Submission of Objection to Development Application MCU26/0142

156-170 Fitzroy Street, Cleveland QLD

To: Redland City Council

I write to formally object to Development Application MCU26/0142 for the proposed Multiple Dwelling development comprising 38 residential units at 156-170 Fitzroy Street, Cleveland.

This objection is based on significant conflict with the Strategic Framework, Environmental Significance Overlay Code, biodiversity and koala protection outcomes, transport network outcomes, neighbourhood character provisions, residential amenity provisions and multiple dwelling assessment benchmarks contained within the Redland City Plan 2018.

The proposal represents an excessive and inappropriate intensification of the site that will adversely impact environmental values, wildlife habitat, koala movement, neighbourhood character, residential amenity and local transport conditions. When assessed cumulatively, these impacts strongly support refusal of the application.

#1 Conflict with the Strategic Framework

The Strategic Framework of the Redland City Plan 2018 seeks to balance accommodating growth while protecting environmental values, biodiversity, local character and community amenity. The proposal fails to achieve this balance.

The proposed 38-unit development represents an intensive urban form that prioritises residential yield over the protection of environmental assets and neighbourhood character. The scale, density and associated impacts are inconsistent with the Strategic Framework's intent to ensure development occurs in a manner that protects the environmental qualities that distinguish Redland City.

The cumulative impacts of vegetation loss, habitat fragmentation, increased traffic generation, increased urbanisation and loss of ecological function are inconsistent with the strategic outcomes sought by the planning scheme.

#2 Conflict with Environmental Significance Overlay Code (Part 8.2.4)

The purpose of the Environmental Significance Overlay Code is:

"to manage development to avoid or minimise and mitigate significant impacts on matters of national, state and local environmental significance."

The proposal conflicts with the purpose and intent of the code because it increases development pressure on environmentally significant land through:

- Vegetation removal.
- Habitat fragmentation.
- Increased human activity.
- Increased vehicle movements.
- Increased disturbance of wildlife habitat.
- Increased edge effects on surrounding vegetation.

The Overlay seeks to protect native vegetation, wildlife habitat and ecological connectivity. The application fails to adequately demonstrate that ecological values will be protected, enhanced or maintained over the long term.

#3 Vegetation and Tree Canopy Loss

A major deficiency of the proposal is the loss of vegetation and reduction in established tree canopy.

The removal of mature vegetation is contrary to the landscape and environmental objectives of the City Plan. Mature canopy trees provide:

• Wildlife habitat.

• Koala food sources.

• Wildlife movement opportunities.

• Urban cooling benefits.

• Visual screening.

• Landscape character.

• Ecological connectivity.

These values cannot be adequately replaced through small-scale replacement landscaping associated with a high-density residential development.

The reduction in canopy cover will diminish environmental values, contribute to urban heat effects and substantially alter the established green suburban character of Fitzroy Street.

The proposal therefore conflicts with the broader environmental, landscape and biodiversity outcomes sought by the Redland City Plan 2018 4. Conflict with Biodiversity and Koala Habitat Protection Outcomes The Redlands is recognised as one of South East Queensland's most important koala landscapes. Protection of biodiversity and koala habitat is a central component of Council's environmental planning framework The proposal raises significant concerns because:

• Vegetation loss reduces available habitat.

• Habitat fragmentation limits wildlife movement.

• Increased residential activity diminishes habitat quality.

• Increased lighting and disturbance affect native fauna.

• Ecological values will be progressively reduced through urbanisation pressures.

The proposal has not demonstrated how environmental values will be maintained or enhanced as required by the Environmental Significance Overlay and broader biodiversity outcomes of the planning scheme.

#4 Loss of Wildlife Corridor Function and Ecological Connectivity

Council's wildlife corridor framework recognises the importance of maintaining ecological connections throughout Redlands Coast.

The proposal risks:

• Further habitat fragmentation.

• Reduced wildlife movement opportunities.

• Loss of future restoration opportunities.

• Reduced ecological resilience.

• Increased isolation of remaining habitat patches.

Even where existing habitat values may be fragmented, the site remains important because of its contribution to broader landscape connectivity. The development does not adequately demonstrate how wildlife movement opportunities will be maintained or enhanced.

This is directly contrary to the intent of Council's biodiversity and wildlife corridor objectives.

#5 Conflict with Koala Conservation Outcomes

The proposal introduces a significant cumulative increase in vehicle movements within an area known to support koalas and other native wildlife.

Vehicle strike remains one of the most significant causes of koala injury and mortality.

The introduction of 38 new dwellings will inevitably increase vehicle movements associated with residents, visitors, contractors, service vehicles, deliveries and rideshare activity.

Every additional vehicle movement increases the probability of wildlife vehicle collisions.

The proposal fails to demonstrate how the increase in traffic generation will avoid, minimise or mitigate the increased risk of koala mortality caused by vehicle strike.

The applicant has not demonstrated a net environmental benefit sufficient to offset this increased threat to koala populations.

#6 Conflict with Transport and Movement Network Outcomes

The Strategic Framework seeks a safe and efficient transport network that protects community amenity and minimises adverse impacts.

The proposal will generate substantially more vehicle trips than the existing use of the site and will result in:

• Increased traffic volumes.

• Increased turning movements.

• Greater conflict points.

• Additional pressure on local intersections.

• Increased safety risks for pedestrians and cyclists.

• Increased wildlife road-strike risk.

• Increased pressure on local infrastructure. The proposal has not adequately demonstrated that Fitzroy Street and the surrounding transport network can absorb these impacts without detrimental consequences.

#7 Parking and Local Congestion Impacts

The proposal is likely to generate parking demands beyond the practical capacity of the site due to resident, visitor, contractor, delivery and service vehicle requirements.

This creates the risk of:

• Overflow on-street parking.

• Increased congestion.

• Reduced accessibility.

• Impacts on emergency vehicle access.

• Loss of residential amenity.

Such outcomes are inconsistent with maintaining the existing residential function of surrounding streets.

#8 Conflict with Neighbourhood Character Outcomes

The existing character of Fitzroy Street is dominated by detached residential dwellings with generous setbacks, extensive landscaping, mature vegetation and open space.

The proposed multiple dwelling development introduces a scale, density and built form that is materially different from the established character of the surrounding area.

Rather than complementing the existing neighbourhood, the proposal introduces a visually dominant urban form that would fundamentally alter the character of the locality.

Approval would establish an undesirable precedent for further intensification and progressively erode the character that existing residents reasonably expect the planning scheme to protect.

#9 Excessive Density and Overdevelopment

The proposed density represents an overdevelopment of the site.

The intensity of development exceeds what can reasonably be accommodated while

maintaining:

• Environmental values.

• Habitat connectivity.

• Landscaping dominance.

• Residential privacy.

• Neighbourhood character.

• Residential amenity.

The proposal appears driven by dwelling yield rather than achieving a balanced planning outcome.

The excessive density results in a built form that is inconsistent with the intended character of the locality and places unreasonable pressure on both the site and surrounding infrastructure.

#10 Excessive Visual Bulk and Streetscape Impacts

The proposal creates significant visual impacts through:

• Excessive building bulk.

• Large building massing.

• Extensive hardstand areas.

• Increased dominance of built form.

• Reduced landscaping prominence.

• Urbanisation of the streetscape.

The development will materially alter the visual character of Fitzroy Street and diminish the established green suburban environment that currently contributes to local identity and attractiveness.

The proposal represents visual overdevelopment of the land.

#11 Loss of Residential Amenity

The proposal will adversely affect neighbouring properties through:

• Increased traffic noise.

• Increased residential activity.

• Greater population density.

• Overlooking opportunities.

• Loss of privacy.

• Additional lighting impacts.

• Loss of outlook.

• Visual intrusion.

• Reduced sense of openness.

These impacts collectively represent a significant reduction in the amenity enjoyed by adjoining residents and are inconsistent with the planning scheme's intent to protect established residential neighbourhoods.

#12 Cumulative Planning Impacts

While individual impacts may be argued to be acceptable in isolation, the Planning Act requires consideration of the cumulative consequences of development.

The cumulative impacts of this proposal include:

• Vegetation loss.

• Reduction in tree canopy.

• Habitat fragmentation.

• Loss of koala habitat.

• Reduced wildlife connectivity.

• Increased koala road-strike risk.

• Increased traffic generation.

• Increased parking demand.

• Visual bulk and dominance.

• Loss of neighbourhood character.

• Noise impacts.

• Loss of residential amenity.

Collectively, these impacts demonstrate that the proposal represents an excessive and inappropriate form of development that is fundamentally inconsistent with the planning intent of the Redland City Plan 2018.

Procedural and Assessment Concerns

Council should carefully consider whether:

• All ecological assessments adequately address koala habitat and wildlife movement.

• Traffic modelling properly accounts for cumulative vehicle movements.

• Information Request responses have fully addressed environmental concerns.

• Ecological reports align with vegetation clearing proposals.

• The Environmental Significance Overlay requirements have been comprehensively addressed.

• The applicant has demonstrated genuine compliance rather than merely asserting compliance with the planning scheme.

Any unresolved deficiencies should weigh against approval.

Additional Matters for Council's Consideration In determining this application, I respectfully submit that Council should not rely solely upon the applicant's planning, traffic and ecological assessments. To properly understand the full environmental, biodiversity, character and amenity implications of the proposal, Council should give careful consideration to the following information and

evidence:

• Koala habitat mapping relevant to the subject land and surrounding locality.

• Environmental Significance Overlay mapping affecting the site and adjoining land.

• Current and historical aerial photography demonstrating vegetation extent, habitat connectivity and canopy cover.

• Existing vegetation surveys identifying mature habitat trees and ecological values present on the site.

• Wildlife sighting records for koalas and other native fauna within the locality.

• Records of reported koala vehicle strikes within the surrounding road network.

• Photographic evidence of the established tree canopy and landscape character of Fitzroy Street and surrounding streets.

• Photographic evidence demonstrating the prevailing low-density residential character of the locality.

• Existing examples of detached housing development that establish the neighbourhood character intended to be protected under the Redland City Plan 2018.

• Identification, assessment and independent verification of any habitat trees or significant vegetation proposed to be removed or impacted by the development.

These matters are directly relevant to the assessment of biodiversity values, wildlife movement opportunities, environmental significance, neighbourhood character, visual amenity and the cumulative impacts of development. They will assist Council in determining whether the proposal genuinely achieves the outcomes sought by the Redland City Plan 2018 or whether it results in unacceptable environmental and community impacts.

Further, where uncertainty exists regarding the extent of environmental impacts, koala habitat values, wildlife movement patterns or cumulative road-strike risks, Council should adopt the precautionary approach and give substantial weight to the protection of environmental values and biodiversity assets that may be permanently lost if the development proceeds Requested Outcome For the reasons outlined above, the proposal conflicts with:

- The Strategic Framework of the Redland City Plan 2018;
- The Environmental Significance Overlay Code;
- Biodiversity and habitat protection outcomes;
- Wildlife corridor and koala conservation objectives;
- Transport network outcomes;
- Neighbourhood character provisions;
- Residential amenity provisions; and
- Multiple dwelling assessment benchmarks.

The proposal represents an excessive and inappropriate intensification of development that will result in unacceptable environmental, ecological, traffic, visual and residential amenity impacts.

Accordingly, I respectfully request that Redland City Council refuse Development Application MCU26/0142.

Should Council be minded to approve the proposal, I request that Council require a substantial redesign that significantly reduces dwelling numbers, retains mature vegetation and canopy trees, protects koala habitat and wildlife corridors, minimises traffic generation and ensures compatibility with the established neighbourhood character and amenity of Fitzroy Street and the surrounding locality.

Your name

Your address

Date of submission