



I.B. Town Planning

ABN: 74 571 742 254
PO Box 501, Kallangur, Qld 4503

Phone: 3480 5066
Email: matt@ibtownplanning.com
Job Ref: MW2496

12 August 2026

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

Attention: Dominic Hudson
Senior Urban Planner
Planning Services North
Development Services

Dear Dominic

**RE: MATERIAL CHANGE OF USE (MULTIPLE DWELLING)
80 BARRETT STREET, BRACKEN RIDGE Q 4017 (LOT 42 S2717)
RESPONSE TO COUNCIL'S INFORMATION REQUEST
APPLICATION NUMBER: A006662187**

I refer to the above application and Council's information request dated 17 January 2025, and subsequent notices stopping or extending the response period, which is due to end on 17 August 2026. In response to the issues raised, the following information is provided:

INFORMATION REQUEST:

Flooding and Stormwater Management

Item 1 (Council Item 1) – Flood Study

This site is in the major flow path for the upslope catchment. The development application must be supported by a flood study and significant changes to the proposed development may be required.

a) A RPEQ flood study must be provided to support the development. This study must model the following scenarios:

- I. Existing – including the constructed development on 153 Denham Street,
- II. Developed – Including the impact of any obstruction of the development,
- III. Ultimate development – including the surrounding development approvals that involve filling to ensure the development will have the appropriate flood planning levels and also ensuring that approved developments are not adversely impacted.

b) The entire development will need to be suspended at least 1.5m above existing ground level and all private open space must be suspended whilst maintaining a minimum of 35m² of private open space per unit. This will require significant changes to the proposal.

c) Please be advised that an easement will be required over flooded areas of the site in favour of Council.

RESPONSE

Refer to the Flood and Stormwater Management Plan prepared by Engeny Australia Pty Ltd, Ref BNE01902_0001-REP-001-2, Rev 2, dated 4 June 2026. The report includes TUFLOW rain-on-grid modelling for the existing and developed scenarios and includes consideration of adjacent approved and proposed developments.

The proposal adopts a finished floor level of RL 7.700m AHD, with cut drainage pads at RL 6.200m AHD and achieves flood immunity requirements.

Private open space areas of at least 35m² per unit are shown on the amended Proposal Plans Rev H, including raised decks, each having an area of at least 15m² and associated drying courts and landscape areas.

Council's request for an easement over flood-affected areas is acknowledged. The final easement extent can be confirmed through detailed survey and engineering design, consistent with Council's requirements.

Item 2 (Council Item 2) – Site-Based Stormwater Management Plan

A site-based stormwater management plan (SBSMP) must be provided to demonstrate the lawful point of discharge (LPD) for the site, in compliance with *SC6.16 IDPSP Chapter 7 Stormwater drainage*.

RESPONSE

The above referenced Engeny report incorporates the SBSMP and confirms the site's lawful point of discharge to Barrett Street.

The civil plans show the proposed stormwater drainage network and 37m² bioretention basin, and MUSIC modelling confirms compliance with water quality targets.

Flood afflux mapping indicates no adverse flood impacts to adjoining properties for assessed events up to the 2% AEP.

Item 3 (Council Item 3) – Building Work Assessment

As the proposal is within the Overland flow sub-category of the Flood overlay, Building work is made assessable in addition to the Material change of use. Submit amended DA Forms seeking approval for Building work and Material change of use aspects of development.

RESPONSE

Amended DA Form 1 and the relevant parts of DA Form 2 are enclosed, seeking approval for Material Change of Use and associated Building Work.

Item 4 (Council Item 4) – Earthworks

The earthworks plan submitted lacks sufficient information and details and the following information is required:

- a) Provide an engineering concept earthworks plan (reviewed and signed by an RPEQ engineer) and supported by a contour survey plan that shows the existing levels of the land (AHD) Datum, proposed levels of the land (AHD) Datum, levels of the road, the proposed access, existing services, trees; buildings and ancillary to be removed.
- b) If proposing retaining walls, evaluate that those walls are not to obstruct the overland flow path and provide the design with details (i.e. proposed walls location, height, type, subsoil drainage, wall arrangement and setback distances to property boundaries, existing surface levels on the adjoining lands and the drainage regime maintained). The concept earthworks plan is to address the Filling and excavation code, Stormwater code, and the flood requirements.

RESPONSE

Refer to the Civil Plans prepared by Webcon Pty Ltd and DALK Consulting Pty Ltd and certified by Keith Howells RPEQ 7295, together with the amended Proposal Plans Rev H.

The civil package includes a site plan, stormwater drainage plans, retaining wall layout, retaining wall details and site sections showing existing surface levels, proposed FFLs, finished driveway/platform levels, cut/fill areas, drainage infrastructure, bioretention basin details and retaining wall arrangements.

The plans confirm that stormwater conveyance is maintained through the site, including culvert/opening arrangements and drainage infrastructure consistent with the Flood and Stormwater Management Plan.

Item 5 (Council Item 5) – Bushfire

The proposed development is mapped under the Queensland Government's Natural hazards, risk and resilience mapping triggering the requirement to respond to the relevant state assessment benchmarks. No bushfire management information has been provided to support this application so it is unclear as to what level of bushfire hazard exists and whether the development is appropriately set back from hazard where it exists. It is also unclear as whether the development is designed to accommodate the management of any potential bushfire hazard e.g. appropriate access and egress for emergency vehicles.

- a) To support this application, provide an assessment against the Natural hazards, risk and resilience benchmarks. Note that responding to and complying with Council's Bushfire overlay code is a means of demonstrating compliance against state benchmarks.

RESPONSE

Refer to the Bushfire Management Plan prepared by Wollemi Eco-Logical Pty Ltd (Project Ref 25595, dated 20 October 2025, prepared by Scott Edwards – a suitably qualified bushfire consultant with over 24 years' experience).

The BMP addresses the State Planning Policy (Natural Hazards – Bushfire), AS3959:2018, the QFES Bushfire Resilient Communities Technical Reference Guide, and the Bushfire overlay code at section 8.2.5 of City Plan 2014.

The BMP confirms that high potential bushfire hazard is limited to vegetation north of the site, located more than 20m from the site and more than 26m from the proposed development footprint. The assessment concludes that no APZ is required within the development footprint, and that access/egress and firefighting water supply can comply with relevant QFES and planning scheme requirements.

Item 6 (Council Item 6) – Significant Vegetation

Vegetation within the site is protected by NALL Significant Native Vegetation (SNV) and Significant Urban Vegetation (SUV) categories. A large Hoop Pine near the entrance appears to meet the criteria of Significant Vegetation as described in Section 2 of the Vegetation planning scheme policy. The large trees along the western boundary should also be retained for their contribution to site amenity and local landscape character.

a) Provide an Arborist Report prepared by a min AQF Level 5 Arborist to identify and report on existing trees protected by NALL within the development site. The Arborist Report must include:

i) A Tree Survey, surveyed in location, showing tree locations and canopies, cross-referenced to a Tree Schedule containing specifications (species name, height, canopy diameter, DBH, SRZ, TPZ), and information on tree health and form for assessment.

ii) Clear photos as supporting evidence of reported findings;

iii) An assessment of trees meeting the criteria of Significant Vegetation as described in Section 2 of the Vegetation PSP.

iv) The Report must include:

1. On-site trees with a dbh of 250mm or greater, where located within 6m of the site frontage, 6m of the western side boundary, or within the identified Ecological corridor along the rear boundary;

2. Trees on adjoining sites with a dbh of 250mm or greater, where located within 10m of a site boundary.

b) Provide a revised proposal that allows for the healthy retention of on-site trees meeting the criteria of Significant Vegetation as per Section 2 of the Vegetation PSP. Retention of the existing Hoop Pine and large canopy trees along the western boundary should be prioritised to comply with PO27 / AO27.1 and AO27.2 of the Multiple dwelling code. Other Significant Vegetation identified within the site frontage and along the rear boundary should also be identified and retained to comply with AO28.1 and Overall outcome 8(a) of the Bracken Ridge and district neighbourhood plan.

RESPONSE

Refer to the Arboricultural Assessment Report by Trees are Cool (dated 24 November 2025), prepared by Jess Hamer and Matt Gordon, both AQF Level 5 qualified arborists.

The report includes Tree Management Plans, Tree Assessment Tables and a methodology consistent with AS4970-2009 (Protection of Trees on Development Sites). The report identifies trees to be retained, addresses Natural Asset Local Law (NALL) requirements, and nominates protective measures including fencing of Tree Protection Zones (TPZ) and Structural Root Zones (SRZ).

The existing Hoop Pine, identified as T01 *Araucaria cunninghamii*, is nominated for retention in conjunction with project arborist supervision and tree protection measures.

The amended Proposal Plans Rev H reflect the tree retention/removal strategy, including retention of nominated frontage, western boundary and rear boundary trees, with removals limited to trees impacted by the construction footprint or otherwise recommended by the arborist. The strategy also considers the recently approved development on the adjoining site to the east, including vegetation clearing near the common boundary in that Council approval. This strategy has been coordinated with the Landscape Concept Plan.

Item 7 (Council Item 7) – Landscape Concept Plan

A Landscape concept plan is required to demonstrate that landscape outcomes for the site comply with the relevant benchmarks including the Landscape work code and Multiple dwelling code – PO27, PO28, PO29, PO30.

a) Provide a Landscape concept plan prepared by a suitably qualified Landscape Architect that addresses the following specific requirements:

- i) Retention of Significant Vegetation in deep planting areas.
- ii) Landscaping including adequately sized deep planting along the site frontage to retain significant vegetation or establish shade canopy trees.
- iii) Useable private open space in accordance with PO31 with adequate dimensions to integrate side boundary buffer planting in min 1.5m wide garden beds.
- iv) A Planting Palette with details of proposed trees, shrub, and groundcover species.
- v) Details of proposed landscaping materials and specifications.
- vi) Where retaining walls are proposed within or adjacent to landscaped or tree retention areas, provide existing and proposed finished levels, together with detailed sections to indicate the location of walls, footings and underground services, wall heights and materials.
- vii) The landscaping proposed will need to accord with any flood requirements affecting the site and development.

b) It is noted the deep planting to the frontage is limited to the northern and southern corners of the site whilst the overall deep planting calculations are bolstered by the ecological corridor at the rear of the site. While the ecological corridor is supported, it is considered there is sufficient space in the site to provide greater deep planting outside of this corridor which will improve the development outcome and amenity of the proposal. The submitted plans show substantial green/open space at the front of the development and in the areas between the buildings north and south of the visitor parking. It is unclear what uses these areas are proposed to be used for and amended proposal plans and landscape plans should provide for additional deep planting in these areas.

RESPONSE

The Landscape Concept Plan prepared by a Registered Landscape Architect identifies retained trees, deep planting areas, frontage and side boundary planting, screening trees and shrubs, understorey planting, bioretention basin planting, communal open space embellishment and a detailed plant palette/specification.

The amended Proposal Plans Rev H confirm deep planting of 405m², equivalent to 10% of the site area, and communal open space of 692m², equivalent to 17% of the site area.

Item 8 (Council Item 8) – Access Location

The proposed location and type of the access crossover requires review as it conflicts with the existing traffic control device (speed restriction device) at the frontage of the site. Access to the development is not supported through the traffic control device.

- a) The location of the access crossover to the site, width and type needs to be reviewed by an RPEQ engineer and repositioned to provide for an optimal access location, without conflicting and/or impacting existing traffic devices or any other road infrastructure or creating an adverse impact on the road.
- b) The access crossover and driveway needs to cater for service vehicles being an LRV (occasional access) for furniture removalist and RCV for regular access for refuse bin collection (refer to refuse item below). If proposing a performance solution, it must be supported by an RPEQ prepared traffic statement.

RESPONSE

Refer to the Q Traffic response prepared by Richard Quinn, RPEQ, which confirms that the centrally positioned access driveway remains the appropriate access arrangement for the site. Relocation of the driveway is not considered practical or feasible given the efficient layout of units on each side of a central driveway.

To address the existing conflict with the speed restriction device in Barrett Street, the Q Traffic response proposes relocation of the speed hump approximately 14m to the west, clear of the proposed access driveway, as part of the frontage works. Q Traffic confirms the relocated speed hump will remain functional, with approximately 14.4m separation to the existing childcare access and approximately 5.7m separation to the proposed access, and does not contravene any identified requirement of Council's TAPS Planning Scheme Policy.

The access crossover and driveway design is supported on the basis of a 6.5m wide driveway with Type B2 splays.

Item 9 (Council Item 9) – Access Swept Path Manoeuvring

Provide RPEQ endorsed swept path manoeuvring drawings for the following design vehicles; being an LRV and RCV (as specified in BSD 3008-2) demonstrating that safe and efficient service is achieved within the site.

RESPONSE

The RPEQ-endorsed swept path drawings demonstrate movements for a 12.5m HRV, which is adopted as a conservative design vehicle for occasional furniture removalist access, and a 10.24m rear-load RCV for refuse collection. The swept paths are certified by Richard Quinn RPEQ 08565 and confirm that service vehicles can reverse into the site, complete servicing within the driveway area and exit in a forward direction.

Item 10 (Council Item 10) – Parking Layout and Dimensions

Provide a revised and dimensioned layout plan that shows:

- a) The proposed garages and visitor parking bay dimensions (length and width), parking aisle free of any obstructions. The aisle width needs to be demonstrated as able to cater for a service vehicle and to achieve the required clearances (horizontal and vertical).
- b) The amended design is to make provision for bicycle spaces for visitors (minimum 4 bicycles spaces) in common areas and also demonstrate a minimum of 1 resident bicycle space per unit.

RESPONSE

The amended plans and Q Traffic material confirm the relevant parking layout and dimensional outcomes. The amended plans provide six visitor spaces, exceeding the minimum four required. Visitor parking bays are shown with dimensions of 5.4m x 2.6m, and the garages provide internal dimensions of 5.8m x 6.0m. The parking aisle has an effective width of 6.5m measured between landscape build-outs.

The Q Traffic response confirms that service vehicles will use the section of driveway immediately inside the frontage boundary, prior to the units. This section of driveway has a gradient of 1:20, is open to the sky above and is 6.5m wide, providing clearance for refuse collection vehicle movements.

The amended plans also make provision for four visitor bicycle parking spaces in the common area near Unit 1. Resident bicycle parking can be accommodated within the enclosed garages, including by wall-mounted racks above the nose of parked vehicles, consistent with the approach identified in the Q Traffic response.

Item 11 (Council Item 11) – Refuse

It is noted the development proposes kerbside collection for 14 dwellings. Kerbside collection is supported under the Planning scheme where there are a maximum of 10 units and therefore onsite collection is prescribed for this proposal. In accordance with PO32/AO32 of the Multiple dwelling code and PO8/AO8.1, AO8.2 of the Infrastructure design code, provide the following information and demonstrate on amended plans:

- a) Demonstrate a minimum 6.5m wide Type B2 crossover and minimum 6.5m wide internal aisle where trafficked by the Refuse Collection Vehicle (RCV). Ensure the minimum 6.5m wide clearance also includes the upper levels of the townhouses and any other built form.
- b) Demonstrate a roofed and wholly screened refuse enclosure with minimum internal dimensions of 8.6m x 1.5m (12.9m²) to accommodate bulk bins. Ensure the dimensions are included on the amended plans.

RESPONSE

The amended Proposal Plans Rev H and Q Traffic report provide for onsite refuse collection. The plans show a roofed bin enclosure with internal dimensions of 4.0m x 5.2m, providing 20.8m² to accommodate six 1,100L bulk bins. Q Traffic confirms that a 6.5m wide driveway with Type B2 splay is proposed and that the 10.24m rear-load RCV can service the site from the driveway area. The refuse enclosure is located adjacent to the access driveway and is roofed and wholly screened through coordinated built-form and landscape treatments.

Item 12 (Council Item 12) – Secondary Codes

Some of the secondary code responses state the assessment benchmarks will be addressed with the future phase of the project at the Operational works (OPW) applications. However, insufficient detail has been provided to carry out a full assessment against the Planning scheme at this time, and a review by a suitably qualified professional engineer and concept engineering plans, must be provided in support of the proposal.

- a) Provide conceptual engineering plans addressing the Filling and excavation code, Flood overlay Code, Stormwater Code, the Infrastructure Design Code and the TAPS Code, supported by an engineer statement against each of the secondary codes, demonstrating how the development site achieves compliance.

RESPONSE

RPEQ certified civil engineering plans are enclosed addressing earthworks, retaining walls, stormwater drainage, driveway gradients and bioretention infrastructure. The Flood and Stormwater Management Plan provides the stormwater assessment, lawful point of discharge, flood modelling and Flood overlay code response. The Q Traffic report provides the TAPS code assessment. Together, these documents provide the engineering basis for assessment against the Filling and excavation code, Flood overlay code, Stormwater code, Infrastructure design code and TAPS code, supplementing the application material provided at lodgement.

Item 13 (Council Item 9) – Water and Sewer (Services Advice Notice)

It is noted the submitted assessment report states that the site has access to all services (including water and sewer). However, the proposal has not been accompanied with a SAN from Urban Utilities to demonstrate that it can be serviced from water and sewer perspective. In accordance with PO9 of the Infrastructure design code submit a Services Advice Notice (SAN) from Urban Utilities to demonstrate that the proposed development can be serviced adequately from a water and wastewater perspective.

RESPONSE

Coordination of water and wastewater servicing is in progress and it is understood that the development can be serviced through final detailed design via an extension of the 150mm sewer main servicing the adjoining site to the west and connection to the 150mm water main in the verge fronting the site. Urban Utilities Services Advice Notice can be provided upon issue if required by Council prior to determination of the application.

Item 14 (Council Item 10) – Balconies to the Street

The proposal does not incorporate appropriate balconies to Barrett Street to create visual interest, modulation and articulation in the facade. In its current form, the proposal does not reinforce the street edge and desired character of the area or contribute to the form and detail of the building. This does not adequately address AO9.3, AO9.4 / PO9 or AO11.3 / PO11 of the Multiple dwelling code. Therefore, revise the layout to incorporate balcony elements to the front townhouses facing the street.

RESPONSE

The amended Proposal Plans Rev H revise the Barrett Street interface incorporating balconies, windows, shading devices and variations in cladding to the townhouses fronting Barrett Street. These changes facilitate visual interest, façade articulation and passive surveillance, consistent with the outcomes sought by the Multiple dwelling code.

Item 15 (Council Item 11) – Side Facing Balconies

Each of the units provide private open space in the form of courtyards oriented to the side boundaries. Noting the need to suspend these spaces above a minimum 1.5m undercroft to address site flooding it is anticipated that these spaces will become balconies located higher than potential side boundary fences. In revising the proposed development it will be necessary to demonstrate that these spaces will not result in overlooking and privacy impacts to adjoining properties and it may be necessary to increase side setbacks to these spaces to avoid raised balconies built directly to the boundaries.

RESPONSE

The amended plans incorporate side-facing private open space arrangements and boundary treatments, including 1.5m high privacy screens to balconies where required to mitigate overlooking to adjoining properties.

Item 16 (Council Item 12) – Communal Open Space

It is unclear as to the uses and facilities provided in the nominated communal open space which does not adequately address AO30.1 / PO30 of the Multiple dwelling code. Additional information and plan detail is required to clarify that the communal open space will provide a range of recreational facilities as an appropriate response in its use to the future residents.

RESPONSE

The amended Proposal Plans Rev H provide communal open space of 692 square metres equating to 17% of the site area, exceeding the minimum required by the Multiple Dwelling Code. The communal open space is located to capture solar access, is accessible to all units, and is separated from private open space. The enclosed Landscape Concept Plan confirms communal open space embellishment including pergola/seating, exercise equipment, planting and landscape treatments.

Item 17 (Council Item 13) – Pedestrian Access

The site layout does not demonstrate an appropriate prioritized pedestrian pathway from the street to the individual units. Provide amended plans incorporating a pathway demarcation to address the concerns of the shared pedestrian / vehicle driveway. This pedestrian pathway is to be of a different material and finish annotated on the drawings that is adjacent to the ground floor entrances to each townhouse (painting is not acceptable).

RESPONSE

The amended Proposal Plans Rev H and Landscape Concept Plan identify a dedicated pedestrian path from Barrett Street into the development from Barrett Street to the entrance to each dwelling. The pathway is demarcated from the shared driveway environment and will be delivered in a contrasting surface finish. The Q Traffic Report confirms that the proposed pedestrian pathway complies with the relevant outcomes of the TAPS Code.

Item 18 (Council Item 14) – Services to the Street Frontage

It is unclear as to the location of any required services such as a pad-mount transformer and other services including fire boosters along the street frontage. Clarify whether any such services are required and where they are, demonstrate their location on amended proposal plans.

RESPONSE

At this stage, no pad-mount transformer or fire booster has been identified as required at the Barrett Street frontage. Required service connections are expected to be accommodated within the development without compromising frontage landscaping, access or sightlines. Final service authority requirements, including any transformer or fire service infrastructure, can be confirmed through detailed design and conditioned if required.

Item 19 (Council Item 15) – Internal Elevations

Elevations viewing the proposal from within the driveway have not been provided and these must be submitted for Council's assessment and to understand the overall appearance of the development.

RESPONSE

The amended Proposal Plans Rev H include driveway east and west elevations, together with side and boundary elevations, illustrating the appearance of the development from within the internal driveway corridor. The civil sections further demonstrate the relationship between building pads, driveway levels and adjoining ground levels.

I trust this information is sufficient to address the issues raised in Council's correspondence. This response is provided as a full response under the *Planning Act 2016*, and it is noted that the application now moves to the Public Notification Part of the development assessment process, as per the Development Assessment Rules.

Should you have any queries regarding the application, please do not hesitate to contact me on 3480 5066.

Yours faithfully,



Matt Whalan
Senior Town Planner
IB Town Planning

Enclosures:

- Barrett Street (80) - Information Response - DA Forms.pdf
 - Barrett Street (80) - Information Response - Proposal Plans – Rev H.pdf
 - Barrett Street (80) - Information Response - Civil Plans.pdf
 - Barrett Street (80) - Information Response - Landscape Plan.pdf
 - Barrett Street (80) - Information Response - Flood and Stormwater Report.pdf
 - Barrett Street (80) - Information Response - Traffic Report.pdf
 - Barrett Street (80) - Information Response - Arborist Report.pdf
 - Barrett Street (80) - Information Response - Bushfire Management Plan.pdf
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