

12 May 2026

Job Ref: B3602-A8-DA26

Brisbane City Council  
GPO Box 1434  
BRISBANE QLD 4001

Att: Development Assessment (Justin Lynham)  
via [DSPlanningSupport@brisbane.qld.gov.au](mailto:DSPlanningSupport@brisbane.qld.gov.au)

**Response to Information Request– 69-73 Kraft Rd, 136-152 Laxton Rd & part 26 Trivior Street, Pallara QLD 4110  
– Council Ref: A006935362**

Dear Sir/Madam,

We refer to Council's Information Request dated 9 March 2026 regarding the abovementioned application.

In accordance with s13.2 of the *Development Assessment Rules*, we hereby provide all of the information requested. In support of our response, please find **enclosed** the following documents for assessment:

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| <b>Attachment A.</b> | Updated Reconfiguration Plan prepared by JFP Urban Consultants                  |
| <b>Attachment B.</b> | Updated Engineering Concept Plans prepared by JFP Urban Consultants             |
| <b>Attachment C.</b> | Updated Site based Stormwater Management Plan prepared by JFP Urban Consultants |
| <b>Attachment D.</b> | Updated Concept Rehabilitation Plan prepared by JFP Urban Consultants           |
| <b>Attachment E.</b> | Structure Plan prepared by JFP Urban Consultants                                |

In response to the request, and as further detailed below, we note that the proposed development has been amended as follows:

1. The footpath offset from the Kraft Road site boundary has been amended to satisfy Council's request. Along Laxton Road, the footpath offset has been amended to accommodate the electrical pillars sited in accordance with Energex requirements and to facilitate tree retention.
2. The pavement of Road 1 has been moved to provide a 5.25m verge on its southern side. This reduced the width of the verge with the swale from 8.25m to 7.25m.
3. A footpath is proposed along Road 6 as requested.
4. The driveway crossovers of lots 35 and 36 have been consolidated to enable sufficient room for the MGBs to be presented outside of the frontages of adjoining lots.
5. A pad-mounted transformer (PMT) has been located along the new local road near proposed Lot 22 in accordance with Energex requirements, including being outside of the Q100 flood level. The PMT has been sited to ensure retention of existing trees.

In accordance with Schedule 2 of the *Planning Act 2016* (the Act) and Schedule 1 of the *Development Assessment Rules*, we confirm that the above changes do not:

- result in a substantially different development;
- seek approval for prohibited development;
- require the application to be referred to any additional referral agencies;
- change the type of development approval sought; or

- require impact assessment for any part of the changed application, if the original application did not involve impact assessment.

Our responses to the outstanding issues are as follows:

## Stormwater

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1. The flood analysis sensitivity scenario is required to include AR&R climate change provisions, especially as it is downslope of a basin. This could be a simple factoring up of the 1987 IFD used in the hydrology in accordance with SSP2-4.5. It must be ensured that new lots do not flood as a result of this sensitivity scenario. In addition, sensitivity analysis should include the risk to adjacent lots on Laxton Road and lots along the new neighbourhood road in the case of a dam failure.
  - a. Provide an amended Flood Report in accordance with PO17 and PO18 of the Flood overlay code to include a sensitivity analysis as detailed above.

### Response

Please refer to section 4.6 of the enclosed updated Site based Stormwater Management Plan prepared by JFP Urban Consultants for the 2% AEP sensitivity scenarios. The results confirm that the new lots remain flood free with climate change provisions. The results further confirm that the new lots on Laxton Road remain flood free in the case of a dam failure.

2. The Laxton Road frontage requires a standard Type D kerb and channel with verge that includes the provision of gullies prior to entrance into the site through the proposed neighbourhood road. Furthermore, a stormwater upslope connection along the Laxton Road frontage to the boundary of 120 and 168 Laxton Road must be provided for connection to the trunk stormwater system.
  - a. Provide amended plans in accordance with PO3 and PO11 of the Stormwater code and PO4 of the Infrastructure design code that addresses issue raised above.

### Response

Standard Type D kerb and channel is proposed on Laxton Road as well as the gully pits. The verge profile has been determined with Arborist input to minimise risk to the existing trees on the verge.

Stormwater upslope connections can be provided along Laxton Road for the adjacent properties 120 and 168 Laxton Road. Refer to updated Engineering Concept Plans prepared by JFP Urban Consultants for further details.

3. Downstream owner's permission is required to construct trunk stormwater drainage along with an easement in favour of Council for underground drainage purposes, alternately a notice of intent to resume land for provision of such infrastructure by the Queensland Government should be provided.
  - a. Provide amended plans and downstream owners consent in accordance with PO19 of the Stormwater code to assure that downstream trunk infrastructure will be constructed prior to the completion of this development.

### Response

The delivery of the proposed development is currently dependent on the delivery of Council's trunk stormwater infrastructure. Downstream consent from the relevant owners may not be required depending on the timing of the construction of the trunk infrastructure. It is anticipated that the development will be delivered once trunk stormwater infrastructure is provided.

4. Council may consider a performance outcome with no provision for stormwater quality basins; however, this would require street tree Water Sensitive Urban Design (WSUD) treatments in local streets (i.e. 1 WSUD for every 3 lot frontages). In addition, the Stormwater Report should provide qualitative statements about why a non-basin

option is an acceptable outcome for this large site and commentary on how the neighbourhood road swale, drainage reserve rehabilitation/dedication areas and end of line wetland treatments may all contribute to improve quality of the waterway health.

- a. Provide amended plans in accordance with PO15 of the Stormwater code that show stormwater quality targets are met with or without the provision of a bio-bason.

### Response

Refer to section 6.2 of the enclosed updated Site based Stormwater Management Plan prepared by JFP Urban Consultants for further detail on how the stormwater quality targets are met. Tree pits are proposed throughout the proposed development.

### Traffic

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5. The southeastern verge along the central neighbourhood road must be on a consistent 5.25m alignment along the whole corridor between Laxton Road and Sweets Road through all developments. This will enable future works by Council for a shared path outcome feasible. Footpaths along this verge must be on a 1m alignment from the private lot boundaries. Trees, road furniture, stormwater infrastructure and signs must also be proposed in consideration of not prejudicing the future shared path.
  - a. Provide amended plans and reports in accordance with PO1 of the Transport, access, parking and servicing (TAPS) code and the Stormwater code that show road and footpath alignments in accordance with the above requirements.

### Response

The neighbourhood road between Kraft and Laxton Roads is designed in accordance with the Pallara Concept Drainage Masterplan December 2023, which requires the following:

- New 20m Road Reserve with 7.5m Pavement (one-way 3% cross fall) & Type G kerb:
- Direct lot access only on high side of road
- 500mm deep channel with 1V:4H batters on low side
- 2m area between lots and channel for informal access.

As the neighbourhood road has been designed in accordance with these requirements which go beyond the requirements of a Neighbourhood Road in the Brisbane Standard Drawings, there is to be no further reserve widening possible to accommodate further items such as a shared path, which can be accommodated in the provided 20m wide road reserve. Notwithstanding this and as demonstrated in the enclosed Engineering Concept Plans prepared by JFP Urban Consultants, a 5.25m wide verge is provided on the southern side of the new neighbourhood road via a minor amendment to the cross section within the 20m corridor.

6. It is noted the four-way intersection of the new Neighbourhood Road and Kraft Road is offset relative to the proposed road alignment between Kraft Road and Sweets Road. This off-set separates right turn movements, avoiding an overlap of queues. While the off-set of the Neighbourhood Road corridor across Kraft Road, based on the proposed alignment and the proposed alignment over 70 to 78 Kraft Road (Ref: A006952466 – currently under assessment), is relatively small the Neighbourhood Road is anticipated to accommodate bus services.
  - a. Provide amended plans in accordance with PO1 of the TAPS Code that show a compliant 4-way intersection to the new Neighbourhood Road and Kraft Road. Vehicle swept path demonstrating that 14.5m long single unit buses are able to safely negotiate the off-set four-way intersection, is also required.

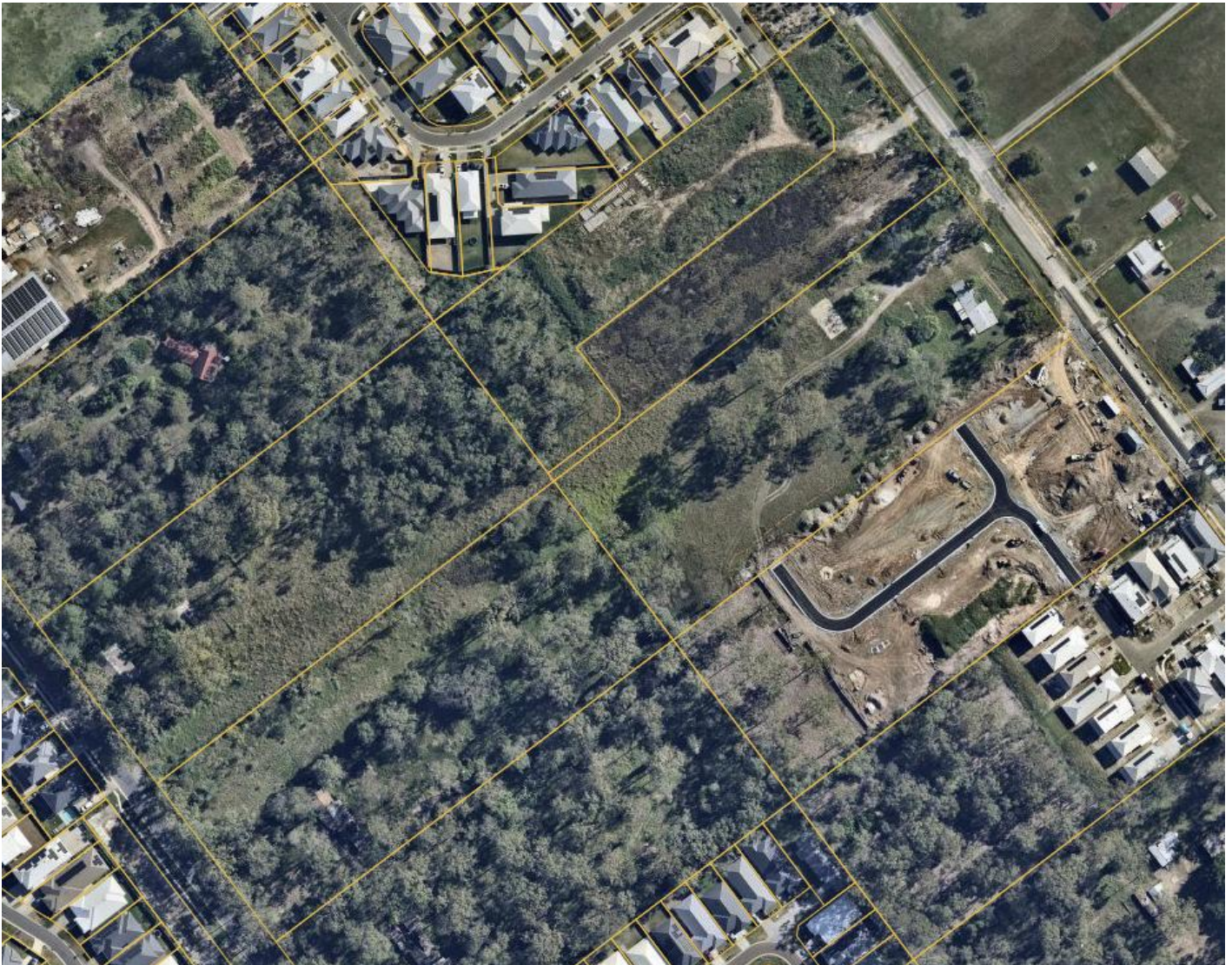
### Response

The enclosed updated Engineering Concept Plans prepared by JFP Urban Consultants include a swept path which demonstrates that a 14.5m long single unit bus can safely negotiate the off-set four-way intersection at Kraft Road.

7. Temporary access easements and manoeuvring areas will be required at the interim terminations of the new road to the south (around lots 9, 10 and 26) if the local roads approved in the adjoining development (Ref: A006728398) have not been constructed to allow the Refuse Collection Vehicle (RCV) to circulate.
  - a. Provide amended plans in accordance with PO19 of the TAPS code that show a temporary turn around areas for RCV along Road 2 & 3, along with swept path drawings demonstrating compliant manoeuvring through the temporary turn around area.

#### Response

We note that the adjoining development to the east (A00) is currently under construction as demonstrated in the below Nearmap imagery taken on April 2026:



We anticipate that construction of the development will continue to progress and be completed shortly. Should Council consider it necessary and if the Applicant has not undertaken plan sealing once the proposed development is approved, conditions can be imposed and plans marked up requiring temporary turnarounds over proposed lots 8 or 11 and 25, ensuring all vehicle manoeuvring occurs in the subject site. It is acknowledged that this requirement will be unlikely.

8. The proposed footpaths on the Kraft Road and Laxton Road frontages are required to be on a 0.5m alignment from the lot boundaries. This should also tie into the existing footpaths on either side of the development site. A 2.0m clearance next to the footpath is required for a future cycle path, which must be kept clear of trees, service pits, street lamps, and any other obstructions. Furthermore, a footpath should be provided on at least one side of proposed Road 6.

Provide amended plans in accordance with PO4 of the Infrastructure design code and feedback above that show:

- a. Footpath on 0.5m alignment from property boundary on both Kraft and Laxton roads;

**Response**

Please refer to the enclosed updated Engineering Concept Plans prepared by JFP Urban Consultants which include footpaths situated 0.5m from the property boundary along Kraft Road and lot 58 adjoining Laxton Road. A 0.75m footpath offset is provided in Laxton Road along lots 54-58 due to conflicts with the electrical pillars sited in line with Energex requirements and existing trees. Non-standard footpath offsets are provided where the footpath conflicts with existing trees, particularly along lots 54, 59 and 83.

- b. Footpath along Road 6; and

**Response**

Please refer to the enclosed updated Engineering Concept Plans prepared by JFP Urban Consultants which proposes a footpath along Road 6.

- c. Provide updated plans and reporting regarding street tree impacts including to the Tree Protection Zones.

**Response**

Works that impact on the Tree Protection Zones of trees to be retained are detailed in the enclosed updated Engineering Concept and Tree Retention Plans prepared by JFP Urban Consultants, the latter of which will be provided under separate cover and includes the PMT which won't result in adverse impacts to trees identified for retention. Please refer to those plans for further details.

9. It is noted the subject site is more than 7,000m<sup>2</sup>, within in the Low density residential zone and will create more than 20 lots.

- a. In response to AO18.1 of the Subdivision code (Section C1) provide a Structure Plan demonstrating is designed, sited and integrated with roads, pathways and infrastructure of surrounding land uses and developments.

**Response**

The enclosed Structure Plan prepared by JFP Urban Consultants addresses the above item and includes detail of how the proposal will interact with nearby and adjoining existing and proposed developments as well as sites with limited development application history. The Structure Plan also demonstrates how the proposed ecological corridor will enable a continuous ecological corridor across other sites, mapped areas of environmental significance and an indicative four-way intersection with the proposed central road, Kraft Road and the central road proposed as part of A006952466.

**Waste Management**

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10. It is noted proposed Lots 35 and 36 have constrained frontage with an insufficient kerbside presentation area for the collection of two (2) x 240L mobile garbage bins (MGBs) per lot. Furthermore, MGBs are not to be presented on crossovers, kerb tapers or adjoining lots as such shared crossover for lots 35 and 36 can be considered.

- a. In response to PO4/AO4.1 of the Subdivision code and PO8/AO8.1, AO8.2 of the Infrastructure design code, provide amended plans MGBs that show sufficient kerbside presentation for two (2) x 240L MGBs per lot.

#### **Response**

Please refer to the enclosed updated Engineering Concept Plans which consolidate driveway crossovers for lots 35 and 36, allowing for these lots to present their MGBs at the kerbside outside of adjoining lots.

#### **Building Envelope Plan**

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11. It is noted the application has included a Building Envelope Plan which notates built to boundary walls at a height of 3.5m.
  - a. Provide an amended Building Envelope Plan than includes built to boundary wall heights at a maximum height of 3m in accordance with the acceptable outcomes of the Dwelling house small lot code.

#### **Response**

The Building Envelope Plan prepared by JFP Urban Consultants notates built to boundary walls at a height of 3.5m, which accords with PO6 of the Dwelling House (Small Lot) Code, being a marginal exceedance of the specified Acceptable Outcome of 3m applicable in the Low Density Residential zone. We also note that the same notation was included in approved Building Envelope Plans for 53 and 61 Kraft Rd ([A005613942](#)), 85 Kraft Rd ([A006725011](#)) and 94-102 Kraft Rd & 169 Sweets Rd ([A005777160](#)), the former two adjoin the subject premises and all of these approvals are in the Low Density Residential zone. The relevant provisions in AO6/PO6 of the Dwelling House (Small Lot) Code at the time these applications were lodged are identical to those in the current Planning Scheme.

Furthermore, AO6(c)(iv) is intended for zones predominantly utilised in more established residential areas and where the adjoining premises are established suburban residential development. It is noted that the subject site is commensurate to a greenfield area (Pallara) which is yet to be developed for urban purposes.

We note that as the development does not propose any built-to-boundary walls adjacent to the adjoining premises and instead proposes side and rear setbacks that accord with AO6(a) and AO7, respectively, the provisions of PO6(a) and (b) are satisfied in relation to adjoining premises. PO6(b) as it relates to internal built-to-boundary walls to the site can be addressed by the Applicant at the building design stage.

#### **Plans and Reports**

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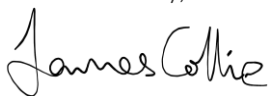
12. Provide updated plans including engineering and ecology plans / reports along with civil engineering drawings, that reflect changes made to the above requirements.

#### **Response**

In response to the above note, all plans and reports have been updated to reflect the above requested changes.

This correspondence and attachments represent a response to all the information requested, in accordance with s.13.2 of the *Development Assessment Rules*. We trust the above and enclosed information satisfactorily addresses the request and we look forward to receiving Council's draft conditions following public notification of the application. Please do not hesitate to contact the writer on 07 3012 0100 should you have any questions.

Yours faithfully,



**JAMES COLLIE**  
TOWN PLANNER  
JFP URBAN CONSULTANTS