urban strategies

13 March 2026

Chief Executive Officer
Brisbane City Council
GPO Box 1434
BRISBANE QLD 4001

Via Email: dalodgement@brisbane.qld.gov.au

Council Reference: A006904370
Attention: Kayal Chandrasekar

Dear Kayal,

RE: Response to Information Request – Minor Change to Material Change of Use for a Multiple Dwelling at 3 - 9 Byron Street, Bulimba

We write on behalf of our client, 3 Byron St Pty Ltd, in response to Council's 17 February 2026 Information Request regarding development at 3 - 9 Byron Street, Bulimba.

This letter and attachments are a formal response to Council's Information Request. Pursuant to Part 3 Section 13.2 (a) of the Development Assessment Rules, the applicant elects to provide all of the information requested.

This written response is accompanied by:

- Amended Architectural Plans prepared by MODE;
- Amended Landscape Concept Plan prepared by CUSP;
- Waste Management Response Letter prepared by ITE Consulting;
- Civil Engineer Advice Letter prepared by Morgan Consulting Engineers;
- Fire Engineer Advice Note prepared by Spectra Fire Engineers; and
- Irrigation Strategy Report Prepared by IDA.

This letter sets out the applicant's response to each item. The numbering corresponds to the numbering in Council's 17 February 2026 request.

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Planning Assessment

Flooding

1. The development's flood immunity is considered to be of utmost importance, however the submitted plans does not show the RLs for basement entry, habitable/ non-habitable floors and essential services, consistent with the approved plans (Council ref: A006702114).
a. Provide amended plans in accordance with PO3 of the Flood overlay code that show all details on plans to demonstrate the development will be compatible with the flood hazard in the relevant flood planning area.

Response

Please refer to the Amended Architectural Plans prepared by MODE, which demonstrates all RLs at ground level. Of note, the bin storage room and ramp sit level at RL3.4m AHD.

Landscaping and Street Interface

2. The proposal seeks a change to include a significant portion of the frontage to be dedicated to services due to the inclusion of a pad mount transformer and relocation of other services. The amendments significantly impact the streetscape interface on Byron Street, thereby diminishing casual surveillance, interaction with the street, and changing the balance of landscape to built form outcomes. This does not comply with PO3, PO4, PO5, PO6, PO8 of the Multiple dwelling code.
a. Submit amended design to relocate the water meters, booster, and fire services cupboard parallel with the driveway or inside of the lobby area. The design of the assembly to also consider higher quality architectural outcome using variation in materials, finishes and detailing.
b. Provide fencing to the terrace fronting Byron Street which is 50% permeable and incorporating landscaping to manage privacy and transition from the street to the terrace, facilitating casual surveillance.
c. Submit amended plans showing minimum width for the proposed concrete slab for the pad mount transformer to allow growth of climbing plants on the battened enclosure, minimising the visual impact on the street.

3. The proposal does not demonstrate safe and convenient access for landscape maintenance of trees (including access for pruning tree branches, replenishing soils, mulch and underplanting as required). Submit amended plans to comply with AO29.2/PO29 of the Multiple dwelling code.

Response

<u>Item 2 a and c</u>

Please refer to the Civil Engineer Advice Letter prepared by Morgan Consulting Engineers and the Fire Engineer Advice Note prepared by Spectra Fire Engineers.

Due to the current Australian Standards for location of Fire Services, specifically AS2419.1:2021 Clause 7.3.3(d)(i), the booster and fire cabinets are required to achieve a 10m separation from high voltage equipment. As such, achieving a 10 m separation from the PMT along the driveway would require the booster to be located within the site. However, AS 2419.1:2021 Clause 7.36.3(a) stipulates that the booster cabinet must be located no more than 10 m from a hardstand area. In this instance, the hardstand is the street; therefore, the booster must be positioned within 10 m of the street frontage. Any location along the driveway that achieves a separation greater than 10 m from the PMT would consequently be situated more than 10 m from the hardstand.

Furthermore, Clause 7.36.3(c) of AS 2419.1:2021 requires that the booster outlets be oriented towards the hardstand. Accordingly, the booster cabinet must face the street and cannot be oriented toward the driveway.

During design development for the proposed development, it has been established that the existing water service and meter location is constrained to a position within the development frontage. There is no water reticulation main within the Apollo Road frontage, meaning the development must be serviced via the Byron Street reticulation main.

The proposed water service for the development must enter at a location that does not conflict with the pad mount transformer, the access driveway, the bus stop facility and existing sewer manhole, resulting in a narrow allocation along the frontage for the water service and meter to be located.

Given these requirements and the existing site constraints, Urban Utilities require the water meter location to be positioned along the Byron Street frontage, as shown in the design, providing a compliant design against their requirements.

We also note the requirement for cupboards to be offset from the driveway to ensure traffic sight lines are provided in accordance with Australian Standards.

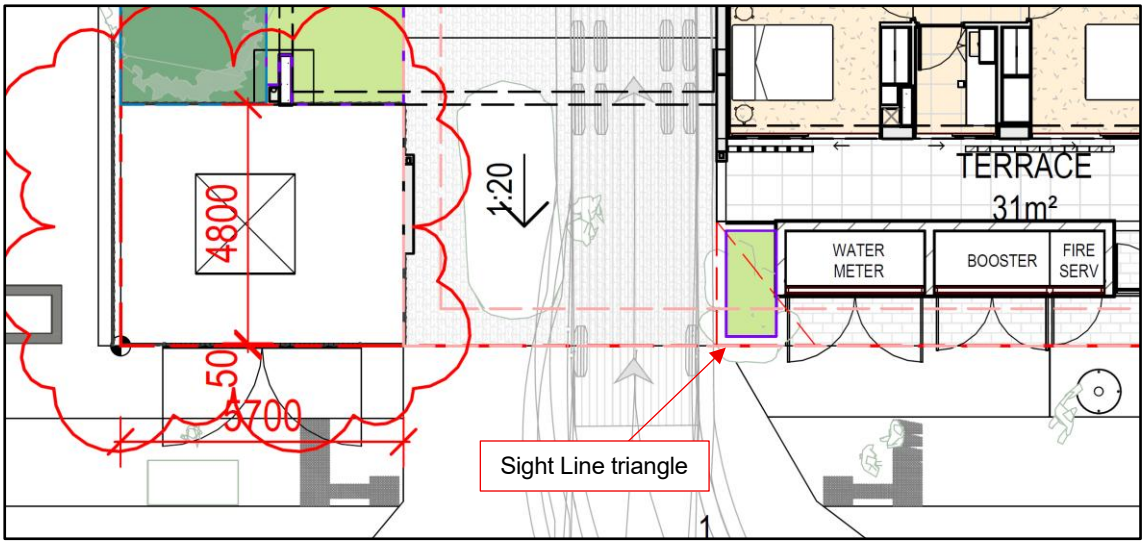

Figure 1: Proposed Driveway Sight Line (Source: MODE)

Notwithstanding, a 1.8m fence has been proposed for the PMT, of similar materials and colour to the existing façade, to screen it from public view and improve amenity. There is insufficient space for climbing plants around the PMT. Further, the water meter, booster and fire cabinets have also been redesigned using materials that blend into the existing façade, to improve streetscape amenity (Figure 2).

Figure 2: Development Render – Byron Street Frontage (Source: MODE)

Item 2b

As demonstrated in Figure 2 and 3, additional planting and transparent fence has been added to the ground level terrace to improve streetscape amenity and encourage casual surveillance.

Figure 3: Development Render – View from Street Corner (Source: MODE)

Item 3

Section 11 of the Landscape Concept Plan details the maintenance of planting throughout the development. This provisionally endorsed maintenance strategy in the original approval has not been altered because of the Minor Change application.

The proposed changes still allow for access around the building at ground level and upper-level planters (Figure 4). Plant species have been chosen for their longevity and low maintenance characteristics. Any planters not located at a floor level will be accessed using ladders or clip on rope systems to facade.

Figure 4: Maintenance Access Routes (Source: CUSP)

Communal Open Space

4. The proposed changes to the communal open space at Level 4 diminish the landscape offering which doesn't go towards balancing the shade offering or provide a pleasant outlook as required by PO8 and AO30.1/ PO30 of the Multiple dwelling code. Submit amended plans showing a balance of built and natural shade to the communal open space to provide future residents with a functional and useable space.

5. Submit amended Level 4 floor plans showing soft landscaping along the western edge at the interface with the adjoining development, consistent with the approved plans (Council ref: A006702114), to comply with PO8, PO28 and AO31.3/PO31 and of the Multiple dwelling code.

Response

We note that the approved communal space was deemed to comply with PO30, which states:

"Development provides communal space that must be designed to provide:

a) residents with passive and active recreation opportunities;
b) a pleasant outlook for residents and maximise opportunities for shared views or access to viewing points;
c) opportunity for a range of uses and flexible use."

The Performance Outcome does not specify any minimum requirement for landscaping or shading in communal areas. In this instance, the change application proposed an increase in the total rooftop pool area to maximise both passive and active recreation opportunities, specifically via the pool and BBQ area.

Notwithstanding, in response to item 4, the applicant has improved the landscaping outcome for the communal area and increased the total Level 4 landscaping to 56.5m^2. Specifically, the following amendments have been made, and are shown in Figure 4:

- provision of planter along western boundary providing screening and landscaping;
- increase in depth of southern planter to 1200mm to accommodate a shade tree for the seating area.
- Provision of parting wall, with a large opening, between seating area and pool to improve shading and privacy, forming a more private 'dining terrace' in order to promote a range of uses. This creates flexibility of use by residents and maintains shared views.
- Pool size reduced to add landscaping.
- Additional landscape planters added to communal area entrance.

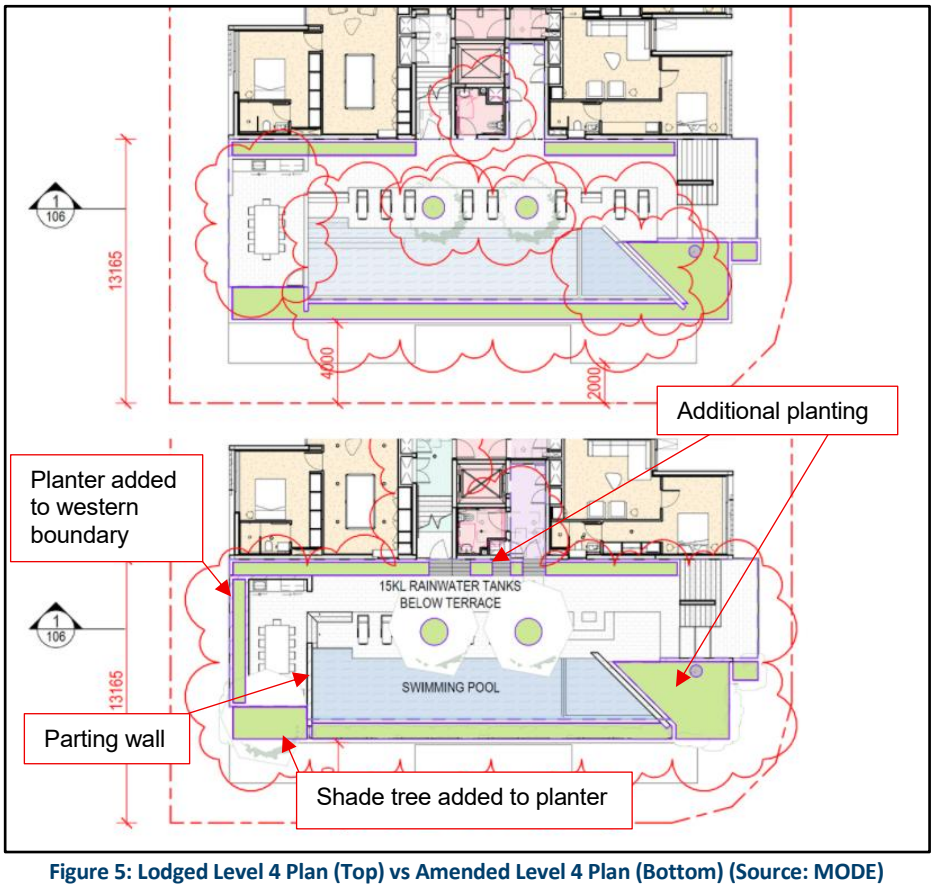

Figure 5: Lodged Level 4 Plan (Top) vs Amended Level 4 Plan (Bottom) (Source: MODE)

Irrigation Strategy

6. The proposed Landscape concept plans show 15KL rainwater tanks at Level 4 in place of 30KL tanks previously approved. The 30KL rainwater tank was less than the desirable capacity and any reduction is not able to be supported. The preliminary irrigation estimate is not prepared by a suitably qualified professional and does not concur with the Irrigation Water Usage, Catchment & Irrigation Strategy, prepared by Irrigation Design Australia and received on 26 May 2025, as part of the original approval (Council ref: A006702114). Provide amended plans showing 30KL rainwater tank capacity consistent with the approved plans.

Response

The approved plans illustrated the provision of 30,000L tanks however, this was an error. The amended Architectural Plans, prepared by MODE, show 15,000L tanks on Level 4, as per the recommendations within the attached Irrigation Strategy Report. Further, the Preliminary Irrigation Study within the Landscape Concept Design has been removed.

As part of the original approval, an Irrigation Strategy Report was prepared by Irrigation Design Australia that provided recommendations for the provision of either 10,000L or 15,000L storage tanks. Table 5 of the Landscape Design Policy only considers potential harvest volumes however the Irrigation Strategy Report also takes into account irrigation water requirements, as tank size should have regard to the total roof area.

Allowing that “Average Rainfall” occurs then 15,000L of storage would hold each season’s highest catchment volumes.

Further to this, Council has not demonstrated the calculations that concluded a 30KL tank is required. Should Tank size selection be larger than 15KL there will be periods where the tank will require top up from an external supply otherwise it will have only small residual water retained as storage this can affect the stability of the Tank.

Waste Management

7. The changed proposal has removed the residents' access to the Bin room, therefore requiring residents to go down to the basement and up the stairs to dispose of their recycling. Provide amended plans in accordance with AO32/PO32 of the Multiple dwelling code and AO8.1 & AO8.2/PO8 of the Infrastructure design code to show the following:
a. A diverter to provide convenient disposal of recycling for residents and to achieve source separation between general refuse and comingled recycling
b. Include details of the refuse storage room including chute and the dimensions of the bin room, gradients, aisle width and reference to the speed bump

Response

Item 7a

Please refer to the Waste Management Response Letter prepared by ITE Consulting. A chute diverter has been provided within the bin room to separate general waste and recycling waste. Ground level residents will utilise the bin chutes on Level 2 to dispose of general and recycling waste, which will be separated by the diverter (Figure 6).

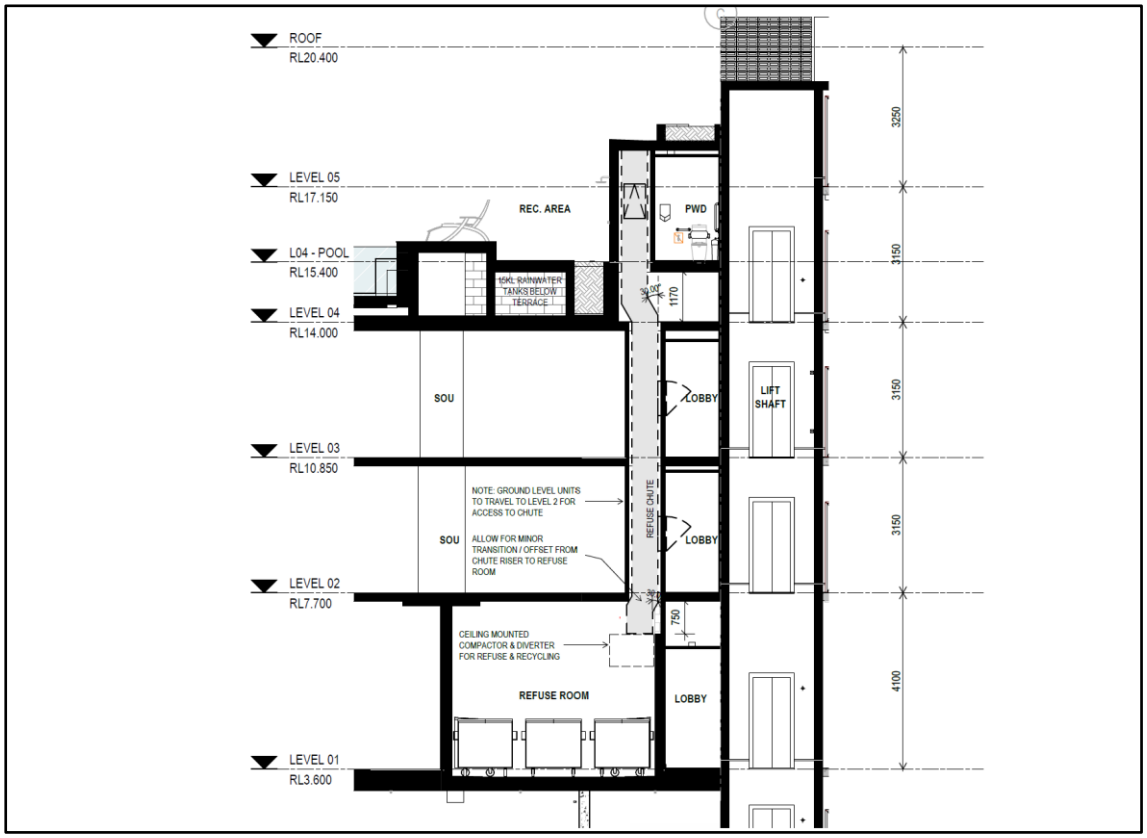

Figure 6: Chute Section (Source: MODE)

The removal of the access door (from the approved plans) was warranted due to the requirement for better fire separation. Specifically, this was proposed to promote a safer

fire escape passageway through the main lobby, past the refuse room, which was considered a fire source risk. This was initially highlighted by the Queensland Fire Department.

Item 7b

As demonstrated in Figure 7 below, the ground level plan has illustrated the chute diverter, dimensions, gradient and speed bump on the ground level plan. Notably, the bin room sits at RL3.4m AHD, which is level with the driveway and consistent with the approval.

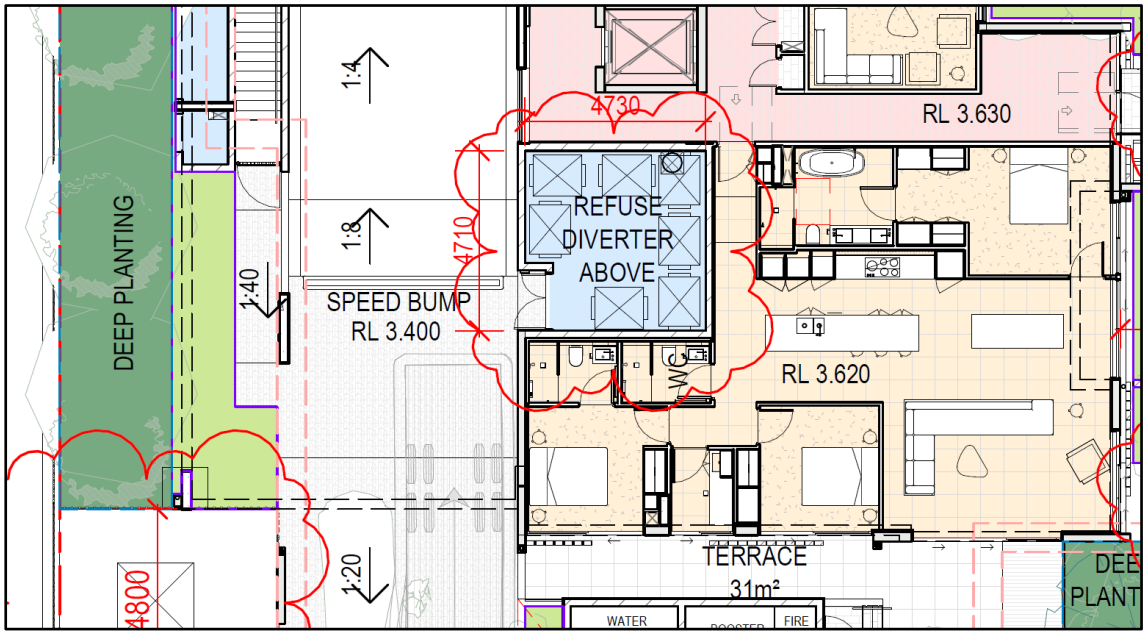

Figure 7: Amended Ground Floor Plan (Source: MODE)

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We trust the above and accompanying information suitably addresses the comments of the Council however should further clarification or information be required please contact our office.

Yours faithfully

URBAN STRATEGIES PTY LTD

Joshua Daley
SENIOR TOWN PLANNER