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Your Ref:
Our Ref: 26116 IR

27 August 2025

Nicholas Kelly
Senior Consultant, Urbis
via email:

Dear Nicholas,

RE: LOGAN CITY COUNCIL INFORMATION REQUEST APPLICATION NO: MCUI/16/2025

I refer to the Logan City Council's information request associated with the abovementioned application, and in particular, Item 3 relating to bushfire hazards:

3.1. Submit an amended Bushfire Hazard Assessment and Management Plan that:

3.1.1. Shows asset protection zones that are wholly located on the subject site; and

Advice Note: Figure 7 of the Bushfire Hazard Assessment and Management Plan depicts asset protection zones that encroach into adjoining properties and road reserve. To demonstrate compliance with Acceptable Outcome (AO3.b) of the Bushfire hazard overlay code, asset protection zones must be located on the same lot.

3.1.2. Further considers the bamboo plantation to the north of the proposed development.

Advice Note:

Vegetation present on the site adjoining the north of the development is described as a plantation of exotic bamboo. Council officers associated this description of vegetation with Vegetation Hazard Class (VHC) 36.1 – Exotic & hardwood plantation in accordance with VHC descriptions within Bushfire Resilient Communities.

The Bushfire Hazard Assessment and Management Plan should further justify why the vegetation to the north is not considered hazardous vegetation or demonstrate how the proposed development provides adequate setbacks to the hazardous vegetation.

We have carefully considered the information requested by the Council on provided the following responses:

- Figure 7 of the Bushfire Hazard Assessment and Management Plan (BHAMP) erroneously depicts asset protection zones that encroach into adjoining properties and road reserve. The purpose of Figure 7 in the BHAMP was to demonstrate that the proposed development did not otherwise result in clearing for bushfire protection that would otherwise result in prohibited development¹ under the *Planning Regulation 2017* (Qld). As set out in Section 6 of the Plan, the extent of bushfire prone areas approximates the extent of both the planning scheme Bushfire Hazard Overlay and the SPP map of bushfire prone areas. To be clear:
 - Physical separation for asset protection is only required between the asset (buildings) and bushfire-prone areas, which are located to the south-east of the proposed buildings (Figure 1).
 - No vegetation clearing or asset protection zones are required within the adjoining properties or road reserve for bushfire protection (Figure 1).
- The assertion that the patch of exotic bamboo, which is located on the adjoining land, should be classified as VHC 36.1 – Exotic & hardwood plantation is incorrect. It represents a misapplication of the guidance material. Firstly, exotic bamboo is not a fire-prone species. Secondly, the underlying data used to calculate the 80th percentile long-term unburnt condition potential fuel load for VHC 36.1 is derived from measurements of fuel loads within exotic *Pinus* spp. plantations in Queensland. Despite this, the proposed building is otherwise separated from the patch of bamboo on the adjoining land by at least 9 m.

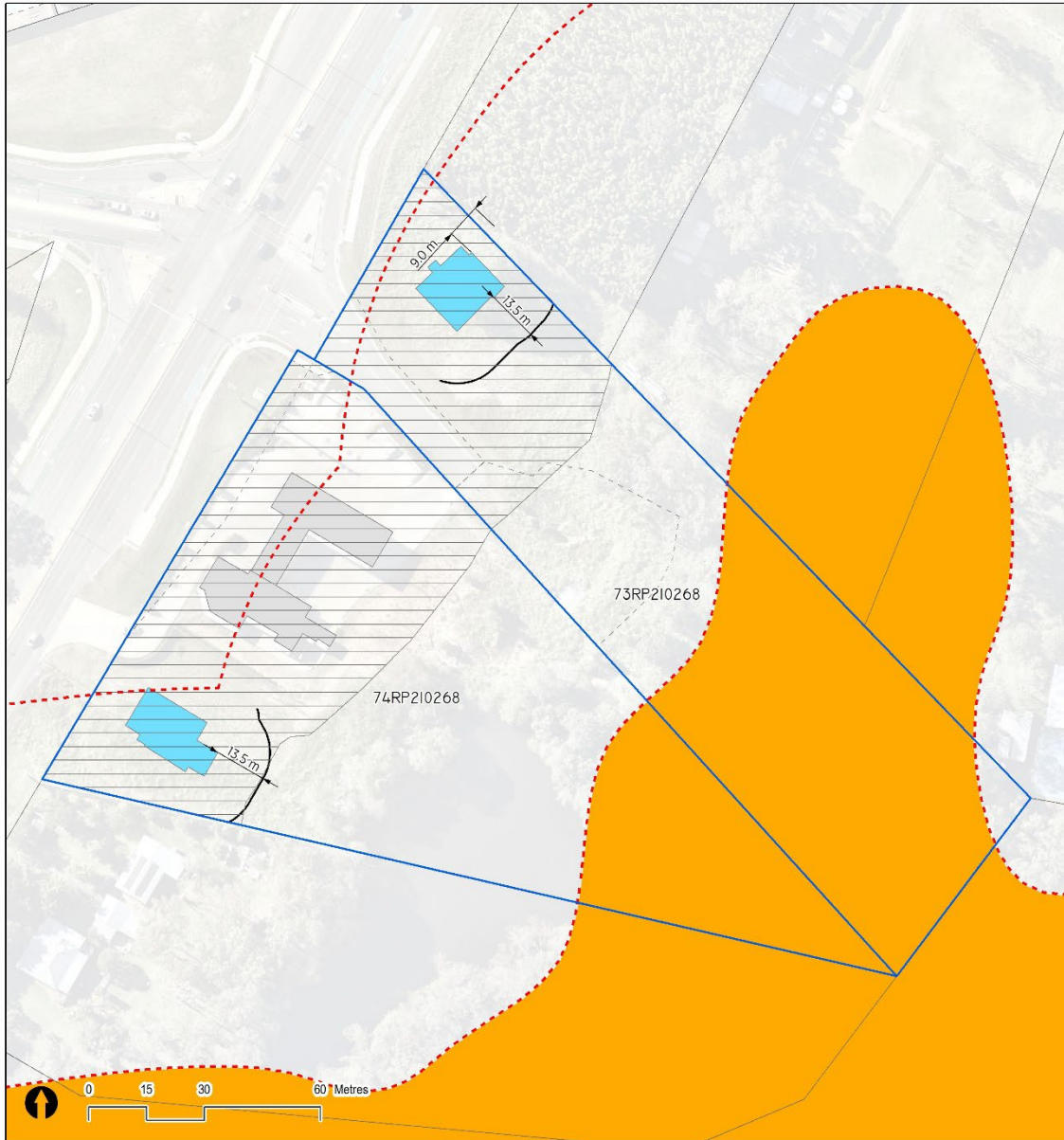
I trust that the response addresses the Council's issues and that the development application can be approved without further delay. If you have any matters you would like to discuss, please do not hesitate to contact me.

Sincerely,



Daniel Clowes BAppSc (EnvSc) DipArb MEIANZ MESA MISA
Director

¹ Interfering with koala habitat in a koala priority area.



Legend

Subject land

Site Assessment Area

Cadastre

Lot boundary

Easement

Bushfire Prone Area

CLASS

Very High Potential Bushfire Intensity

High Potential Bushfire Intensity

Medium Potential Bushfire Intensity

Potential Impact Buffer

Changed Plans - Development

Proposed development area

Proposed building

Existing building

Asset Protection Zone

1:1,000

Date Created: 27/08/2025

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Verve Building Design Co. Architectural Drawings Revision B (06/08/2025)

FIGURE 1: MAP OF BUSHFIRE PRONE AREAS, PROPOSED DEVELOPMENT AND ASSET PROTECTION ZONES.