

Our ref: STP4020
Contact: Alex Steffan | alex@steffanharries.au
Website: www.steffanharries.au
Phone: 07 3317 0042



Wednesday, 20 May 2026

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

Attention: Dominic Hudson
Via email: DSPlanningSupport@brisbane.qld.gov.au

RE: RESPONSE TO FURTHER ADVICE

Multiple Dwelling
COUNCIL REF: A006554828
109 Beck Street, Paddington QLD 4060
Lot 1008 on SL5674

Dear Dominic,

I refer to the Further advice notice received from Brisbane City Council dated 17th of October 2025 in relation to the development application lodged for a Multiple Dwelling at 109 Beck Street, Paddington. On behalf of the applicant, Steffan Harries provides the following response in addition to the following attachments:

- **Appendix A** – Civil engineering plans
- **Appendix B** – Updated flood report
- **Appendix C** – Structural engineering plans
- **Appendix D** – Certifiers advice
- **Appendix E** – Traffic engineering report
- **Appendix F** – Updated landscape intent plan
- **Appendix G** – Updated architectural plans

1. Reconfiguration of Lot (ROL)

- a) The further issues response identifies the proposed ROL may be accommodated, however outlines that volumetric lots, common property and/or easement arrangements will be required.
 - i. Provide revised subdivision plans to include the volumetric lots, common property and/or easements. Where a volumetric common property is sought, it must extend to the underside of any building suspended over/near the overland flow

path (to ensure undercroft areas can convey floodwaters), or the PMF level, whichever is higher.

- b) The proposed subdivision plan dated 30 July 2025 prepared by the Architect is not consistent with the plan of the same drawing number in the Flood Report. The subdivision plan is required to clarify all areas of common property for each level, i.e., both the ground level, (including the undercroft) and the upper level (the access aisle/unit level).

The proposed subdivision plan should be prepared by a QLD registered cadastral surveyor to accurately show each of the levels of development, to be presented in building format plan standard, and to also provide a proposed height restricted easement plan. These plans will support the plan sealing process. Should the requested subdivision plans not be provided, the ROL component of the proposal should be removed.

Response: Please use this letters as our formal notice to Change the development application to remove the Reconfiguring of a lot permit. As this change is Minor in nature, it will not affect the development assessment process. We kindly ask Council to continue with the assessment removing the ROL component of the application.

2. Flooding

The proposed civil works plans require further information and amendments to be provided and subsequently, the Flood Report is to be updated to address the following items.

- a) The earthworks plans must clearly show the area of cut/fill, the volumes of cut/fill, dimensioned cross-sections and retaining wall heights etc, regardless of if the works are outside of the 2% AEP area.

Response: Please find an updated set of civil engineering plans attached as **Appendix A**, and an updated flood report attached as **Appendix B** that address issue 2(a).

- b) Update the proposed stormwater design with an internal drainage network which provides 150mm diameter connections to each unit, a foul-water line connection and connection of the driveway drainage, all directed to the lawful point of discharge, i.e., the road gully in Boys Street.

- i. Provide details for proposed ground surface stability treatments which will drain freely to on-site connections to the external stormwater networks.

Response: Please find an updated set of civil engineering plans attached as **Appendix A**, and an updated flood report attached as **Appendix B** that address issue 2(b).

- c) The architectural plans show multiple structural columns and/or walls (possibly firewalls) within the undercroft area. The presence of the 3 x 1500 stormwater barrels diagonally across the site also introduces another complexity into the building's structural design in the vicinity of units 5, 6 and 7 as the 7.0m wide easement will require deep beams to support these unit dwellings which could impact on the current minimum 8.7m AHD level.

The Flood Report modelling must be updated to include preliminary structural support designs of slabs / beams / columns and support walls – including firewalls (if they are

determined to be required by a Building Certifier) and an allowance for services slung beneath the floor slab. The Flood Report is to be amended to include:

- i. Updated flood modelling to include structural obstructions in the flowpath.
- ii. RPEQ Structural engineers' advice/concept structural plan with preliminary dimensions of structural obstructions within the flowpath, and this plan is to also be discussed within the flood report.
- iii. Advice from building certifier regarding requirements for fire-walls to ground level.
- iv. Amend the proposed architectural plans as required.

Response: Please find an updated set of civil engineering plans attached as **Appendix A**, and an updated flood report attached as **Appendix B** that address issue 2(c). Additionally, a structural engineering plan as been provided and is attached as **Appendix C**, along with advice from a Building certifier confirming the firewall arrangement attached as **Appendix D**.

3. Removal of eastern block wall

The existing eastern block wall has mitigated protection for the adjoining development for many years and its removal will create an adverse impact / actionable nuisance on the neighbouring dwelling. A similar height structural wall is required to mitigate flood impacts along the eastern boundary to the downstream neighbour's property as currently provided by the existing unregulated wall. The information provided in the current version of the Flood Report indicating that wall's removal will return the flow to natural state, which currently either passes through the holes in the wall or overtops in a major event is not accepted.

Response: The blockage representing the eastern block wall has been included in the existing and developed flood models. As a result, the updated documentation aligns with Council's request. Please see a more detailed response within **Appendix B**.

4. Crash barrier wall

The amended proposal now includes a 190mm wide crash barrier wall and a 5.7m parking aisle.

- i. The proposed 190mm wide block wall must be confirmed by a RPEQ (structural) engineers' certification as being of typical size for a crash barrier wall of this type that is structurally designed so that it will not shatter on impact. Provide RPEQ structural advice on the proposed width of this wall. This is required as the ultimate parking aisle width will impact on the already very tight proposed aisle width if the walls ultimately have to be larger than currently proposed.

Response: Please find a RPEQ signed structural plan attached as **Appendix C**.

5. Parking aisle deck width, swept paths and access to garages

The response provided has not addressed all of the issues raised. The traffic engineering response does demonstrate the parking aisle width is supported by the RPEQ. However this is not correct as the previous proposed parking aisle width was in line with AS2890.1 with a width of 5.8m.

The current drawing shows the apron width and parking aisle width has been reduced from 5.8m to 5.7m. This does not comply with the required standards for two-way aisles, i.e., ref: TAPS PSP Section 7.4.4 requires 6.2m width nor with AS2890.1.

The proposal also shows the proposed double garage door openings are 5.2m wide whereas the TAPS PSP requires a minimum 5.3m wide, ref: TAPS PSP section 7.8.3. The parking aisle turning templates are also to maintain a minimum 300mm clearance to the crash barrier wall.

- i. The RPEQ is to demonstrate, with swept path diagrams, that the design vehicle (B85) can manoeuvre into garage parking space with the other space full. The B99 worst case scenario is to also be demonstrated to ensure it is possible for a B99 vehicle to use the garage albeit with multiple turns.

Response: Please find an updated traffic engineering report attached as **Appendix E** that provides a RPEQ response to this item raised.

- ii. The traffic engineer's memo of 26 November 2024 (Modus) is to be updated to include:
 - updated architectural drawings;
 - supporting swept paths to demonstrate a minimum 5.8m parking aisle and 5.3m garage door opening;
 - a compliant parking aisle width to the AS2890.1 with a minimum 5.8m width;
 - RPEQ's written signature (not digital format) if all proposed performance solutions to the TAPS Code / PSP are to be considered for acceptance.

Response: Please find an updated traffic engineering report attached as **Appendix E** that provides a RPEQ response to this item raised.

6. Streetscape verge width

The requested changes for the external concrete pedestrian footpath and to survey the frontages to establish if there is a minimum verge width (to 3.75m) has been requested to be conditioned. This is not accepted; the verge width cannot be conditioned as it may impact the development layout.

- i. Provide a registered cadastral surveyor land survey plan showing the existing verge widths along both frontages to determine if the required minimum verge width of 3.75m exists, or if a land dedication is required to meet this requirement.

Response: From a review, it appears that both street frontage verge widths are 3.6m and do not achieve the 3.75m requested. Despite not strictly complying with AO1 of the Streetscape hierarchy overlay code, as per s3.7.3.2(5) of the Infrastructure design PSP, where the existing verge width is consistently narrower than the standard width for the length of the street block, a 2.5m width can be supported. As such, a verge width under 3.75m is envisaged where the verge is consistently narrower in the streets, which is the case for both Boys and Beck Streets.

Additionally, the 3.6m vs. 3.75m will have no impact on the ability for the development to comply with the intended outcome under PO1 as per the following:

PO1

Development must improve pedestrian movement and [amenity](#) by providing for verges to a width that is appropriate to accommodate large subtropical street tree planting and high levels of pedestrian movement.

- ii. The proposed drawings must also be amended to include details of the required Streetscape Hierarchy Overlay Code as a Neighbourhood Street – NS1, as per the Infrastructure Design PSP Table 3.7.4.4.1.A to provide 1.80m wide footpaths to both frontages, with links to the intersection pedestrian ramps.

Response: Please condition accordingly. Final design can be completed at the Operational works phase of the development. Please note, these have been provided on the civil and landscape intent plans.

7. Landscaping

- a) Proposed side boundary planting dimensions are too narrow and too removed from the elevated deck to achieve the intended landscaping outcomes.
Landscaping in the proposed location will also not be accessible for viable maintenance.

- i. Remove the proposed 500mm wide garden bed along the side boundary.

Response: Please find an updated landscape intent plan attached as **Appendix F**. The landscape architect has kept the 500mm gardens in place, but please condition accordingly for them to be removed, where required.

- b) Increased setbacks and garden bed widths to achieve a better landscape interface along the Boys St frontage has not been achieved. The 1m wide garden bed widths provided are insufficient to provide required soil volumes to establish tree planting as proposed in the Landscape concept plan. Trees will need to be planted with a min 1m offset from structures to avoid future conflict, and the current proposal would result in the trees encroaching into the verge as the trees mature.

Trees proposed along Boys St are required to reduce the bulk and scale, provide privacy between public realm and private open space or dwellings. Tree canopies along Boys St indicated on plans appear to measure 3m in diameter, which is smaller than most 'small canopy trees', and smaller than the proposed tree species at maturity. The proposed trees in 1m wide garden beds, placed 500mm from the built form, would need regular pruning to avoid conflict with the built form, resulting in lopsided and unsustainable tree canopies.

The narrow garden beds further do not meet the requirement for better screening of the undercroft.

- i. Amend proposed plans to achieve tree planting in min 2m wide garden beds along the Boys St frontage to allow for the establishment of shade canopy trees to reduce bulk and scale, improve visual amenity and separation from public realm areas, and to comply with AO28.1 of the Multiple dwelling code.

Response: Please find an updated landscape intent plan attached as **Appendix F**. The landscape architect has included trees and plans that achieve the desired outcomes requested under this item.

- c) Finished levels (FLs) to deep planting and other landscaped areas have not been provided in the revised Landscape concept plan as advised, and are required to demonstrate that the proposal will achieve viable landscaping outcomes to meet relevant code requirements. Architectural and Landscape plans and sections/elevations do not clearly indicate whether some landscaping areas are raised (as some appear to be), making the assessment of potential impacts and conflicts inconclusive. Potential conflicts within the overland flow path, and the difference in levels between landscapes and buildings is required to ensure the proposal is safe and effective; also, show how maintenance access to all landscape areas will be achieved.

The Storm Water Consulting Report Figure 2.3 indicates deep planting and site frontage landscaping 'at existing levels', and a raised and solid slab where landscaping is proposed near visitor car parking and bins storage.

It is further noted that the number of steps from Boys St to Unit entries is equal to all units, however, FLs at the verge interface varies considerably between Unit 1 and Unit 7.

- i. Indicate proposed finished levels of all landscaped areas for assessment, including within the verge (ie, back of kerb and at proposed entry gates).

Response: Please find an updated set of architectural plans attached as **Appendix G**.

- ii. Check and revise steps at Unit entries where required to meet proposed FLs at entry gates.

Response: Please find an updated set of architectural plans attached as **Appendix G**.

- d) Containerised planting details to demonstrate quality outcomes of planting in raised planters has still not been provided as requested.

- i. Provide details of planter depths for proposed containerised planting including internal soil and mulch depths, drainage media, irrigation, and connection to stormwater in accordance with Sections 3, 5 and 6 of the Landscape design planning scheme policy.

Response: Please review the Landscape intent plan that includes this information attached as **Appendix F**.

- e) Concerns raised and information requested regarding CPTED and landscape maintenance have not been addressed.

- i. Provide details of safe and convenient access for residents and for maintenance purposes to deep planting in common ownership areas between buildings in accordance with PO23 of the Multiple dwelling code and Section 10 of the Landscape design planning scheme policy.

Response: Please find an updated set of architectural plans attached as **Appendix G** and Landscape intent plan attached as **Appendix F**.

- f) Page 1 of the Storm Water Consulting (SWC) Report states that undercroft areas would be

inaccessible to people as these areas are fenced off and would include deep planting.

Page 4 of the SWC Report also advises that planting at the Boys St frontage will be at natural ground level, and would therefore not contribute to any blockage of the overland flow path.

It has not been demonstrated that proposed landscaping located within the overland flow path can withstand the expected stormwater impacts.

- i. Provide details of any existing or proposed underground services and retaining walls within deep planting areas to demonstrate compliance with AO29.4.

Response: Please review the Landscape intent plan that includes this information attached as **Appendix F**.

- ii. Demonstrate that landscaping (including soil, mulch, and planting) proposed within the overland flow path will not be eroded or otherwise damaged by proposed water velocities and depths.

Response: Please review the Landscape intent plan that includes this information attached as **Appendix F**.

- g) The proposed Bin collection area on Boys St appears to encroach into the standard footpath alignment, and existing finished levels (FLs) may not be appropriate for bin collection.

- i. As requested above, provide FLs at back of kerb and entry gates to allow assessment of the proposed bin collection area within the streetscape.

Response: Please find an updated set of architectural plans attached as **Appendix G** that show the bin collection area to be in the flatter part of the verge.

- ii. Demonstrate compliance with relevant sections of Chapter 3.7 of the Infrastructure design planning scheme policy to ensure safe pedestrian movement along the streetscape fronting Boys St, including a 1:50 crossfall across the verge, and indicating adequate clearance between the new 1.2m wide footpath and bin collection area.

Response: Please condition accordingly.

Should Council have any outstanding issues associated with the information provided within this report, we formally request that Council informs us prior to making a decision.

Kind regards,



Alexander Steffan | Director
Steffan Harries



Multiple Dwelling (3 storey)
109 Beck Street, Paddington QLD 4060
Lot 1008 on SL5674

Email: alex@steffanharries.au