the existing vegetation does not meet the criteria for significant landscape trees. Therefore the Applicant submits as there are no trees on the Site which meet Table 8.2.19.3.B and therefore PO19(a) does not require the layout to retain or respond to this vegetation.

Notwithstanding, native flora landscaping will be incorporated into streetscapes and open spaces as part of the development, consistent with the mitigation measures set out in response to item 1, to support the subtropical character and amenity of the locality.

Pattern of development

The Site is surrounded by similar subdivision or multiple dwelling developments, all of which have resulted in cleared land parcels to accommodate residential development. The proposed development is not inconsistent with what has been constructed on nearby sites and is reflective of this pattern. The Applicant submits the development is consistent with community expectations for the area and is suitable for the Site.



On the basis of the above, no revised site design, Vegetation Retention Plan or replacement tree planting plan has been provided.

Item 3**Density**

- 3) *The site is included in the Doolandella neighbourhood plan, Potential development area – Low density residential. The neighbourhood plan nominates a maximum density of 12 dwellings per hectare, therefore the maximum density expected for the site is 12-13 dwellings. The 23 lots proposed significantly exceeds the expected density outcome for area. This density is also proposed in combination with majority small lots below the minimum requirement, and only 1 standard lot at 465m².*
- a) *Submit revised plans with minimum lots sizes, in accordance with AO1.1/PO1 of the Subdivision code.*
 - b) *Submit a building envelope plan as per AO27.1 / PO27 of the Subdivision code.*

Response:

The Applicant acknowledges the site and surrounding properties are within the area annotated for Low density residential – dwelling houses under Figure a of the Doolandella neighbourhood plan code. As shown, this area is primarily in the Emerging community zone and there have been some significant recent developments in the area evidenced by the lot outlines on Figure 1 below.

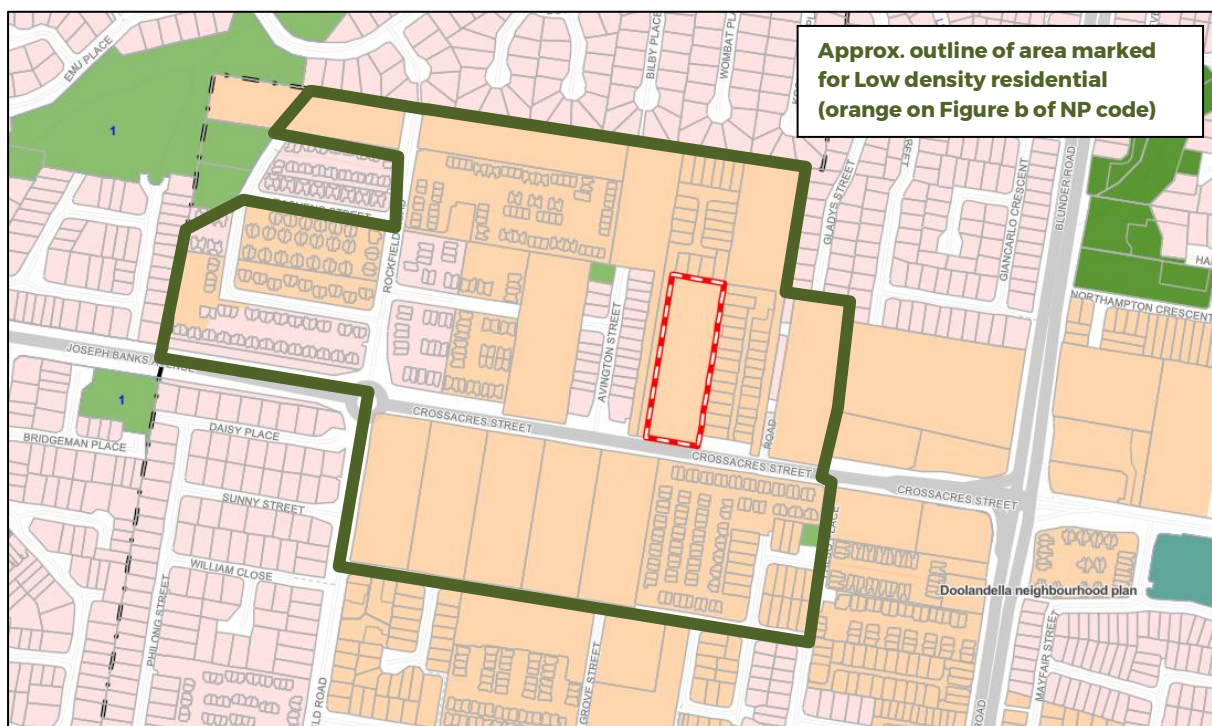


Figure 1. Approx. outline of area marked for Low density residential (orange on Figure b of NP code)

The Applicant notes overall outcome 3f of the Doolandella neighbourhood plan code prescribes predominantly dwelling houses at a yield of 12 dwellings per hectare, and not a maximum. As such, any exceedance of this number is not automatically inconsistent with the overall outcome.

The overarching intent for overall outcome 3f is that development “provides for a mix of housing types, styles and densities”. The proposal achieves this through a lot configuration ranging from 284m² to 465m² (average 339m²), providing a variety of lot sizes to support different dwelling house typologies, household types and affordability levels, consistent with the established lot pattern and character of the surrounding Doolandella locality.

The Applicant also observes that as shown in Figure 1 above, there have been significant developments nearby and within the area identified on Figure a. The Applicant notes the following examples of approvals in close proximity to the Site, all at densities materially exceeding a yield of 12 dwellings per hectare:

- 43 Crossacres Street - 23.6 dwellings per hectare (A004488312)
- 63 Crossacres Street, Doolandella - 19.7 dwellings per hectare (A004231766)
- 89 Cloverdale Road, Doolandella - 18.7 dwellings per hectare (A005819019)
- 45 Redhead Street, Doolandella - 17.7 dwellings per hectare (A005348307)
- 53 Crossacres Street - 17.3 dwellings per hectare (A006134302)

These approvals establish that the local character and density expectations in this part of Doolandella have evolved beyond the nominal density contemplated by the neighbourhood plan. The approved developments in the immediate vicinity reflect a density pattern that is broadly consistent with the proposed density and is considered to be suitable for the site.

The Applicant acknowledges Council's comment regarding the lots being primarily under 450m² small lot, however considers the proposed lot sizes are consistent with the lot sizes approved in the immediate area and are suitably sized and dimensioned to accommodate future dwelling houses in accordance with PO1 of the Subdivision code.

The Applicant submits a Building Envelope Plan (refer **Appendix 2**) to demonstrate compliance with PO27 of the Subdivision code as requested.

Item 4**Bushfire**

- 4) *The Bushfire Hazard Assessment prepared by Therefor Group indicates the site will not be subject to bushfire risk, and as such, no further assessment against the code is required. However, this assessment does not take into account retention of vegetation on site as requested at point (1) and (2) above, and as such, a revised Bushfire Hazard Assessment will be required to ensure the proposal is not subject to an intolerable level of bushfire risk.*
- a) *Provide a revised Bushfire Hazard Assessment taking into consideration retention of all HES-mapped ecological values, as requested above.*

Response:

It is noted Council's request for a revised Bushfire Hazard Assessment is contingent on the Applicant revising the subdivision layout to retain HES-mapped vegetation. As the Applicant is not revising the layout, the Bushfire Hazard Assessment prepared by Therefor Group and submitted with the application material remains applicable and no revision is required. It is noted the assessment concluded the Site is not located within a designated bushfire prone area.

Item 5**Road widening**

- 5) *The 'not to prejudice' road dedication shown on the submitted plans is not in accordance with the Council requirements shown on Road Widening Plan 51 Crossacres Street - RC16163 - Issue 1. This plan has been provided with the original information request and a copy is again attached for your convenience.*
- a) *Provide amended plans in accordance with PO3 of the Road hierarchy overlay code that show a 12m wide 'not to prejudice' road requirement along Crossacres Street frontage.*



Response:

Please see **attached** Revised Subdivision Plan prepared by ONF Surveyors (**Appendix 1**) which notes a 12m wide 'not to prejudice' road requirement along Crossacres Street frontage in accordance with PO3 of the Road hierarchy overlay code.

Item 6**Internal access**

6) *The community title scheme (CTS) internal road is to provide a 1.5m wide footpath along its full length. Furthermore, yellow 'no parking' lines will be required along the 'T-head' to facilitate turning around of an RCV and other vehicles.*

a) Provide amended plans in accordance with PO1 and PO19 of the Transport access parking and servicing (TAPS) code that show:

- I. 1.5m wide footpath along one side of the internal CTS road.*
- II. Yellow 'no parking' line and/or signs and/or pavement markings to the entirety of the turnaround area to enable safe and efficient on site RCV manoeuvring*
- III. The 10m wide internal access way is to be clearly labelled as 'common property'*

It is also not clear what pavement type and strength is proposed for the internal access way.

b) Submit amended civil engineering plans that denote the 6.5m wide carriageway will have a pavement that is sealed and constructed to carry a nominal traffic loading of 1.5 x 10⁴ ESA.

Response:

Please see **attached** Revised Subdivision Plan prepared by ONF Surveyors (**Appendix 1**) which demonstrates a 1.5-metre wide footpath along one side of the internal CTS road and yellow 'no parking' lines and pavement markings to the entirety of the turnaround area to facilitate RCV manoeuvring, in accordance with PO1 and PO19 of the Transport, Access, Parking and Servicing code.

Item 7**Refuse**

7) *Refuse collection vehicle (RCV) swept path analysis (dwg. no. MOD24420QLD - SK01, Rev A, 24/3/25 by Modus) demonstrates on site RCV turnaround, however no turning circle kerb to kerb measurement has been included, nor 500mm clearances as required by section 8.2(7)(a) of the TAPS PSP.*

a) Utilising amended plans, submit updated RPEQ certified and scaled RCV swept path analysis for Council's side loading RCV that include and specify 500mm clearances and correct turning circle kerb to kerb measurement.

Response:

Please see **attached** Swept Path prepared by Modus Traffic Engineering (**Appendix 3**) which demonstrates appropriate on site RCV turnaround as requested.

Item 8**Stormwater**

8) *Notwithstanding that lots 10 – 13 are anticipated to be removed, the following assessment is based on the submitted plans.*

Lots 10 to 13 must be at least 300mm above the tank grate level in the driveway requiring the minimum level of those lots to be RL50.5, which is approximately 150mm higher than



proposed. This is required to ensure lots will not be impacted by ponding/ surcharge from the tank, otherwise a major flow path must be provided through the lots to rear channel. Furthermore, a grated opening having 1% AEP capacity needs to be provided above the tank inlet and middle of the tank for maintenance, ventilation and inspection purposes. Also, a section of the tank showing the use of orifices through an internal weir (as wide as the tank and set-down 200mm from roof of tank). This weir is to be setback at least 900mm from the tank outlet so that in the event of any blockages flows would overtop the weir and exit the tank outlet pipe with no restrictions to flow.

Response:

Please see attached revised Engineering Report & Stormwater Management Plan (**Appendix 4**) and revised Civil Engineering Plans (**Appendix 5**) in response to the above item.

Conclusion

In summary, the Applicant maintains the proposed subdivision is suitable for the Site and that ecological and other impacts have been appropriately addressed. It is noted the proposed development is also supported by Councillor Strunk (refer letter of support in **Appendix 6**) who recognises the need for additional housing opportunity in the area.

In accordance with section 13.2 of the DA Rules, Willowtree confirms that this letter constitutes a full response to Council's information request. Accordingly, as this application is subject to impact assessment, the Applicant will proceed to public notification accordingly.

Should Council require any further clarification, please do not hesitate to contact the undersigned on 0400 012 722 or by email at brussell@willowtp.com.au.

Yours faithfully,



Ben Russell
Director - Queensland
Willowtree Planning Pty Ltd

