



**City Planning & Sustainability
Development Services**

Brisbane Square, 266 George Street, Brisbane Qld 4000

GPO Box 1434 Brisbane QLD 4001

T 07 3403 8888

www.brisbane.qld.gov.au

Dedicated to a better Brisbane

12 December 2019

Emaas Investments Pty Ltd
c/- Buckley Vann Planning + Development
PO Box 205
FORTITUDE VALLEY QLD 4006

Attention: Conrad Taylor
Application Reference: A004600399
Address of Site: 419 MILES PLATTING RD ROCHEDALE QLD 4123

Dear Conrad

RE: Further advice

Thank you for your response to Council's further advice received 24 September 2019. This response has now been fully reviewed and the ecological issues previously raised are not considered to have been fully addressed. Please consider the following advice and provide suitable documentation to allow further assessment and determination of the proposal:

Ecology

1. The amended plans (tree retention and bushfire) do not show development for the property at 441 Miles Platting Rd. They only show the property at 419 Miles Platting Rd. The ecology and bushfire plans and reports need to address both properties.
2. As previously requested, amend all plans (including the proposed sub-precinct plan) to precisely show the location of the mapped City Plan 2014 Waterway corridor overlay.
The most recent plans only show 419 Miles Platting Rd and need to include 441 Miles Platting Rd also. The plans are to show all proposed development areas removed from the Waterway corridor area. The mapped waterway corridors will be required to be rehabilitated for ecological purposes and dedicated to Council as public land (drainage reserve).
3. As previously requested, show the waterway fringe area on the development plans, adjoining the core waterway corridor, in accordance with AO14.1 and Figure b of the Rochedale urban community neighbourhood plan code. Waterway fringe areas can accommodate certain types of development, such as esplanade roads, stormwater infrastructure, bushfire management buffers, pathways etc, and will be required to be dedicated to Council.
4. The proposed extension of the residential precinct into the eastern end of the property at 419 Miles Platting Rd (Environmental management zone) is still not considered to be compliant with the Environmental management zone code, the Biodiversity areas overlay code and the Rochedale urban community neighbourhood plan code and is not supported. Amend the drawings to remove all proposed development from this area.

5. The proposed extension of the Gateway Civic sub-precinct onto the western end of the property at 419 Miles Platting Road (Environmental management zone) is supported in principle under the Biodiversity areas overlay code and the Environmental management zone code, subject to the following limitations:

- a) Council will support a development intrusion of up to 5,000m² into this property (including all development impacts such as buildings, roads, driveways, services, stormwater basins, bushfire management buffers etc), as shown on Figure 1 (attached). Driveways and car parks may be included in the bushfire management zone (subject to future detailed design assessment).
- b) The remainder of 419 Miles Platting Road will be required to be rehabilitated for ecological purposes in accordance with PO3 & PO6 of the Biodiversity overlay code, PO4 and PO5 of the Rochedale urban community neighbourhood plan code, and the Environmental management zone code.

Please note – the Biodiversity areas overlay code has been amended since this application was lodged. This assessment has been carried out under v04.00/2016 of City Plan 2014 and PO/AO numbers do not match the current version.

- c) The waterway corridor area on both sites will be required to be dedicated to Council as drainage reserve as previously stated.
- d) The ecological area on 419 Miles Platting Road (balance of the site outside the 5,000m² development footprint and waterway corridor) will be required to be dedicated to Council for conservation purposes at no cost to Council.
- e) The waterway fringe area on 419 Miles Platting Road will be required to be dedicated to Council as part of the ecological area described in point d) above. The waterway fringe area on 441 Miles Platting Road will be required to be developed for public uses and serve as fringe waterway and bushfire management functions. Future development in this waterway fringe area will be limited to pedestrian/cycle pathways, roads, stormwater infrastructure and public open space uses.
- f) As previously advised, the proposed temporary crossing of the waterway corridor on 441 Miles Platting Road is not supported on ecological grounds due to the impacts that the road will have on the ecological values of the waterway corridor (loss of ecological land and revegetation area, partial barrier to fauna movement etc).

Bushfire

The preliminary approval will not include the identification of any bushfire management zones and future development may require bushfire assessment to be carried out as part of any future development application (the assessment will need to be specific to the location of the development within the site and the detailed design of the development proposed).

The following is provided for your information only to assist with the preparation of future development applications:

The Bushfire reporting provides assessments of radiant heat exposure limits to the proposed development areas from various potential aspects of bushfire attack. Whilst this approach to calculating radiant heat exposure is correct, some of the more detailed calculations within the assessment provided will require amendment for submission with future development applications.

The bushfire attack scenario B is based on a potential fire run of 200m, exceeding the allowable run of 150m in order to justify the use of the *Short Fire Run Methodology for Assessing Bush Fire Risk for Low Risk Vegetation* (Delany, Boverman and Matthews, 2017). Additionally, bushfire

attack scenario B models a fire run from the east for 'potential development area A', however no westerly bushfire attack scenario for 'potential development area B' in the east of the allotment.

Bushfire attack scenario C is suitable for use of the short-fire run methodology, however the wind speed used is not in accordance with the methodology. The *Short Fire Run Methodology for Assessing Bush Fire Risk for Low Risk Vegetation* (Delany, Boverman and Matthews, 2017) utilizes a design wind speed of 30km/h to calculate the shape of the ellipses, whereas the 45km/h wind speed used in the calculations is suitable in AS3959 for rate of spread models involving shrub, heath and moorlands. A revised short fire run assessment is required that uses a wind speed of 30km/h to determine potential breadth of the fire.

A potential bushfire attack scenario from the south (scenario D) may exceed 150m based on connectivity to vegetation to the south which has the potential to develop a fully developed fire. As per the *Short Fire Run Methodology for Assessing Bush Fire Risk for Low Risk Vegetation* (Delany, Boverman and Matthews, 2017), the assumptions and limitations of the method are that a potential fire run up to 150m starts from a single point of ignition. As vegetation immediately south of the site is connected to vegetation further south, there is potential for a fully developed fire or fire to not be started from a single point of ignition (i.e. line ignition through embers). A revised bushfire assessment is required which does not utilize a short fire run method for the southern aspect for potential development area A.

Future development applications will need to provide a revised bushfire report that avoids the use of short fire-run methods for potential fire runs exceeding 150m (as detailed above), calculates bushfire breadth based on a 30km/h wind speed (where short fire run is appropriate), and examines a bushfire attack from west for proposed development area B.

Please phone me on telephone number below during normal business hours if you have any queries regarding this matter.

Yours sincerely



Helen Danalis
Senior Urban Planner
Planning Services East
Phone: (07) 3403 6564
Email: edaeast@brisbane.qld.gov.au
Development Services
Brisbane City Council

Att: Figure 1



Figure 1: Extension to Gateway Civic sub-precinct