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APPLICATION REF  
A006963393

**I.B. Town Planning**

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2 September 2026

The Chief Executive Officer  
Brisbane City Council  
GPO Box 1434  
Brisbane Qld 4001

**Attention: Mohammed Aslam**

Dear Mohammed,

**RE: DEVELOPMENT APPLICATION FOR RECONFIGURING A LOT  
85 PRIESTLEY ROAD, BRIDGEMAN DOWNS  
COUNCIL APPLICATION NUMBER: A006963393**

I refer to the above application and Council's Information Request letter dated 24 March 2026. In response to the issues raised in Council's letter, the following information is provided:

**Minimum Lot Sizes**

1. Please find attached an assessment of the proposed subdivision against the following provisions of the Strategic Framework:
  - a) Theme 2: Brisbane's outstanding lifestyle, Element 2.2 — Brisbane's housing and accommodation choices; and
  - b) Theme 3: Brisbane's clean and green leading environmental performance, Element 3.1 — Brisbane's environmental values.

Having regard to the proposed lot sizes and the pattern of development within the surrounding area, it is noted that the proposed lots range in size from 7,499sqm to 8,961sqm, and are consistent with the following recent Council approvals:

- 11 Priestley Road: 8,460sqm (Approval A004166249)
- 19 Priestley Road: 8,431sqm (Approval A004166249)
- 8 Neville Road: 7,354sqm, 8,434sqm & 2,884sqm (Approval A005861925)

**Ecology Values**

2. Please find attached updated proposal plans for the subdivision which show a 2,500sqm development footprint for each lot as requested, which will include all necessary development features for each lot including a dwelling house and associated outbuildings, access and driveways, and open space areas (including swimming pool). As detailed on the overall site plan, the proposed development footprints are located outside of the Biodiversity Areas Overlay. Therefore, a further detailed assessment of trees located within the development footprints will not be necessary in this instance as the development footprints are located outside of the Biodiversity Area Overlay as well as State vegetation mapping layers (including MSES, Regulated Vegetation and Koala Habitat).

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## **Bushfire**

3. Please find attached a Bushfire Management Plan that has been prepared by Queensland Bushfire Planning that provides an assessment of the bushfire hazard for the proposed new lots, along with an assessment of the Bushfire Hazard Overlay Code. The assessment has determined that the Bushfire Attack Level (BAL) for the site is "LOW" and has an acceptable level of risk with regards to people or property being exposed to harm in the event of a bushfire.

Section 5 of the report includes bushfire hazard and risk management measures that have been incorporated into the design of the proposed development, combined with the implementation of additional recommended measures during the construction and occupational phase of the development, which will ensure that compliance is achieved with the Brisbane City Plan 2014 - Bushfire Hazard Overlay Code.

## **Significant Vegetation**

4. While it is acknowledged that there is vegetation located within the southern portion of the site, it is important to note that this vegetation is located outside of the Biodiversity Area Overlay under the City Plan 2014, as well as State vegetation mapping layers (including MSES, Regulated Vegetation and Koala Habitat).

The proposed subdivision has been designed to create usable development footprint areas that are outside of the relevant vegetation overlays, which ensures that all mapped vegetation on the site is retained and protected. The detail survey attached to the proposal plans identifies that there are 12 trees located within the development footprint areas, most of which sit comfortably alongside existing buildings and infrastructure on the site. It is proposed that existing trees will be retained on each lot in order to allow choice for future land owners. That being said, we reiterate that the trees located within the development footprint areas are not mapped under relevant vegetation overlays and there should be no constraint to their removal if desired by the landowner.

The provision of an arborist report to address trees located within the development footprint areas is therefore not necessary in this instance.

## **Lawful Point of Discharge**

5. A lawful point of discharge is provided at the northern end of each lot, being the waterway corridor and associated easement (Emt A on RP846747) that discharges stormwater flow into the South Pine River. Stormwater discharge from the development footprint on each lot will therefore be directed to this easement and waterway corridor as the lawful point of discharge, which is what currently happens with the existing dwelling.

## **Building Envelope Area**

6. Please find attached updated proposal plans for the subdivision which show a 2,500sqm development footprint for each lot, which are located above the flood planning level for the site (9.0m AHD), and outside of the Biodiversity Area Overlay and State vegetation mapping layers (including MSES, Regulated Vegetation and Koala Habitat).

## **Engineering Report**

7. Having regard to the matters raised in this item, the following information is provided:
    - a) The provisions of the relevant codes have been addressed in the town planning report provided with the application;
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- b) No earthworks are proposed, or required, for the subdivision as:
    - i. The 2,500sqm development footprint area for each lot is located above 10m AHD and is therefore above the flood planning level for the land;
    - ii. Each lot grades naturally to the north towards the lawful point of discharge;
    - iii. The existing dwelling and associated outbuildings will be retained on proposed Lot 31, so no additional site works are required; and
    - iv. Proposed Lot 32 contains suitable grades for the construction of a dwelling in the proposed development footprint, so no site works will be required for the development footprint on this lot.
  - c) The site is not located within an area that has reticulated sewer available, so engagement with Urban Utilities to provide a SAN Notice is not necessary. The development footprint on each lot has sufficient area for a domestic on-site sewerage treatment system;
  - d) The site is located within the Rural Zone and each lot will be provided with services as follows:
    - i. Water: an additional property connection will be provided for proposed Lot 32 from the water service currently provided within the access handle from Priestley Road. A connection application will be made to Urban Utilities on receipt of Council's subdivision approval;
    - ii. Sewer: no reticulated sewer is available within the area. The existing on-site treatment system for the house on Lot 31 will be retained, and a new house on Lot 32 will also be provided with a domestic on-site treatment system;
    - iii. Stormwater: Stormwater discharge from the development footprint on each lot will be directed to the easement and waterway corridor at the northern end of each lot, as the lawful point of discharge. This will only require internal drainage works for a future house on Lot 32, and no operational works or inter-allotment drainage;
    - iv. Electrical: an additional property connection will be provided for proposed Lot 32 from the underground electricity service currently provided within the access handle from Priestley Road. A connection application will be made to Energex on receipt of Council's subdivision approval; and
    - v. Telecommunications: an additional property connection will be provided for proposed Lot 32 from the underground NBN service currently provided within the access handle from Priestley Road. A connection application will be made to NBN Co on receipt of Council's subdivision approval.

As the proposed reconfiguration relates to the subdivision of an existing lot that has all available services provided to the boundary of the site, and the existing site grades allow for the continued conveyance of stormwater to the point of discharge within the lots, an engineering report is not considered to be necessary in this instance where services do not need to be extended to the site, or earthworks necessary to create a development footprint above the adopted flood planning level.

### **Easement Details**

- 8. Please find attached an amended DA Form 1, that includes all lots within the application that are subject to reciprocal access easements C, D and E, as well as including proposed access easements L and M. Please note, the proposal plan has been updated to show that there will be no reconfiguration of the existing easements, or the existing access handles for the lots. Rather, the existing access handle and Easement D will remain wholly within proposed Lot 32, and new reciprocal access easements L and M will be created within Lots 31 and 32 respectively.
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While the proposed change to include additional land in the application is not a Minor Change, in accordance with Section 26(1) of the DA Rules, the development assessment process for this application will not stop as a result of the change where Council as the assessment manager is satisfied that the change is consistent with these provisions, as the change has been made in response to Council's information request.

New Easements L and M will be created in addition to existing Easements C, D and E to cater for shared access and manoeuvring for Lots 31 and 32 at the end of the access handle.

Having regard to the issue of landowner consent, the written consent of the owners of Lot 4 on RP849763 (Emt C) and Lot 2 on RP849763 (Emt E) is not required as these easements are Excluded Premises pursuant to Section 51(2)(c) of the *Planning Act 2016*. Specifically, these lots are servient tenements for the easements, and the proposed development is consistent with the easement's terms, which is stated as being for "right of way" (i.e. access). As all of these easements were created for the purpose of providing shared and reciprocal access when Survey Plan RP849763 was registered, their terms and construct are identical.

While the subdivision may result in the volume of the traffic increasing that uses these easements, the use of the easements for access purposes to and from the Dominant Tenement remains unchanged. Accordingly, as the use of the easements resulting from the subdivision will remain unchanged, the proposed development is therefore consistent with the easement's terms and the lots containing these easements are therefore Excluded Premises as defined by the *Planning Act 2016*. Please note that this issue was recently tested in Planning and Environment Court appeal 2665/25 where the Court found that Council's acceptance of an application being properly made was correct, where adjoining lots that were party to shared access easements were Excluded Premises pursuant to Section 51(2)(c) of the *Planning Act 2016*.

### **Kerbside Collection**

9. Refuse bins for the additional lot will be placed at the kerb in Priestley Road on collection days. The refuse bins from Lots 3, 4 and 5 are currently taken from each dwelling via the rear access driveway to the kerbside in Priestley Road for collection. As the lots fronting Priestley Road are rural lots with substantial road frontages, and the lots already have shared access arrangements, the placement of the wheelie bins at the kerb in Priestley Road for the additional lot will maintain consistency with the current waste collection arrangements and not have any adverse impact on adjoining properties. The length of road frontage available to Lot 5 also ensures that bins are placed to the north of the existing access crossovers and well clear of driveways, services and other obstructions.

I trust this information is sufficient to address the issues raised in Council's correspondence. This response is provided as a full response under the *Planning Act 2016* and the application will now proceed to the Notification stage.

Should you require any further information, I can be contacted on 3480 5066 or 0402 355 440.

Yours faithfully,



Ian Buchanan  
**Planning Consultant**