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16 July 2026

Dane Hoffman
Urban Planner
Planning Services South
Development Services
Brisbane City Council
Via email: Dane.Hoffmann@brisbane.qld.gov.au

Dear Dane

RESPONSE TO INFORMATION REQUEST
Application No: A006821274
Site Address: 360 Sherbrooke Road, Willawong Qld 4110

On behalf of our client, we provide this response to Council's Request for Further Information, dated 7 October 2025.

*Ecology*

1) *The proposed development is within the Koala habitat area sub-category of the Biodiversity areas overlay and Local waterway corridor sub-category of the Waterway corridors overlay. Impacts to ecology values from the proposed development are unclear given the provided arborist report was prepared in April 2023 based on materially different development plans, no detailed design has been undertaken, and trees have not been accurately surveyed. Additional information is required to enable an assessment against the Biodiversity areas overlay code and Waterway corridors overlay code. Provide a revised assessment against Section C of the Biodiversity areas overlay code and Sections A and C of the Waterway corridors overlay code, including:*
   a) *An ecological assessment in accordance with the Biodiversity Planning Scheme Policy prepared by a suitably qualified ecologist.*
   b) *A Tree Survey Plan in accordance with the Biodiversity Planning Scheme Policy including;*
      i) *All trees 150mm diameter at standard height (DSH) or greater on site/external works area and within 6m of site boundaries, with locations accurate to +/- 100mm;*
      ii) *The proposed detailed design development plan (as an overlay) including all services/infrastructure on site and external to the site, which clearly shows the full extent of all earthworks (cut/fill) required during construction of the development.*
      iii) *A clear indication of which trees are to be retained and which trees are to be removed, including the following information:*
      *(1) Scientific name;*
      *(2) Height;*

*(3) DSH;*
*(4) Crown diameter;*
*(5) Habitat features including hollows and scratch marks, nets etc.;*
*(6) Tree Protection Zones (TPZs) (in accordance with AS4970) and;*
*(7) General health assessment.*

*iv) 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.*

*c) Detail of fauna movement solutions to enable safe movement of fauna throughout the site and within the wider landscape.*

*d) Provide a Concept Rehabilitation Plan in the form of scaled plans and supporting documentation that includes but is not limited to the following information:*

*i) Description of proposed rehabilitation, including earthworks, methods, objectives;*
*ii) details of the proposed rehabilitation schedule, including staging, plant species names, stock size, quantities, densities, locations*
*iii) a detailed 24-month maintenance program for all rehabilitation works;*
*iv) stabilisation methods for all areas of exposed soil surface; and*
*v) specification notes on weed treatment and management, planting methods, mulching and soil preparation.*

## Response

28 South Environmental has prepared an Ecological Assessment Report in response to matters outlined in issue 1 (above). The report is based on the current development layout, and includes vegetation and flora assessments, fauna habitat investigations, landscape connectivity analysis, tree surveys and mapping, together with an assessment against the relevant Commonwealth, State and Brisbane City Council planning requirements. The report considers the site's ecological values, assesses potential impacts and identifies how development design minimises unwanted impacts where practicable.

The report includes responses to the *City Plan 2014v35* Biodiversity Areas Overlay Code and Waterway Corridors Overlay Code, demonstrating necessary vegetation retention, protection and movement opportunities for fauna, and rehabilitation opportunities. Other supporting information includes a tree retention strategy, recommendations for Arboricultural protection where required, mitigation measures for construction and operation, and a Concept Rehabilitation and Management Plan outlining revegetation, rehabilitation and ongoing maintenance. Overall, 28 South's assessment provides Council with the information requested to demonstrate that ecological constraints have been properly investigated, development is designed appropriately, and measures are proposed to manage impacts and improve ecological outcomes over time.

***2)*** *The proposed development is within a mapped identified koala broad hectare area.*
*a) Provide an assessment against the assessment benchmarks in Schedule 11, Part 3,*

*Section 6 of the Planning Regulation 2017 by a suitably experienced and qualified ecologist.*

## Response

An assessment against *Schedule 11, Part 3, Section 6* of the *Planning Regulation 2017* is prepared by 28 South Environmental and can be found in Section 7.1.2 of the report. 28 South's assessment confirms this site is subject to the *Identified Koala Broad Hectare Area*, and *Core Koala Habitat Area* – CKHA (CKHA positioned in the northern portions). The report confirms that the development footprint has been designed to avoid the mapped CKHA, with development consolidated into areas previously disturbed by the waste transfer station.

Section 7.1.2 of the report confirms that the proposed development satisfies the *Planning Regulation 2017* by retaining highest ecological value areas, maintaining existing local fauna movement opportunities, and avoids introduction of additional barriers to koala movement. The report also confirms that vegetation clearing must be undertaken pursuant to the *Nature Conservation (Koala) Conservation Plan 2017*, to which staged clearing and koala spotter-catcher procedures will be required. Construction management measures are proposed to minimise the risk of injury to koalas during works, while all disturbed areas will be progressively rehabilitated as shown in the prepared *Concept Rehabilitation and Management Plan*. Overall, 28 South's assessment concludes that the proposal complies with the assessment benchmarks for development within an *Identified Koala Broad Hectare Area* by avoiding impacts to mapped Core Koala Habitat, minimising impacts to koala habitat values and incorporating appropriate management and rehabilitation measures throughout the construction and operational phases.

*Vegetation*

3) *Trees within the site are protected by NALL (Significant Native Vegetation, Significant Urban Vegetation, Waterway Vegetation, and Council Vegetation categories). A NALL Permit issued by Council's Arboricultural team (i.e., PSO) will be required to support the removal of protected vegetation or any proposed works within the tree protection zone (TPZ) of protected trees. The Tree Location Plan in the Arboricultural Impact Assessment (AIA) refers to an earlier proposed layout, identifies tree locations as 'indicative only', includes a note that 'All tree retention [is] subject to detailed design', and the majority of trees are shown with an orange symbol to indicate 'tree impact to be confirmed at detailed design stage'. 'In principle' support for tree removal or works within the TPZ of trees cannot be considered until an assessment of current and comprehensive details has been made. An amended AIA is required to inform a revised and more detailed design that responds to existing site features including topography and significant vegetation. The revised design should retain important groups of trees that contribute to local ecological and landscape character values, which in turn will reduce the financial value of 'no net canopy loss' offsets payable as part of the NALL Permit process*
   a) *Provide an amended AIA prepared by a min AQF Level 5 qualified Arborist in*

*accordance with relevant requirements stated in Section 1.7.2 of the Infrastructure design PSP. The AIA must include the following:*

- *i) In addition to Item 1) of the information request, a Tree Survey, surveyed in location, to accurately locate and identify all trees within the site with a dbh of 150mm or larger. The Tree Survey must identify (e.g., colour code) the location of significant vegetation meeting one or more criteria as described in Section 2 of the Vegetation planning scheme policy. The Tree Survey must be overlaid with the proposed site layout and details of earthworks (i.e., extent and depths) to support assessment.*
- *ii) A Tree Schedule providing relevant tree specifications, measurements and health condition notes, and other observations, cross-referenced to the Tree Survey.*
- *iii) Recent clear photos of trees that meet one or more criteria of significant vegetation as described in the Vegetation PSP.*
- *iv) A priority list of significant vegetation trees assessed as being worthy of retention.*
- *v) An assessment of potential development impacts and recommendations to amend the existing proposal to achieve maximum retention of significant vegetation (i.e., individual trees and groups of trees).*
- *vi) Recommendations to inform a revised site layout that maximises the retention of existing significant vegetation and its contribution to the site specific ecological and landscape character values.*

*b) Revise the proposed site layout to ensure the healthy retention of NALL protected vegetation in accordance with the amended AIA.*

*c) The updated AIA will be required for assessment. The AIA must contain a revised Tree Retention Plan (overlaid with the revised site layout and earthworks) and revised Tree Schedule containing recommendations for retention or removal, together with recommendations for tree protection and site-specific construction methodologies as required to ensure the long-term viability of trees to be retained*

<u>Response</u>

The amended Arboricultural Impact Assessment, prepared by an AQF Level 5 Arborist, addresses Council's concerns with the previous assessment. It is based on the proposed development layout and includes all trees with a DBH of 150 mm or greater, with surveyed tree locations shown against the development footprint and earthworks.

The assessment identifies trees for retention, recommends construction changes where needed, and sets out protection measures including Tree Protection Zones, fencing, arborist supervision, vacuum excavation, structural fill requirements, hold points and a Plant Health Care Program. Where removal is proposed, the report identifies the relevant infrastructure constraint and shows vegetation loss has been minimised where practicable. The revised Tree Retention Plan and Tree Recommendations identify retained and removed trees and set out management requirements where necessary.

Overall, the revised Arboricultural Impact Assessment responds to Council's Information Request by updating the assessment, informing the site layout, identifying vegetation to be

retained, and setting out the protection and construction measures needed for Council's assessment and the future NALL permit process.

*Overland Flow*

4) *The proposal is affected by an overland flow path. The flow path is proposed to be realigned to facilitate the works. Flood modelling has not been provided to ascertain whether the proposed realigned channel has adequate capacity to carry the flows without adversely impacting the surrounding properties. Although, the site has adequate area to accommodate an acceptable new flow path through the site, an overland flow assessment needs to be undertaken to ensure the flow path has acceptable capacity and that there will be no flooding impacts on adjoining properties from the proposal. The new culverts under the proposed roadway also need to achieve acceptable capacity. Provide amended plans and additional information in accordance with Performance Outcome PO4 of the Stormwater code that demonstrate the following:*
   *a) Overland flow assessment for the post development scenario.*
   *b) Adequate capacity of the realigned overland flow channel.*

Response

Two reports are submitted for Council's review regarding overland flow. The Stormwater and Flooding Investigation prepared by Bligh Tanner (2023), established the site's existing stormwater network, overland flow paths and flood behaviour. It also identified the site's flood planning levels and provided recommendations for drainage, channel and stormwater treatment upgrades for future detailed design. The Stormwater Quality and Quantity Report prepared by ATC Williams builds on these findings and develops the stormwater quantity, drainage and treatment strategy for the proposed green waste hardstand expansion.

With respect to overland flow, the ATC Williams report assesses stormwater runoff for the proposed staged development by comparing existing and post-development conditions. The assessment includes the existing site and the proposed three stages. It concludes that Stage 1 increases peak stormwater flows by approximately 2%, while the fully developed site would increase peak flows by approximately 10% if no further mitigation measures were provided.

The ATC Williams report concludes that Stage 1 will have only a minor impact on stormwater runoff and that no additional flow attenuation is required for this stage however, Stages 2 and 3, will need to widened and realign the channel, incorporate additional stormwater treatment ponds and install new culverts beneath the proposed roadway to maintain stormwater conveyance and achieve flow conditions consistent with the existing site. (Concept drainage plans for all three stages are included in Appendix A of the ATC Williams report).

The report also recognises that detailed hydraulic design for the realigned channel, culverts and associated drainage infrastructure for Stages 2 and 3 can be addressed when the project 'progresses' to those stages. It is therefore recommended that Council impose conditions requiring further detailed hydraulic assessments as part of any Operational Works submissions associated with Stages 2 or 3 (suggested timing in the stage 2 & 3 permits to be 'prior to commencement of site works').

The Bligh Tanner and ATC Williams reports establish the stormwater management approach for the site and demonstrate that the proposed staged development can be accommodated.

The detailed hydraulic design for the final channel realignment and drainage infrastructure will be completed upon undertaking of stages 2 & 3 and subject to reasonable and relevant conditions.

*Earthworks*

5) *Details about the extents, depth and location of the earthworks have not been provided. Plans illustrating cross sections through the site are required that detail earthworks. Similarly, cross section and longitudinal sections are required for the overland flow path channel in consideration of the acceptable hydraulic capacity. Provide earthworks plans in accordance with PO1 of the Filling and excavation code which illustrate the extent, depth and location of filling and excavation.*

Response

Please find attached an earthworks plan prepared by ATC Williams.

*Stormwater*

6) *A Concept stormwater plan is required detailing drainage for the proposed hard stand area and any other proposed works. Provide a concept Stormwater design for the proposed works, including lawful point of discharge in accordance with PO3 of the Stormwater code.*

Response

The Stormwater Quality and Quantity Report prepared by ATC Williams provides a concept stormwater plan for the proposed green waste hardstand expansion. The report indicates how stormwater from the new hardstand areas will be collected, treated and discharged from the site. Concept drainage plans for all stages are included.

In terms of Stage 1, the report proposes new drainage, swales and a bioretention basin to collect and treat stormwater before it enters the existing drainage system. The assessment concludes that these works are sufficient to manage runoff from Stage 1 and that no additional flow attenuation is required (also discussed above).

For Stages 2 and 3, the report identifies further drainage works determined as necessary (for associate works in those stages). These works include extending and realigning the existing drainage channel, constructing additional treatment ponds and installing new culverts beneath the proposed roadway.

The report confirms that stormwater from all stages will continue to discharge through the to an existing lawful point of discharge. Overall, the report provides a concept stormwater design that demonstrates how runoff from the proposed works will be managed. The detailed design of the drainage infrastructure will be completed as part of the Operational Works stage.

*Bushfire*

7) *The site is mapped within a Bushfire Hazard Area in the State's Natural Hazards, Risk and Resilience mapping.*
   a) *Provide an assessment against the SPP Assessment Benchmarks for Natural*

*Hazards, Risk and Resilience. City Plan's Bushfire overlay code can be used as a means of demonstrating compliance with these benchmarks. Additionally, the Queensland Government has recently published SPP guidance material to assist in demonstrating compliance with the assessment benchmarks.*

Response

The Bushfire Management Report (BMR) responds to Council's request by assessing the proposal against the *State Planning Policy (SPP) Natural Hazards, Risk and Resilience* assessment benchmarks and the *Brisbane City Plan 2014 Bushfire Overlay Code*. The report confirms that, although part of the site is mapped as a bushfire hazard area, the proposed development can achieve an acceptable level of bushfire safety.

The BMR includes a site inspection to confirm the mapped bushfire hazard, surrounding vegetation, ground conditions, and slope. The assessment found that the areas proposed for development retain a low bushfire hazard risk.

The BMR outlines measures to reduce bushfire risk. These include maintaining separation from hazardous vegetation, ongoing vegetation management, provision of firefighting infrastructure and maintenance of fire trails. BMR also anticipates that areas included in the proposed development will be exposed to a maximum Bushfire Attack Level (BAL) of 12.5, which is determined as appropriate.

The report assesses the proposal against each of the SPP bushfire assessment benchmarks and concludes that the development manages bushfire risk, allows for emergency access and response, and does not increase the bushfire hazard.

*Proposed Plans*

8) *To assist in the calculation of infrastructure charges, provide proposed plans comparing existing and proposed impervious area.*

Response

Please find a comparison between existing and proposed green waste expansion areas (3 stages). The proposed impervious areas are as follows:

- Stage 1 Green waste expansion – 6,995.6sqm
- Stage 2 Green waste expansion – 7,068sqm.
- Stage 3 Green waste expansion – 3,914.5sqm.
- Staff Amenities – 108sqm.
- Public Amenities – 5.8sqm.
- Additional roads/lanes -

Yours sincerely

**Matthew Taylor**
**DIRECTOR**