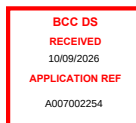


8 September 2026

Brisbane City Council
GPO Box 1434
Brisbane QLD 4001



Attention: **Dominic Hudson**

Dear Dominic,

RE: Response to Information Request - A007002254 – 97 Denham Street, Bracken Ridge

Doyen Town Planning acts on behalf of the landowner for the above development application.

We refer to Council's Information Request dated 15 June 2026 and provide the Applicant's full response, together with the amended proposal plans and supporting specialist documentation.

Since receiving the Information Request, the project team has reviewed the matters raised and coordinated amendments to the architectural, landscape, traffic, civil and acoustic documentation. The proposal retains its 147-place capacity and operating hours of 6.00 am to 7.00 pm.

The principal amendments and supporting work include:

- an enlarged, dedicated deep-planting area near the Denham Street frontage and revised landscape planting;
- revised parking and refuse-storage arrangements, including an enlarged, roofed and fully screened bin enclosure;
- updated assessment of servicing under the interim and ultimate access arrangements;
- revised frontage works, stormwater detention and provision for upstream drainage;
- additional acoustic fencing and an expanded acoustic assessment; and
- documentation of existing vegetation retention and removal through the S5 assessment and management schedule.

The accompanying response addresses each matter raised by Council and explains the relationship between the revised proposal and the relevant assessment benchmarks. Where the proposal adopts an alternative to the particular design or assessment approach requested, the corresponding planning or technical justification is provided.

A summary table has been included to identify the principal responses and direct Council to the relevant supporting material.

The following documents accompany this submission:

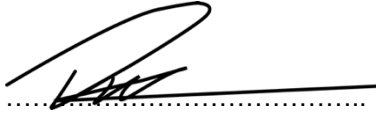
- **Attachment A:** Architectural Plans
- **Attachment B:** Childcare Needs Assessment – August 2026
- **Attachment C:** Needs Assessment Response Letter – 25 June 2026
- **Attachment D:** Preliminary Ecological Assessment – 26 August 2026
- **Attachment E:** Vegetation Retention Plan and Management Schedule – 20 August 2026
- **Attachment F:** Landscape Concept Plans – 11 August 2026



- **Attachment G:** Engineering Information Request Response – 28 August 2026
- **Attachment H:** Stormwater Management Plan – 27 August 2026
- **Attachment I:** MUSIC Model
- **Attachment J:** Transport Impact Assessment – 7 September 2026
- **Attachment K:** Noise Impact Assessment Report – 4 September 2026

Should you have any questions in relation to the response, please contact our office on (07) 3180 4702.

Yours Sincerely,



Rhys Trombetta

Director
Doyen Planning



Response to Information Request

97 Denham Street, Bracken Ridge

Introduction

This response addresses Council's Information Request dated 15 June 2026 for development application A007002254.

The amended proposal plans and specialist documentation should be read with the original application material, except where that material is superseded by this submission.

The response maintains the planning approach established in the original application. The proposal is assessed having regard to the site's configuration, surrounding land uses, operational requirements and intended future infrastructure arrangements. Where a prescriptive acceptable outcome is not achieved, the relevant performance outcome and supporting site-specific considerations are addressed.

Council's Information Request repeats item numbers 6, 7 and 8 under its final three headings. Those matters are identified below by their subject headings to distinguish them from the earlier refuse and servicing items.

Summary of Responses

Council item	Principal response and planning position	Supporting material
1 – Needs assessment	The updated assessment corrects the relevant long day care supply figure and provides revised participation scenarios supporting the assessment of need.	Attachment B
2 – Significant vegetation	S5 documents the assessed vegetation, proposed retention/removal outcome and management requirements. This material is relied upon in place of a separate arborist report.	Attachment C
3 – Deep planting	The revised layout provides an enlarged frontage planting area with dimensions exceeding 4m in both directions and substantial canopy species. A performance-based assessment addresses the remaining departures.	Attachments A and D; assessment below
4 – Landscaping and amenity	The landscape scheme combines canopy, screen and lower planting to address streetscape and adjoining amenity. The response explains the alternative to a continuous 2m frontage bed and uniform two-tier planting.	Attachment D, particularly Sheets 2, 3 and 5
5 – Footpath	HCE's revised alignment addresses the frontage requirements, with a localised transition near the crossover responding to the available grades.	Attachment E – engineering response and Concept Services Plan
6–7 – Bin storage	The enlarged side-access bin store provides individual bin access and is roofed and screened from floor to roof.	Attachments A and F, Section 7



8–9 – Servicing	Updated swept paths demonstrate Council-standard RCV servicing under the interim arrangement and private waste collection under the ultimate arrangement.	Attachment F, Section 7 and Figures 7.1–7.2
10 – Stormwater quantity	A 200m ³ detention system achieves a modelled 10% AEP detention outflow of 66 L/s, below Council's 90 L/s limit. HCE provides a site-specific major-flow strategy.	Attachment E, Section 3.6 and engineering response
11 – Upstream drainage	A dedicated 300mm upstream connection bypasses detention and is accommodated within a 1.5m drainage easement.	Attachment E – Concept Services Plan
Noise	The updated report assesses full child capacity and the proposed operating hours, adds acoustic treatment and provides a detailed response in Appendix D, including justification of receiver selection.	Attachment G, particularly Appendix D, Section 4 and Table 14
Stormwater quality	The documented treatment system and MUSIC model predict achievement of all four nominated pollutant-reduction targets.	Attachment E, Section 4.3.3 and accompanying model
Proposal plans	Revised sections and elevations identify natural ground level.	Attachment A

Item 1 –**Needs Assessment**

The Childcare Needs Assessment for 97 Denham Street Bracken Ridge prepared by Business Geographics and dated September 2025 has been reviewed by Council and is not considered to provide an adequate assessment of need to support the proposed development.

- a) *A review of ACECQA registers indicates that the Little Local Bracken Ridge childcare centre at the intersection of Norris and Barbour Roads is approved for 201 places, while the need assessment report indicates approved places at 146 places. Provide an updated assessment to reflect the approved places reported by ACECQA or a comprehensive explanation as to why a different number of places should be adopted; and*
- b) *Council notes that the average long day care participation rate across Queensland is currently approximately 55%. While it is accepted demographic factors might result in higher participation rates within metropolitan areas, it is considered unlikely that a 70% long day care participation rate is plausible within the context of Bracken Ridge. Provide an updated analysis reflecting more plausible long day care participation rate assumptions or alternatively, provide a comprehensive analysis as to why a participation rate of 70% is plausible*

Item 1 Response

Business Geographics has provided an updated Childcare Needs Assessment and supporting response letter addressing the matters raised by Council. The August 2026 assessment provides the updated supply and demand analysis relied upon for this application.

Little Locals Bracken Ridge

Business Geographics confirms that the service's 201 approved places comprise 156 long day care places and 45 outside school hours care places.



The updated assessment therefore adopts 156 long day care places, correcting the previously adopted figure of 146. The 45 outside school hours care places are distinguished from the long day care component because they serve a different childcare market.

The revised figure consequently reflects the relevant competing long day care supply while accounting for the total approved capacity identified by Council.

Participation assumptions

The updated assessment adopts a 65% participation rate for current demand and considers two scenarios for 2031:

- a lower-growth scenario maintaining participation at 65%; and
- a higher-growth scenario adopting participation of 70%.

The assessment therefore no longer depends on 70% participation as its current or sole demand assumption.

Business Geographics explains the local participation assumptions by reference to the catchment's demographic characteristics, including relatively high female labour-force participation, its metropolitan context and the availability of alternative early childhood education options. The report also addresses attendance frequency and demand currently serviced outside the catchment.

Importantly, the assessment considers both existing services and the identified development pipeline, including the approved 125-place centre at 173 Norris Road. It identifies potential for approximately 220–280 additional places by 2031, depending on the demand scenario and occupancy assumptions adopted.

The specialist assessment supports the proposed 147-place centre within that forward-looking supply and demand context. It is not dependent on an immediate existing shortfall of 147 places.

Accordingly, the updated material resolves the identified supply discrepancy, explains the revised participation assumptions and provides an appropriate basis for assessing the proposal's contribution to local childcare need.

Item 2 –

Significant vegetation – Tree Retention Plan and Arborist Report

It is evident from Council's mapping and aerial photography that 'significant vegetation' may be present on site. Council seeks the retention of significant vegetation, and to allow for the environmental, character and amenity values including visual amenity, microclimate, natural shade and habitat to be retained and maintained. Further information is required on the existing vegetation on the development site with the following:

- Undertake a tree assessment of existing trees on site and provide a survey of existing vegetation via a Tree Retention Plan (TRP). The TRP is to be supported by an Arborist Report of which has been prepared by a qualified AQF Level 5 Arborist (Diploma in Arboriculture) as per the Infrastructure design planning scheme policy s1.7 and AS4970 (2025) Protection of Trees on Development Sites. The TRP and Arborist Report must clearly show the surveyed location of all vegetation with DBH of 150mm of greater and must include*
 - *Surveyed locations of existing trees.*
 - *Botanical species name.*
 - *Height (m).*
 - *Crown diameter (m).*
 - *A general tree health assessment.*
 - *Diameter at standard height (DSH), measured as the trunk diameter at 1.4 m above ground level.*
 - *Tree protection zones/SRZ/NRZ must be provided on the drawings/report with reference to Australian Standards - AS4970 - 2025 Protection of Trees on Development Sites.*



- *Arborist is to specify the minor and major encroachments.*
- *The proposed development layout, including any preliminary earthworks plan for the proposed development, driveway/s and ancillary structures, indication of the existing and proposed levels in relation to the surveyed tree and proposed impacts.*
- *Location of proposed services.*
- *Arborist statement on the proposed impacts to the existing tree and proposed methodologies for its long-term retention/protection.*

Item 2 Response

The Applicant provides S5's updated Preliminary Ecological Assessment and Vegetation Retention Plan and Management Schedule.

The Vegetation Retention Plan maps the assessed trees and provides a corresponding schedule identifying species, trunk dimensions, height, crown spread, general health, relevant ecological observations, tree protection zones and the proposed retention or removal outcome.

Across the assessed area, including relevant adjoining vegetation, the schedule identifies 80 trees, comprising 10 trees for retention and 70 for removal. The retained trees are numbered 2, 3, 4, 5, 6, 8, 9, 10, 13 and 75. Tree 6 remains subject to the further inspection identified in the schedule.

The assessment area includes adjoining vegetation relevant to the development's interfaces. The tree totals should therefore be read with the mapped locations rather than treated as a count of trees wholly within the subject site.

S5 describes a substantially modified, non-remnant environment and assesses the ecological implications of the proposed clearing. The assessment does not identify a threatened ecological community and concludes that significant impacts on the assessed threatened ecological values are unlikely, subject to its recommendations.

The existing vegetation nevertheless makes habitat and amenity contributions, which are recorded in the S5 material. The retention/removal schedule allows those values and the proposed development impacts to be considered on a tree-specific basis.

Planning assessment

The vegetation response is based on the S5 assessment and the proposed replacement landscape scheme. Together, these documents establish the vegetation present, identify the intended retention/removal outcome and explain the ecological implications of that outcome.

The S5 material provides an ecological and vegetation-management assessment rather than a separate AQF Level 5 arboricultural assessment addressing all requested root-zone and development-encroachment matters. The Applicant seeks acceptance of that alternative evidence for the purposes of this application.

Retained trees will be subject to the protection measures and qualifications identified in the S5 documentation, including the specific qualification applying to Tree 6.

Written neighbour consent has been obtained for the removal of Trees 36, 37, 38 and 73 at 103 Denham Street and Tree 41 at 8 Childs Street. Copies of the signed consents are included in Appendix D of S5's Preliminary Ecological Assessment.

Any vegetation clearing permits required as identified by S5 will be obtained before the relevant clearing works occur.

On that basis, the S5 documentation is considered to provide an appropriate basis for assessing the proposed vegetation retention and removal outcome, with the identified protection and management measures carried through to implementation.

Item 3 –

Deep Planting

The proposed deep planting areas are not considered adequate to support large subtropical shade tree planting/s that will assist in the balance and reducing the bulk and scale of the proposed childcare centre as viewed from the site boundaries. Further amendments to the deep planting configurations are required.

- a) *Provide amended plans in accordance with Childcare Centre code PO2, PO4, PO5, and Landscape Works code that show:*
 - i) *Revised/reduced development footprint that allows for the incorporation of dedicated deep planting zones with large trees that can achieve a minimum height of 6m that is complementary to the proposed building's height and form. A minimum dimension of 4.0m in any direction for deep planting, is the acceptable standard required to cater for large subtropical shade trees.*
 - ii) *It should be noted that the deep planting zones are not to form part of any outdoor play area. Any reduction of deep planting areas with the nominated/selected tree species, is to be confirmed by the qualified arborist.*
 - iii) *All deep planting areas are to be fully mulched.*
 - iv) *Incorporate deep planting zones in areas where existing onsite trees are to be retained*

Item 3 Response

The site layout has been amended to enlarge the dedicated planting area near the Denham Street frontage, north of the vehicle crossover.

AGLA's revised Landscape Concept Plans identify this area as 24.3m², with dimensions of approximately 5.5m by 4.5m. The revised configuration therefore provides dimensions exceeding 4m in both directions and creates a more substantial planting opportunity at the principal public interface.

The area is separate from the outdoor play areas and will be fully mulched. It will remain open to the sky and established in natural ground, without underground development compromising its deep-planting function.

The landscape schedule includes canopy species such as *Cupaniopsis anacardioides* and *Tristania laurina*, with nominated mature heights of approximately 15 m and 10 m respectively. These exceed the minimum 6 m tree-height objective identified in Council's request and provide a substantial landscape scale relative to the proposed building.

The dedicated deep-planting area is considered separately from the outdoor play areas, podium planting, narrow landscape strips and future access areas.

Assessment against the Childcare centre code

The revised deep-planting arrangement strengthens the landscape contribution of the development. Where departures from the prescribed acceptable outcomes arise, the assessment below sets out the basis for demonstrating compliance with the corresponding performance outcomes, having regard to the proposed canopy planting, site configuration and overall landscape response.



Benchmark	Assessment
PO2 – Protection of nearby sensitive-use amenity	The enlarged frontage planting area introduces canopy planting beside the principal arrival and parking area. Together with the broader landscape scheme and acoustic treatments, it softens the development's presentation and assists in managing the interfaces with surrounding uses.
PO4(a) – Access to light and rainfall	The dedicated planting area is open to the sky and is not occupied by a building or roofed structure.
PO4(b) – Planting in natural ground	The area is provided for natural-ground planting and will remain free of underground development that would prevent it functioning as deep planting.
PO4(c) – Large subtropical trees complementary to the building	The nominated canopy species provide mature heights of approximately 10–15 m, contributing substantial canopy and vertical landscape relief.
PO4(d) – Balance to hardstand, shade and accessible outdoor amenity	The enlarged area provides dedicated planting beside the entrance and parking area, contributing shade and visual relief to those spaces. The mulched planting bed is not itself occupiable recreation space; outdoor recreation is provided separately within the childcare facilities.
PO5 – Positioning to maximise existing site features	The frontage provides the principal opportunity for an enlarged natural-ground planting area. Peripheral vegetation retention is separately identified by S5. The new frontage area does not surround the retained trees or establish a contiguous deep-planting area with adjoining properties.

The revised layout provides a dedicated natural-ground planting area at the Denham Street frontage, with dimensions that allow a more substantial canopy contribution beside the parking and arrival area. Its position enables the proposed trees to soften the development's public presentation, provide shade and balance the adjoining hardstand. The broader landscape scheme complements this area through planting at the site boundaries and around the outdoor environments.

The location of permanent deep planting has been considered alongside the site's elongated configuration, drainage infrastructure and intended future road and access arrangements. These considerations influence where planting can be established and retained over the life of the development. The revised design responds by securing an enlarged frontage planting area while maintaining the circulation, servicing and outdoor space required for the centre to function safely.

A performance-based assessment is provided for the departures from AO4.1–AO4.3 and AO5.1–AO5.2. These relate to the provision of less than 10% of the site as deep planting, the prescribed planting-stock and five-year growth criteria not demonstrated by the landscape schedule, and the positioning of deep planting around retained trees and adjoining planting areas. The corresponding performance outcomes are addressed through the actual dimensions, location, species selection and landscape functions of the revised proposal.

The assessment draws on S5's documentation for existing vegetation retention and AGLA's plans for proposed planting. These establish the respective retention and replacement planting strategies supporting the site-specific response. The nominated canopy species provide substantial mature height, while the frontage location concentrates their contribution where they can directly improve streetscape presentation and the amenity of the arrival environment.

Having regard to these characteristics, the revised arrangement is considered to provide an appropriate performance-based landscape response. The enlarged natural-ground planting area, proposed canopy scale and complementary landscape treatment provide a planning basis for supporting the identified departures through assessment against PO4 and PO5.

Item 4 –

Landscaping and Onsite Amenity

The provision for subtropical landscape elements for the proposal is limited and should be improved in accordance with the PO2, PO6 of the Childcare Centre code, PO19 of the Community facilities code and the Landscape Works code requirements with the following:

- a) *Provide a two-metre-wide landscape bed along the site's Denham Street frontage (after road widening) planted with shade trees, shrubs and groundcovers, to integrate the development, to facilitate natural shade and amenity and provide screening of the proposed carpark area from the street.*
- b) *Provide additional landscape measures that are located outside of the proposed outdoor play areas throughout the development site including the site boundaries. Incorporate a minimum of two tiers of planting for all additional landscape areas to contribute to subtropical character, onsite amenity, microclimate and to assist in the screening of adjacent sensitive uses.*
- c) *Provide a revised Landscape Concept Plan addressing items 2 - 4 above.*

Item 4 Response

AGLA's revised Landscape Concept Plans provide canopy trees, columnar trees, screen planting, shrubs and groundcovers across the site.

The scheme includes planting outside the outdoor play areas, including the enlarged frontage area and planting along the site's interfaces. The nominated tree palette includes mature heights of approximately 8–15m, with screen shrubs providing an intermediate layer in the locations shown.

The resulting landscape response is directed to the areas where planting can make a practical contribution to streetscape presentation, adjoining amenity and the outdoor environment of the centre.

The plans do not provide a continuous 2 m wide landscape bed along the entire post-widening Denham Street frontage, and two-tier planting is not provided in every landscape strip. The proposal therefore requires consideration against the relevant performance outcomes.

Childcare centre code – PO2 and PO6

The revised planting contributes to the amenity and subtropical landscape outcomes sought by these provisions through:

- canopy and vertical planting that soften the building form;
- shade and climatic relief around the frontage and outdoor environments;
- screen planting that assists privacy and boundary presentation; and
- a coordinated subtropical species palette.

The assessment is based on the functions and mature scale of the scheduled planting. It does not depend on the illustrative architectural tree symbols or a separately verified calculation of the proportion of trees exceeding the building's eaves.



Community facilities code – PO19

PO19 seeks to ensure that parking does not dominate the frontage and that street and adjoining-property amenity are maintained. The associated acceptable outcome contemplates integration with high-quality landscaping where parking is forward of the building line.

The revised frontage arrangement places canopy planting and the enlarged planting area alongside the parking and arrival functions. This provides landscape relief at the principal public interface and breaks up the presentation of hardstand.

The landscape response is consequently integrated with the parking layout, rather than confined to planting remote from the frontage. Although it does not provide a uniform frontage buffer, the combination of canopy, screen and lower planting is considered to provide a meaningful contribution to the streetscape.

Landscape work code

The proposed planting responds to the screening, street presentation, shading and amenity functions identified in PO3 and PO7.

AO2.2 and AO3 identify two-tier planting as an acceptable approach where planting buffers are required. Where that arrangement is not provided, the proposal relies on the combined effect of:

- layered planting in the locations documented by AGLA;
- canopy and columnar planting providing landscape height and visual relief; and
- the specified acoustic and visual barriers at sensitive interfaces.

Lower planting in the narrower areas provides a complementary landscape contribution. It is not treated as equivalent to a fully layered planting buffer.

The approved landscape scheme will be implemented and maintained, including provision of appropriate growing conditions, replacement of failed planting and protection from vehicle encroachment. The concept plans establish the proposed species and locations, rather than a quantified demonstration of every planting-establishment or five-year shade target.

Taken together, the proposed canopy, screening and boundary treatments provide a coordinated landscape response to the site's configuration and operational requirements. The arrangement is considered appropriate on its streetscape and amenity merits, notwithstanding the departures from a continuous frontage bed and uniform two-tier planting.

Item 5 –

Denham Street Not to Prejudice - RC16210 - Issue 1.

Footpath realignment on Denham St frontage partly places the footpath within the private property “not to prejudice” road widening area. Public asset within private property is not supported.

- a) The proposed new transition of the footpath on Denham Street frontage as being depicted on the Landscape Concept Plan and architectural drawings is to be removed from the “not to prejudice widening” area. Any new concrete path (including partial reinstatement) should also be on a straight alignment outside the ‘not to prejudice’ widening area.*

Item 5 Response

HCE has revised the footpath alignment, as shown on its Concept Services Plan and explained in the Engineering Information Request Response.

The revised path is generally located outside the “not to prejudice” area and connects with the existing footpath network. A small encroachment remains near the crossover where the path transitions to the driveway grade.

HCE explains that the first approximately 1.45m of this transition requires a ramp. Moving the path closer to the kerb at that location would require a steeper ramp to accommodate the required 2% footpath crossfall.

The localised encroachment therefore responds to the available levels at the crossover. The revised design otherwise achieves the intended frontage alignment while maintaining continuity with the existing pedestrian network.

Having regard to HCE’s grade assessment and the limited extent of the transition, the revised alignment is considered an appropriate site-specific response to Council’s concern.

Item 6 –

Refuse and Servicing

It is noted the proposed ‘Bin Store’ has a dimension of 7.2m x 2m, however it does not allow individual bins to be removed for servicing. In accordance with PO8/AO8.1, AO8.2 of the Infrastructure design code, demonstrate on amended plans either of the following.

- a) *Decrease the size of the ‘Bin Store’ to a minimum 7.2m x 1.6m (11.52m²). Include multiple doors on the southern side of the bin store, so each bin can be accessed from the front, while ensuring there is sufficient space between the bin store and the carparking bays for transfer of bins to the Refuse Collection Vehicle (RCV). Include the dimensions of the bin store on amended plans.*
- OR
- b) *Keep the door on the side by Increasing the size of the ‘Bin Store’ to 7.2m x 2.23m (16.56m²), so that each bin can be accessed and removed for servicing without requiring all bins to be removed to access the bin at the rear. Include the dimensions of the bin store on amended plans.*

Item 6 Response

The amended proposal adopts Council’s enlarged side-access option.

The bin store is approximately 7.3m by 2.23m internally, exceeding the minimum 7.2m length and meeting the 2.23m width identified in Council’s request.

The arrangement allows individual bins to be accessed and removed without requiring the entire group to be moved to reach a bin at the rear. The dimensions and access arrangement are identified on the amended architectural plans and confirmed in Section 7 of Rytskild’s updated Transport Impact Assessment.

The revised enclosure directly addresses the functional access concern raised under PO8 and AO8.1–AO8.2 of the Infrastructure design code.

Item 7 –

The West Elevation on the Elevations – Sheet 01 (Drawing Number DA-09.01), shows the ‘Bin Store’ is not wholly screened. Provide updated architectural plans demonstrating the entire bin store is roofed and wholly screened (i.e. screening must go from floor to roof on all sides).

Item 7 Response

The amended architectural plans provide a roofed bin enclosure with screening from floor to roof, including the access doors.

The revised treatment screens the stored bins from the street and adjoining areas and addresses the exposed portion identified by Council. The roofed and fully screened arrangement is also confirmed in Section 7 of the updated Transport Impact Assessment.

This item has been addressed through the amended enclosure design.

Item 8 –

Refuse Collection Vehicle Swept Paths

In accordance with PO1/AO1, PO18/AO18 and PO19/AO19.2, AO19.3 of the Transport, access, parking and servicing code, provide an updated RPEQ certified swept path analysis for the RCV manoeuvre utilising a kerb to kerb turning radius of 9.757m as per BSD 3008 sheet 2 of 2. Alternatively, provide clarification from a RPEQ that the proposed steering angle of 51.4 is equivalent to a kerb to kerb turning radius of 9.757m.

Item 8 Response

Rytenskild's updated Transport Impact Assessment has been reviewed and RPEQ certified. Section 7 and Figures 7.1–7.2 assess servicing under the interim and ultimate access arrangements.

Arrangement	Servicing assessment
Interim access from Denham Street	Figure 7.1 demonstrates a rear-loading RCV using Council's specified 9.757m kerb-to-kerb turning radius. The vehicle can enter, stand wholly within the site for collection, manoeuvre and depart in a forward direction.
Ultimate access through the southern easement driveway	Figure 7.2 assesses an 8m private refuse collection vehicle. The former Denham Street driveway area becomes part of the internal turning arrangement, with servicing undertaken by a private waste contractor.

The interim arrangement directly adopts the Council RCV turning radius requested in the Information Request.

The ultimate arrangement is a separate private collection solution, using the vehicle assessed in Figure 7.2. Private waste collection with a vehicle compatible with that swept path will be required when the ultimate access arrangement is implemented.

The servicing strategy therefore responds to both stages of the development. It provides workable collection arrangements under the interim layout while preserving a suitable servicing outcome when access transfers to the southern easement driveway.

On that basis, the updated assessment supports the proposed servicing arrangements under PO1, PO18 and PO19 of the Transport, access, parking and servicing code.

Green waste

Green waste will be removed by the landscape maintenance contractor. A separate Council green-waste collection service is not proposed.

Item 9 –
Onsite Servicing

Transport, access, parking and servicing (TAPS) requirement is for a RCV and VAN vehicles to service the site. A traffic report has been provided with swept paths to demonstrate a RCV manoeuvring. Servicing is acceptable however, revised RPEQ certified RCV swept paths with kerb to kerb turning radius of 9.757m as per BSD 3008 sheet 2 of 2 are to be submitted to demonstrate compliance with PO18 and PO19.

Item 9 Response

Council's advice that servicing is otherwise acceptable is noted.

The revised RCV swept paths are provided in Section 7 and Figures 7.1–7.2 of the updated Transport Impact Assessment, as addressed under Item 8.

The assessment demonstrates the Council-standard RCV manoeuvre under the interim arrangement and a private collection vehicle manoeuvre under the ultimate arrangement. In each case, the assessed vehicle is accommodated within the site, with internal manoeuvring and forward departure.

The revised analysis consequently addresses the outstanding servicing manoeuvre requirement and supports the proposed arrangements under PO18 and PO19.

Item 10 –
Stormwater Discharge and Major Flows

Proposal is to discharge to existing 375dia SW pipe south on the southern boundary of the site. The downslope Lawful point of discharge (LPD) is designed only for a 2Y ARI flow of 177l/s and this flow is assumed to come from both the development and the upslope land at 103 Denham Street, so only 88l/s is permissible from this development in the minor storm.

- a) *Provide a revised design including detention to limit 10% AEP flows to no more than 90L/s in accordance with PO3 of the Stormwater code.*
- i) *Design is also to demonstrate that major flow can freely drain to Denham Street via the crossover not onto neighbouring properties.*

Item 10 Response

HCE has revised the Stormwater Management Plan to incorporate a 200m³ on-site detention system and has provided further explanation of the major-flow arrangements in its Engineering Information Request Response.

Detention and permissible discharge

Section 3.6 and Table 10 of the revised Stormwater Management Plan report the following detention-system outflows:

Design event	Modelled detention outflow
10% AEP	66 L/s
5% AEP	73 L/s
2% AEP	80 L/s
1% AEP	85 L/s

The modelled 10% AEP detention outflow of 66 L/s is below Council's nominated maximum of 90 L/s.

These figures relate to the detention system. External upstream bypass flows and the separate major overland-flow components are addressed through the broader drainage strategy.

The upstream connection bypasses detention and conveys the external catchment runoff separately to the lawful point of discharge.

Major-flow arrangements

The revised car park levels allow major exceedance flows within the car park to discharge toward Denham Street through the crossover.

The lower southern portion of the site requires a different response. HCE explains that existing ground levels in that area are substantially below Denham Street. Redirecting all major flows to the street would require significant filling and retaining works, which HCE considers impractical in the site's topographic context.

The proposed strategy therefore directs the relevant car park exceedance flows to Denham Street while maintaining the existing southern overland-flow regime. HCE advises that this preserves the existing drainage patterns without increasing impacts on neighbouring properties.

HCE also identifies the potential for flows associated with the ultimate eastern access arrangement to be captured through a pit-and-pipe system.

The engineering response consequently addresses the site as a whole, recognising that a single major-flow direction is not practical across the existing landform. The proposal does not redirect all major flows through the Denham Street crossover; it adopts a differentiated drainage strategy supported by HCE's assessment.

Having regard to the restricted detention discharge, separate upstream bypass and treatment of the existing overland-flow conditions, the revised stormwater arrangement is considered an appropriate response under PO3 of the Stormwater code.

Item 11 –

Upstream Stormwater Connection

Design proposes a concrete swale channel with under drainage to manage upstream catchment. Proposal does not adequately manage upstream catchment in accordance with PO11 of the Stormwater code.

- a) *provide a stub (e.g. not the channel itself) to upslope site at 103 Denham Street, with a minimum 90L/s capacity and being a min 225uPVC. This pipe shall bypass any detention where provided. A 1.5m wide easement over the upslope stormwater connection through the site is required to be shown on plan.*

Item 11 Response

HCE's revised Concept Services Plan provides a 300mm diameter upstream stormwater connection serving the upslope catchment at 103 Denham Street.

The connection:

- exceeds Council's minimum requested pipe diameter;
- is designed to provide the requested upstream drainage capacity;
- is contained within a 1.5 m wide stormwater easement through the site; and

- bypasses detention, conveying upstream runoff directly to the lawful point of discharge.

The pipe connection is provided in addition to the surface drainage measures along the northern interface. The concrete swale is therefore not relied upon as the future upstream connection.

HCE confirms that the arrangement addresses PO11 of the Stormwater code by accommodating the external catchment without using the development's detention storage to detain upstream flows.

The revised design directly addresses the connection, bypass and easement requirements raised by Council.

Item 6 –

Noise – Childcare Centre

Council's second Item 6

The proposal is for a 147-place Child Care Centre within an Emerging Community zone adjoining sensitive uses and sensitive zones. The proposed hours of operation (6:00am–7:00pm) do not comply with acceptable outcomes under the Childcare Centre Code and Community Facilities Code.

The submitted Noise Assessment Report (Noise Measurement Services, dated 17 April 2026) has been reviewed, and further clarification/information is still required to further adequately demonstrate compliance with the relevant performance outcomes in the above codes and the Noise Impact Assessment Planning Scheme Policy.

a) *Provide a revised Noise Assessment Report addressing the following:*

i) *Child numbers and worst-case scenario*

- *Clearly confirm the number of children modelled and correct errors in Table 7 (e.g. duplicate ages 0–2).*
Note: Table 7 presents reduced numbers (71 total: 22 outdoor, 49 indoor), while other figures (e.g. Plate 10) suggest grouped sources may have modelled the full 147 children.
- *Include a summary table of modelled scenarios and results that clearly sets out total children and how groupings represent overall occupancy and demonstrate a reasonable worst-case scenario for the full 147-child outdoor capacity has been modelled.*
- *Clearly present:*
 - *total children assessed*
 - *indoor/outdoor distribution*
 - *whether simultaneous full-capacity outdoor play (147 children) is assessed*
- *Report currently assumes indoor noise breakout along northern facades only. Where there are openings along the southern façade, include appropriate indoor noise assessment accordingly.*
- *Update results (e.g. Table 11) to clearly state underlying assumptions, including:*
 - *full-capacity outdoor play*
 - *duration of outdoor activity (e.g. 3 hours)*
 - *inclusion of mitigation (e.g. whether acoustic barriers are included for the result)*

ii) *Hours and operational assumptions*

- *The report appears to rely on not permitting outdoor play before 7:00am to achieve compliance with the night-time period (6:00am–7:00am). This is to be clearly included in the report assumptions and recommendations*
- *Alternatively, provide an addendum assessment demonstrating noise compliance for the full proposed hours (6:00am–7:00pm), including the 6:00am–7:00am period.*

iii) *Sensitive receivers and heights*

- Provide modelling at representative worst-case receiver locations and heights, including at a minimum, both ground level and upper levels (currently according to Table1, it appears R1-R2 at 4.6m only and R3-R5 at 1.5m only).
 - Include additional receivers at sensitive zone/receivers at 74 Denham St & 16 Child Street.
 - Justify all selected receiver locations and heights and that they represent a reasonable height / worse case for existing sensitive use/future anticipates heights at sensitive zone boundary.
 - Amend recommendations accordingly as applicable. Where there are noise breakout from internal areas not adequately assessed in the report, also include additional acoustic barrier/acoustic control measures.
- iv) **Acoustic barriers**
- Clearly confirm whether modelled results (for all noise sources including vehicles as well as child care centre) include any proposed acoustic barriers.
 - Where barriers are relied upon:
 - provide results with and without the barrier
 - show barrier location, height and extent, including along the interface with sensitive zones
 - demonstrate the barrier can be constructed as modelled.
 - Extend 2m high acoustic barrier for the full extent of adjoining sensitive zone boundary, unless compliance can be demonstrated without an acoustic barrier.
 - Include recommended barrier on proposed plans, and where access easement prevents acoustic barrier modelled, revise recommendation/modelling accordingly.
- v) **Report recommendations**
- Ensure all assumptions, modelling inputs, results that are critical in the forecasted noise compliance are clearly presented in the report recommendations.

Item 6 Response

NMS has provided an updated Noise Impact Assessment Report dated 4 September 2026.

Appendix D responds directly to Council's acoustic Information Request, with the supporting assessment and results contained in Section 4. The proposal adopts the report's recommended acoustic treatments and operational controls.

Child Numbers and Assessment Scenarios

Appendix D.1 confirms that the assessment models the full capacity of 147 children. The numbers associated with individual noise sources represent grouped sources within the model, rather than a reduced total occupancy.

NMS confirms separate assessment scenarios for:

- 147 children engaged in simultaneous active outdoor play; and
- 147 children engaged in simultaneous active indoor play.

Matter	Updated assessment basis
Child capacity	Full 147-child capacity represented through grouped sources
Outdoor activity	Simultaneous active play by all 147 children over the assessed one-hour period
Outdoor duration	Period-adjusted assessment described in Section 4.3.4, including three daytime hours and one evening hour



Indoor activity	Full-capacity active indoor play, with the period assumptions described in Section 4.3.5
Quiet activity	No allowance for sleep, quiet activity or passive play in the full-capacity source scenarios
Mitigation	Recommended acoustic barriers included in the principal assessment, with a separate no-barrier assessment also provided

The updated source information and Appendix D clarify the relationship between the grouped sources and full centre capacity. NMS considers the active-play assumptions conservative because quieter periods and activities are not used to discount the full-capacity source scenarios.

The assessment therefore addresses the substantive concern that the noise modelling may have been limited to fewer children than the proposed capacity.

Southern Façade Noise Breakout

Appendix D.2 explains the building arrangement and the principal noise-transmission pathways.

A corridor separates the playrooms from the southern façade, except for Room 9, which has no windows facing south. The northern sliding doors consequently represent the most significant indoor breakout pathway assessed by NMS.

NMS also considers sound passing through the corridor during entry and exit. It assesses this as brief and negligible in the relevant equivalent-noise descriptor.

The southern interface has therefore been considered in the acoustic assessment, with the adopted approach explained by the building layout and the relative significance of the transmission pathways.

Operating Hours and Early Morning Activity

The proposed operating hours remain 6.00 am to 7.00 pm.

The updated report assesses the 6.00 am to 7.00 am period and expressly recommends:

- no outdoor play before 7.00 am; and
- no rubbish collection before 7.00 am.

These restrictions form part of the proposed operating regime.

The distinction between opening the centre and commencing outdoor play or rubbish collection is important. It allows early arrivals and indoor activity to occur while controlling the external activities with greater potential to affect neighbouring amenity during the early morning.

The proposed hours extend beyond the applicable acceptable-outcome hours. The updated assessment and operational controls provide the performance-based justification under Childcare centre code PO2 and Community facilities code PO1 and PO2.

Subject to the recommended treatments and controls, the acoustic evidence supports retention of the lodged operating hours.



Sensitive Receivers and Assessment Heights

The updated assessment includes seven receiver locations, including the additional receivers at 74 Denham Street and 16 Child Street.

Table 1 identifies the adopted receiver heights. First-floor heights are assessed at the nominated northern and western receivers, while the relevant southern receivers are assessed at ground-floor height.

Appendix D.4 explains that the properties to the south are presently single-storey and that NMS is not aware of proposed or anticipated two-storey development at those locations.

NMS has therefore selected representative receiver locations and heights having regard to the existing sensitive uses and the development circumstances known to it. It has not modelled both ground and upper levels at every receiver or hypothetical upper-storey receivers at each southern boundary location.

Planning assessment of receiver selection

The relevant consideration is whether the selected receivers provide a reasonable basis for assessing the proposal's impacts on existing and reasonably anticipated sensitive uses.

In this instance, NMS has expanded the assessment to include the additional properties requested by Council and has explained its selection of receiver heights. For the southern properties, no particular future two-storey development or elevated receiver arrangement has been identified.

NMS advises that hypothetical elevated receivers can materially alter the effectiveness of conventional boundary barriers and lead to substantially different mitigation requirements. Without a defined future building arrangement, those additional requirements would be based on assumptions about development that may not occur in the form assessed.

The presence of a 2m acoustic fence is not, by itself, relied upon as demonstrating compliance. The proposal is supported by the quantitative assessment of the selected receivers and the technical explanation in Appendix D.

Having regard to that evidence, the adopted receiver selection is considered reasonable for this application. Further mitigation directed solely to an unspecified future upper-storey scenario is not considered warranted on the presently available information.

Acoustic Barriers and Results

The updated report includes additional acoustic fencing, including along the eastern interface.

Plate ES1 and Plate 6 identify the required locations and extents. Section 4.1 specifies 2m high acoustic barriers, continuous and gap-free, with a minimum surface mass of 12.5kg/m².

Section 4.4 presents the results with the recommended treatments. Table 14 predicts compliance with the adopted cumulative noise criteria at all seven receivers across the assessed day, evening and night periods.

Section 4.5 provides the requested assessment without the barriers. These results establish the importance of the recommended fencing, which forms an integral part of the proposal.

The barrier arrangement is consequently targeted to the assessed noise sources and sensitive interfaces. Its extent is supported by the modelling, rather than the application of identical treatment to every boundary irrespective of the predicted impacts.



Construction and Ultimate Access

The amended architectural plans incorporate the acoustic barrier locations and requirements identified by NMS.

Appendix D.5 advises that NMS is not aware of a conflict between the recommended fencing and easement access. Detailed design and construction will maintain the barrier continuity, effective height and surface mass relied upon in the assessment.

Gates, service penetrations and junctions must retain the required acoustic performance. Likewise, implementation of the ultimate access arrangement must maintain the necessary acoustic protection. Any alteration affecting a relied-upon barrier will require an appropriate replacement treatment or supporting acoustic assessment.

These requirements allow the acoustic outcome to be maintained as the development moves from the interim to the ultimate access arrangement.

Mechanical Plant and Implementation

NMS recommends selection, installation and, where necessary, screening of external mechanical plant so that noise does not exceed 37 dB(A) at nearby residential uses.

The centre will operate consistently with the activity assumptions and restrictions relied upon in the report. The recommended acoustic treatments and operational controls can be secured through conditions requiring their implementation and ongoing retention.

Taken together, the full-capacity assessment, expanded receiver set, additional fencing and operational controls provide a detailed response to Council's acoustic concerns. The material supports the proposed capacity and operating hours, while Appendix D provides the technical justification for the assessment matters where an alternative approach has been adopted.

Item 7 –

Stormwater Quality – Stormwater Quality Management Plan

Council's second Item 7

The site is a high-risk site from a stormwater quality perspective as it is greater than 2,500m² as per Section B of the Stormwater Code. The applicant therefore needs to demonstrate compliance with AO16 and AO17 of the Stormwater Code.

Section 4.2 – 4.5 of the Stormwater management plan by HCE Engineers and dated has recommended certain proprietary treatment devices to demonstrate compliance with the code.

- a) Provide a digital copy of the MUSIC modelling file (e.g. .sqz file) to support the proposed stormwater quality management plan.*
- b) Run-off are to be treated via the proposed devices as modelled in the MUSIC schematic presented in Section 4.3. Reflect and clearly outline the minimum number/type of proprietary treatment device as modelled in the report and reflect the details of specific location and size/number of devices on the proposed stormwater management plans to further demonstrate that the modelled stormwater quality treatment results can be implemented.*

Item 7 Response

The updated HCE Stormwater Management Plan and accompanying digital MUSIC model are provided in Attachment E.

The treatment arrangement includes:

- OceanGuard filters, or an approved equivalent, at all internal stormwater inlets; and
- four StormFilter cartridges within the on-site detention tank.

The Concept Services Plan identifies the treatment arrangement and tank location. HCE's Engineering Information Request Response confirms the minimum cartridge number and treatment of the internal inlets.

Section 4.3.3 and Table 15 of the Stormwater Management Plan report the following MUSIC results:

Pollutant	Required reduction	Modelled reduction
Total suspended solids	80%	89%
Total phosphorus	60%	60%
Total nitrogen	45%	50%
Gross pollutants	90%	100%

The modelling predicts achievement of each nominated pollutant-reduction target.

The documented treatment system consequently supports the contaminant-management outcome sought by Stormwater code PO16 and the design approach under AO16. The digital model allows Council to review the catchments, treatment nodes and underlying assumptions directly.

In relation to PO17, the stormwater treatment system is not proposed as a means of wastewater disposal.

Construction-phase controls are addressed in the Stormwater Management Plan. Section 4.5 and the maintenance appendices establish the ongoing maintenance requirements for the proprietary treatment devices.

The proposed system will be implemented and maintained consistently with the approved design and modelling. The updated documentation therefore addresses both the predicted treatment performance and the measures required to achieve that performance on site.

Item 8 –

Proposal Plans – Natural Ground Level

Council's second Item 8

Provide revised sections/ elevations clearly notating the Natural Ground Level (N.G.L.) defined under Brisbane City Plan 2014.



Item 8 Response

The amended architectural sections and elevations identify natural ground level separately from the proposed finished levels.

The drawings establish the building's relationship to the existing landform and allow Council to assess building height and the proposed changes to ground levels.

The revised sections and elevations are included in Attachment A.