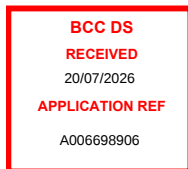


Our ref: 12152
Council ref: A006698906

20 July 2026



Attention: Rhea Connolly

Brisbane City Council
GPO Box 1434
Brisbane QLD 4000

Via email: dsplanningsupport@brisbane.qld.gov.au

Dear Rhea,

**RE: RESPONSE TO INFORMATION REQUEST - A006698906
SECTION 13.2 OF THE DEVELOPMENT ASSESSMENT RULES
341 BECKETT ROAD, BRIDGEMAN DOWNS QUEENSLAND 4035**

We act on behalf of Steve Brown Constructions Pty Ltd and Mei Wah Wong, the Applicant in relation to a Development Application lodged with Brisbane City Council under the *Planning Act 2016* (the Planning Act) over the above land seeking:

- Development Permit for Reconfiguring a Lot (2 lots into 22 lots and new road)

On 15 April 2025 we received an Information Request from Brisbane City Council under Part 3 of the *Development Assessment Rules* (DA Rules). In accordance with Section 13.2 (a) of the DA Rules, we now provide a response to all of the information requested.

In support of our response, we provide the following attachments:

- Attachment A** Amended Plan of Subdivision, prepared by Saunders Havill
- Attachment B** Structure Plan, prepared by Saunders Havill
- Attachment C** Civil Engineering Response, prepared by Stantec
- Attachment D** Tree Impact Plan, prepared by Saunders Havill

A response to each item of Council's Information Request is included overleaf. Of note is that concurrence agency conditions have been received (SARA Ref: 2504-45466 SRA) based on the layout as submitted with the application. A change to this concurrence agency response will occur prior to decision by Brisbane City Council.

Key changes to the submission have been made in response to Council's Information Request, these include:

- Total loss of 1 lot overall, resulting in a 2 into 21 lot subdivision;



- Increase in Environmental Protection Zone (EPZ) widths along the Beckett Road frontage from 20m to 25m. This has resulted in retention of significant trees within this zone and provides a consistent 'green' zone along Beckett Road that maintains and enhances the street amenity;
- Extension of the EPZ along the northern boundary, resulting in the removal of 1 allotment;
- Minor amendments to internal road design as a result of earthworks, suitable building pads and refuse vehicle turnarounds;
- Lots 9-14 orientated east-west and utilising a shared driveway arrangement. This is to manage the slope in this area of the site and not have to rely on battering or large retaining structures. Smaller retaining structures occur on lot boundaries without impacting amenity of each lot;
- Decrease in pedestrian link width between lots 4 and 5 from 10m to 5m to increase environmental protection zone.

Below is a comparison of the submitted plan and the current proposal plan.

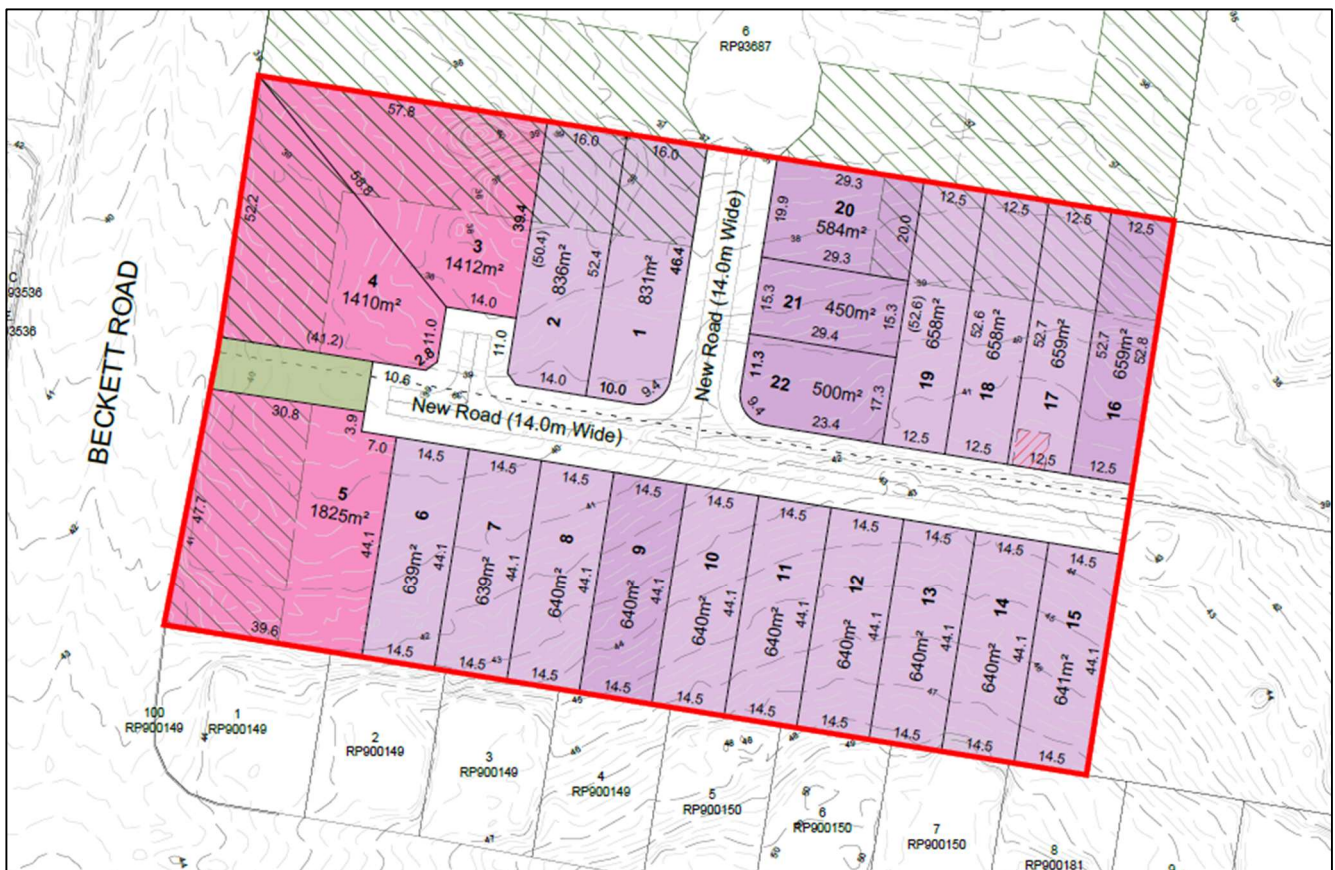


Figure 1: Original Submitted Plan



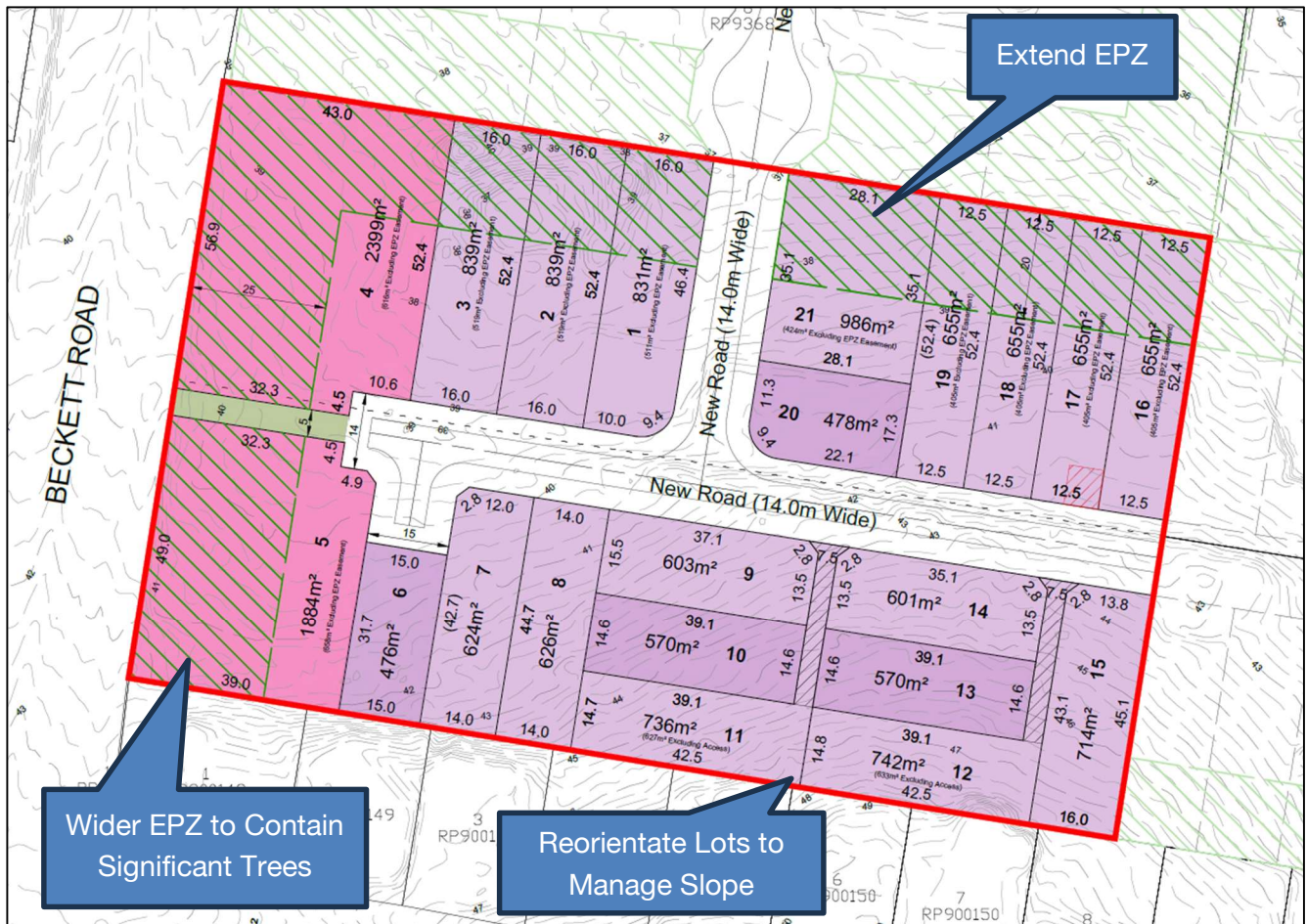


Figure 2: Current Proposal Plan

Importantly for this proposal, is integrating with the adjoining development approvals and applications and the environmental outcomes in achieving fauna corridors. The intent of the proposal is to provide larger residential lots in response to the physical constraints of the site and creating a functional and integrated community. Below is a structure plan of the subject area and how environmental values are achieved with retention of significant vegetation and linkages to Cabbage Tree Creek to the east.



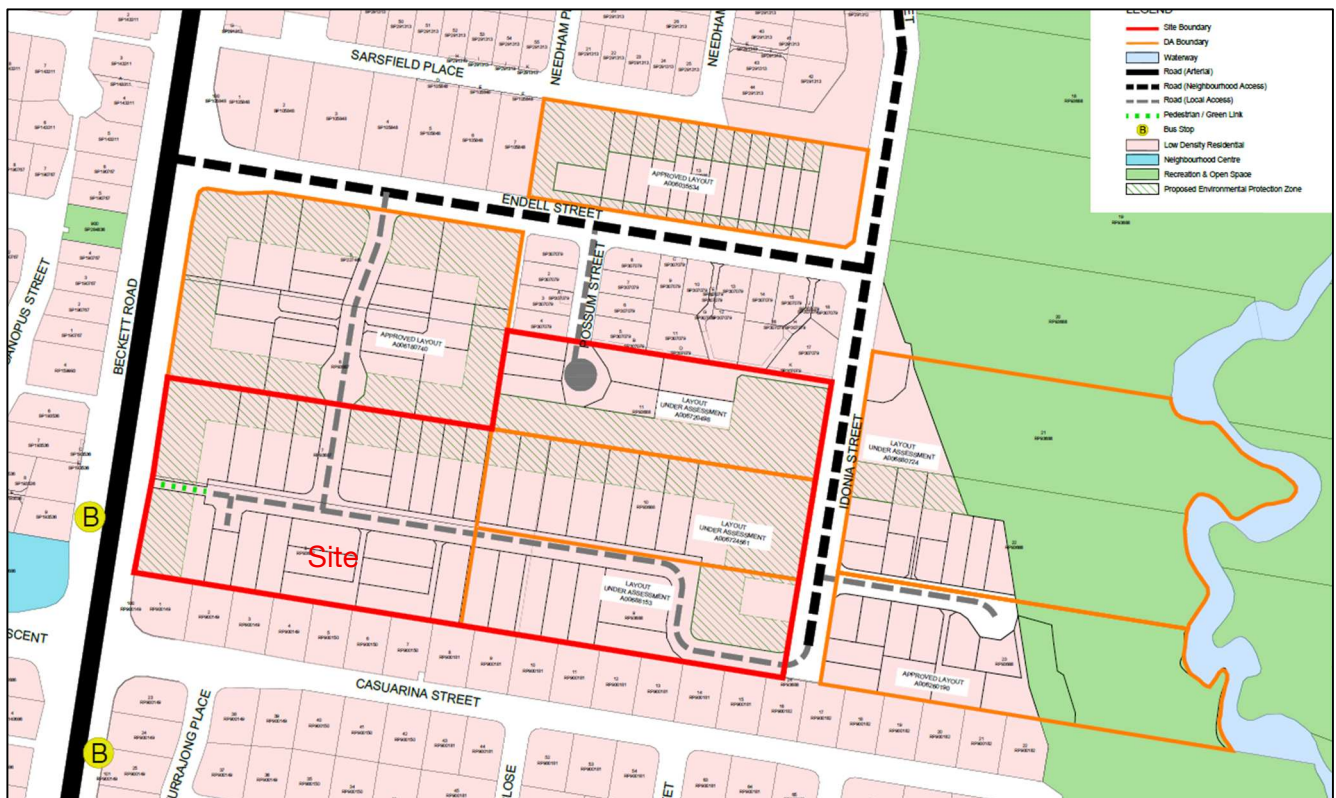


Figure 3: Structure Plan

This outcome has been accepted by the State Assessment and Referral Agency (koala matters) with Concurrence Agency Conditions provided for all approvals/applications in the area.

A response to each item of Council's Information Request is included below.

Response to Information Request

Orderly Development

- 1) Council is concerned that the proposal is out-of-sequence as it relies upon the road corridor and stormwater infrastructure to be provided by 357 and 365 Beckett Road (Lot 6 on RP 93687 and Lot 5 on SP227448) or 113 and 117 Idonia Street (Lot 10 on RP93688 and Lot 9 on RP93688) for access to all lots. Whilst Council is currently assessing development applications for 113 and 117 Idonia Street, and notwithstanding there is a current approval over 357 and 365 Beckett Road, there is no certainty that these developments will ultimately go ahead. This issue will require further interrogation and understanding. More specific issues with respect to sequencing is detailed below.

Response: The Applicant has engaged with Council officers regarding the sequencing of development to confirm that the development proposal is a logical infill development. Where in similar situations the sequence of events for infill development includes relying on road access and infrastructure (water, sewer and stormwater) in order to deliver the development. This development application would be in the same situation as most, relying on the northern



development (A006180740) before commencing works. At a prelodgement meeting held with Council this position was agreed upon (in writing) to progress this application on the above basis. To support the above an updated structure plan labelled with each approval and application reference is attached herein to confirm how each development interlinks with each other. Refer to **Attachment B**.

The applicant will accept a condition that the development to the north (A006180740) must be completed prior to development occurring. Suggested wording is as follows:

'Prior to lodgement of any related application for the development, the road over adjoining development (A006180740) along the northern boundary of the site has been constructed and works accepted 'on maintenance'.'

Road Design

2) *The proposed road design is generally acceptable. However, there is uncertainty in relation to the proposed road grades and expected alignment with future road connections to the north and east.*

a) *Provide preliminary road design plans, endorsed by an RPEQ in accordance with PO12 of the Subdivision code, showing cross sections as well as longitudinal grades. The design is also to consider adjacent developments and future road connections, clearly showing levels and sections to ensure transition between adjacent sites can be achieved.*

Response: Stantec has prepared amended engineering plans which include longitudinal long sections for the adjacent properties (north and east). Refer to Stantec drawing CI-DA-400-L01 in **Attachment C**. The roadworks have been designed to align with the adjoining development applications A006724561 and A006688153.

Filling and Excavation

3) *The development site falls from the southeastern corner of the site to the south and south west. There is significant fall across the site from contour 47 to 39 at its lowest point.*

In an effort to achieve level pads substantial cut is proposed for lots 6 to 15, in some cases in excess of 3m, with a combination of batters and retaining walls. The proposed batters exceed the maximum accepted 1 in 4 grade.

For Lots 16 to 19 split pad levels are proposed with the explanation that future dwellings are expected to be constructed as "split" level dwellings. There are no



dwelling designs attached to these specific lots as part of this application. As such, the proposed Lots 16 to 19 do not meet earthworks requirements of PO2 of the Subdivision code.

It is also noted that retaining proposed in fill between lots 19, 21 and 22 exceeds the maximum 1m height at the property boundary.

a) *Submit a revised earthworks plan, endorsed by an RPEQ including the following:*

- i. All retaining structures in fill at property boundaries (includes new lots) at a maximum 1m height and all further terracing from the 1m high boundary retaining wall is 1 vertical unit:1 horizontal unit. Where a performance outcome is sought it is to be clearly identified and justified by an RPEQ.*
- ii. All Batters no greater than 1 in 4 grades*
- iii. Additional sections from Lot 15 and Lot 16 to the east taking into consideration proposed developments at 117 and 113 Idonia Street. All new retaining and existing levels are to be shown.*
- iv. Lots 16 to 19 earthworks in accordance with PO2 of the Subdivision code. Alternatively, provide specific dwelling designs that are to be constructed and delivered along with the specified lots.*
- v. Cut/fill legend that accurately reflects colours shown on plan.*

Response: A response to Item 3 has been provided by Stantec and correlate with the engineering plans in **Attachment C** below:

- i) Retaining walls along road frontages have been maintained at a 1m height, however, due to the existing grade of the site multiple retaining walls are required to exceed 1m in height to avoid significant impact on development. It is noted that single tier retaining walls between proposed allotments have been restricted to 2.0m in height, with multi-tier retaining walls being restricted to 1.5m in height within a single tier.

Where retaining walls exceed 1.0m, either as a single tier or multi-tier wall, the allotments are configured so that the retaining walls are typically positioned on the Southern or Eastern boundary of the lower allotment. This has been done to reduce impacts to the amenity and perceived imposition on the lower allotment resulting from the retaining walls.

Additionally, retaining walls along the Western boundary of Lots 12-15 are located adjacent to driveways which provide shared access to Lots 9-11 and 12-14. This further reduces the impact of these retaining walls on the lower allotments.



- ii) Batters are generally 1:4 to 1:6 except to Lots 1-4 and 16-19 where the mid-block batters are maintained at 1in3 as part of the proposed works as an increase to 1in4 would impact the proposed environmental protection zone.
- iii) Refer to enclosed sections noting that these are to the existing levels of the adjacent properties. Further coordination of levels and interfaces between developments will be required as part of OPW phases.
- iv) Refer to enclosed indicative dwelling design plans for sites 16-19
- v) Refer to enclosed civil engineering plans

Stormwater

- 4) *The Stormwater Management Technical Memo submitted with the application acknowledges the existing overland flow path however, provides little comment on how proposed earthworks on Lots 1 to 4 and filling of the existing dam will impact on the existing overland flowpath that flows onto the neighbouring property to the north.*
- a) *Provide an updated stormwater report addressing any impacts on the existing overland flow path resulting from proposed earthworks on site. The report is also to identify and show the extent of the easement over the overland flow path. The report must be endorsed by a RPEQ.*

Response: The existing overland flow path is generally retained with stormwater flows discharging, from Beckett Road, through Lot 5 and into the proposed road development road network towards Endell Street to the North. A bund has been introduced along the Northern boundary to ensure that any addition flows from the Lot 4 portion of Beckett Road and from Lots 1-3 are directed towards the proposed roadway which effectively maintains the existing overland flow path. An updated Stormwater Technical Memo has not been provided as the proposed outcomes are consistent with the memo dated 17 January 2025.

Refer to Conceptual Services coordination plan CI-DA-080-P01.

Lawful Point of Discharge

- 5) *The proposed development is dependent on approved development A006180740 to the north to be constructed and accepted on maintenance for the proposed design to effectively achieve a lawful point of discharge (LPD). Should the proposed development to the north not be enacted, this development will need to identify a LPD.*



- a) Provide further clarification with respect to how the site can achieve LPD in accordance with PO3 of the Stormwater code.*

Response: As discussed above, the proposal is dependent upon the adjoining development approval to the north. This can be appropriately conditioned.

Stormwater Quality Treatment

- 6) The proposed treatment train, comprising entirely of tree pits and bio retention pods would not be effective in servicing such a large development and is not supported. The proposal introduces potential obstructions to lot access. The proposed development has not demonstrated water quality can be achieved in accordance with PO1 and PO6 of the Stormwater code.*

- a) Submit a revised stormwater report and water quality treatment with a bio retention basin within future Council land. The report is required to be endorsed by a RPEQ.*

Response: No changes have been made to the proposed usage of stormwater quality devices for the project with a combination of bio-pods and tree pits remaining the preferred treatment outcome. It is noted that it is not considered a good outcome for a traditional basin to be situated above residential properties which would be required in this instance due to the requirement to achieve the road connection through the north.

Additionally, the proposed developments on adjacent allotments (e.g. 365 Beckett Road (A006180740), 113 Idonia St (A006724561), 117 Idonia St (A006688153), similarly have stormwater quality treated via the usage of tree pits and/or a combination of bio-pods and tree pits with developments being similar in size for proposed allotments and having similar constraints. An updated Stormwater Technical Memo has not been provided as the proposed outcomes are consistent with the memo dated 17 January 2025.

Utilities

- 7) It appears that the proposed development is dependent on surrounding developments to achieve serviceability. This also appears to apply to other services such as electricity, telecommunications, water and sewerage.*

- a) Provide a SAN notice from Urban Utilities to demonstrate that the development can be provided with water and sewerage infrastructure in accordance with PO4 of the Subdivision code.*

Response: Serviceability will be provided by continuation of infrastructure in adjacent developments, in the same way as road access and stormwater. Engagement with the various utility providers will occur post development approval.



The proposal can be appropriately conditioned so as to occur after the development to north has been completed.

Refuse Collection Vehicle Turnaround and Road Pavement

- 8) *It is noted that a temporary turnaround facility is proposed for Lot 17 separate to the lot's vehicle crossover however, the proposed gradient of 1:9.7 as shown in Section C on drawing number CI-DA-103-C01 (Rev A, 20/12/24 by Stantec) exceeds the maximum 1:20 allowable for refuse collection vehicle (RCV) manoeuvring.*

This is not safe or functional and does not comply with AO4.1 and AO9 of the Subdivision code and AO8.1 of the Infrastructure design code. Further, the road pavement and associated kerb and channel appears to stop short of the eastern boundary preventing the RCV from undertaking safe manoeuvring and refuse collection for proposed Lot 15.

Additionally, it is noted that the Concept Plan by Saunders Havill Group (drawing number 12152 P 03, Rev C, 22/11/24) has not demonstrated vehicle crossovers for the proposed lots as shown on the drawings by Stantec which is required to undertake further assessment and to ensure consistency across all drawings.

- a) *Submit amended plans that demonstrate:*
- i. *A maximum 1:20 gradient for all RCV manoeuvring areas including turnaround facilities;*
 - ii. *Road pavement extended to the eastern boundary;*
 - iii. *Vehicle crossovers for proposed lots 3, 4, 5, 6 and 17 consistent with those shown on civil drawings by Stantec.*
- b) *Utilising amended plans, provide RPEQ certified side loading RCV swept path analysis that demonstrates safe and efficient manoeuvring and that the RCV's side arm can service the frontage of each lot (Lot 3 excepted). Refer to Refuse planning scheme policy Table 3 for side loading RCV specifications.*

Response: A response to each item above is provided below:

- a) Refer to civil engineering plans for details for updated drawings containing the requested information.
- i. Gradient to temporary refuse collection manoeuvring driveway is circa 2.5% noting that refuse collection driveway will be subject to OPW design.
 - ii. Road pavement has been extended to approximately 1.0m from Eastern boundary to allow for constructability of road.
 - iii. Refer to SHG plans noting changes in development configuration and layout.



- b) Refer to civil engineering plans for revised layout, noting that proposed driveway positions for Lot 15 are circa 10m from the proposed Eastern boundary which enable collection to the left hand side of the RCV while the Western end of Road 2 is a standard BCC 'T' head.

Bin Pads

- 9) *Concrete bin pads have been demonstrated on civil drawings by Stantec (drawing numbers CI-DA-080-P01 and CI-DA-400-P01). These are not in accordance with the requirements in City Plan 2014 and are therefore, not required or supported.*
- a) *Submit amended plans that remove all concrete bin pads and references to "indicative bin pads".*

Response: All bin pads have been removed. Refer to enclosed civil engineering plans **Attachment C**. Lot 6 may require a bin presentation area adjacent to lots 5 or 7, this can be conditioned appropriately.

Ecological Values

The proposed development seeks to reconfigure two (2) lots into 22 residential lots and a new road, with privately-owned minimum 20m deep Environmental Protection Zones (EPZs) along the western and northern boundaries. The proposal is within the High Ecological Significance (HES) sub-category of the Biodiversity areas overlay, triggering assessment against Section C of the Biodiversity areas overlay code.

Extensive encroachment into mapped HES areas is proposed, and the current development layout will result in the following ecological values being impacted/lost:

- *habitat which links the site and adjoining properties to Cabbage Tree Creek providing wildlife movement function*
- *habitat for a variety of fauna species, including significant koalas, flying-fox, gliders, powerful owl, grey goshawk, echidna (all of which are known to occur in this area)*
- *potential habitat for significant frog species*
- *a significant number of native trees including locally significant flora species (i.e. *Corymbia intermedia*, *Eucalyptus major*, *E. microcorys*, *E. tereticornis*, *E. racemosa*, *E. tindaliae*, *Lophostemon confertus*) and 124 koala habitat trees*

The proposed intrusion into mapped areas, and impact to in-situ and strategic ecological values of the site does not demonstrate the protection, conservation and restoration of



ecological values as required by PO4 of the Biodiversity areas overlay code and does not comply with the PO19 of the Subdivision code, which requires the retention of significant vegetation. Refer to the Vegetation planning scheme policy for the definition of 'significant vegetation'.

In addition to the above, the proposal does not demonstrate that ecological values are being preserved from development as required by the McDowall-Bridgeman Downs neighbourhood plan. The proposed development extent is considered inappropriate to maintain its natural and ecological significance (OO3b), and development in the Emerging community zone in a potential development area must contain larger lots, retain existing vegetation and minimise development in vegetated areas (OO3f(i)).

The following changes are required:

- a) A reduction in the number of lots and rearrangement of proposed lot boundaries to maximise vegetation retention and strengthen ecological corridors. Vegetation must be contained in large lots with BLEs adequately set back from vegetation and outside of the Tree Protection Zones (TPZs) of trees to be retained (considering existing vegetation and mature vegetation established as part of ecological restoration efforts).
- b) Retention of additional areas of vegetation including the following:
 - i. Proposed Lots 15 and 16 must be amalgamated with Lots 14 and 17 respectively to provide a minimum 15m wide EPZ along the entirety of the eastern boundary which retains and restores ecological values and connectivity to adjoining properties.
 - ii. Proposed Lot 20 must be amalgamated with a surrounding lot and provided as an EPZ to strengthen ecological connectivity, and retain and restore ecological values.
 - iii. The existing dam and all fringing vegetation within the EPZ of proposed Lots 2 and 3 must be retained and restored, and wholly contained within the EPZ of one (1) lot.
 - iv. The highest value koala habitat area has been identified as the north-eastern corner of the site, and additional koala habitat trees must be retained within the EPZ at this location.
 - v. Additional retention of vegetation within areas of mapped HES must be attempted wherever possible (i.e. south-west corner of site).
- c) The number of lot owners of EPZ areas must be minimised to reduce the amount of lot severance that is created and maximise cohesive restoration outcomes.



The pedestrian path through to Beckett Road is to be reduced in width and located to minimise impacts to vegetation, particularly Trees 1 and 394.

Provide a revised Tree Survey Plan based on the lot reduction and resultant changes in required earthworks. Amended lot layout, all civil works and services must be included onto the Tree Survey Plan, along with Tree ID numbers and HES overlay. If works encroach into the TPZs of any trees identified to be retained, a report from a qualified arborist (minimum AQF level 5 Arboriculture) is required to demonstrate no negative impacts on the long-term health of the trees.

Provide a Concept Rehabilitation Plan. Development must enhance biodiversity, native habitat and fauna movement. This plan is to be in the form of scaled plans and supporting documentation that includes at least the following information:

- i) Description of proposed rehabilitation, including earthworks, methods, objectives.*
- ii) Details of the proposed rehabilitation schedule, including staging, plant species names, stock size, quantities, densities, locations.*
- iii) A detailed 24 month maintenance program for all rehabilitation works.*
- iv) Stabilisation methods for all areas of exposed soil surface.*
- v) Specification notes on weed treatment and management, planting methods, mulching and soil preparation.*

11) It is recognised incidental fauna observations and one (1) koala SAT survey was undertaken to identify the presence or likely presence of fauna species, however based on the information provided, insufficient targeted fauna surveys were completed.

- a) Provide an updated Ecological Assessment Report which demonstrates fauna surveys have been undertaken across the entirety of the site in accordance with the Biodiversity PSP, State species-specific survey guidelines and other widely-accepted methodology (i.e. koala SAT survey as per Phillips & Callaghan 2011) and includes targeted fauna survey results.*

12) The proposed removal of ecological values is likely to result in a significant residual impact and therefore require environmental offsets in accordance with PO9 of the Biodiversity areas overlay code.

- a) Provide an Offset Delivery Strategy that confirms the total impact area to be offset (noting changes required to retention of vegetation), in accordance with PO9 of the Biodiversity areas overlay code and the Offsets PSP.*
- i) Provide a plan clearly identifying the existing HES Biodiversity areas overlay, together with the extent of development footprint impacting upon mapped areas (e.g. development areas, roads, building envelopes, service alignments and access for construction works) and any proposed reductions of mapped area to determine the area of impact. These may*



include existing dwelling and curtilage, lawns, landscape gardens, cleared areas and areas dominated by exotic weeds (vegetation is to be mapped in groups).

ii) Residual impacts must be offset using MLES3.

iii) Amendments to site layout as detailed above are to be incorporated to reduce area of impact.

iv) Restoration works are required by the Biodiversity areas overlay code.

Response: The ecological report has not been updated for the amended layout. Nonetheless the following changes are made to the plan and are considerate of the existing ecological features (mapped and ground truthed):

- Increase EPZ width to 25m along Beckett Road frontage to retain larger trees;
- Extension of the EPZ along the northern boundary.

Significant consultation has occurred with both SARA and Brisbane Council planning officers to moderate an outcome for the subject site and the area overall. This has provided a balanced outcome to achieve much needed residential development within an infill site with significant environmental values. It is considered through the provision of rehabilitated environmental protection zones, the environmental values of the area are improved add both to the amenity and biodiversity of the area.

The below structure plan provides an overall picture of how environmental corridors are being achieved, particularly north-south along Beckett Road and East-West towards Cabbage Tree Creek.



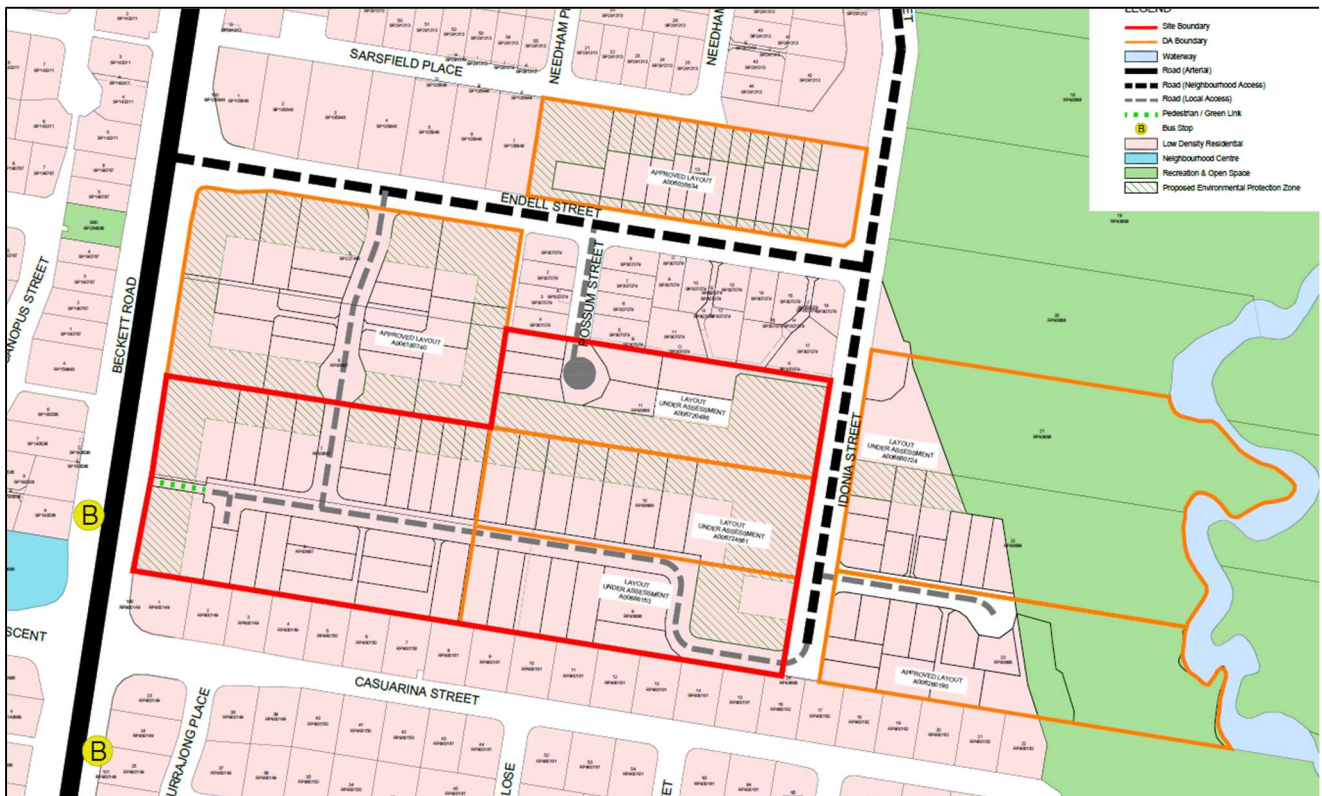


Figure 4: Structure Plan

Relating to the existing dam in the north-west corner, this is proposed to be removed. It is an undesirable outcome to retain dams on residential lots as they can be deemed a hazard to human life and cause breeding grounds for mosquitos. The EPZ in this area will be rehabilitated to a suitable natural outcome.

SARA have granted concurrence agency conditions on 17 November 2025 for this development and the surrounding applications. Those conditions will for the most part be a monetary off-set for the removal of Non-juvenile koala habitat trees within the mapped koala habitat area. To clarify, while some trees have been identified as being impacted, this is a consequence of the exempt clearing provisions. In reality any tree not impacted by earthworks and within the EPZ will be retained. See Tree Impact Plan and Schedule attached (**Attachment D**).

Appropriate conditions of approval are expected to include preparation of:

- Environmental offset;
- Vegetation Management Plan;
- Where required the preparation of an Arborist Assessment; and
- Rehabilitation Plan.



Summary

We offer this as a response to all of the information requested in Council's Information Request. As required by Section 14.1 (a) of the DA Rules, we advise that Council is to proceed with its assessment of the application.

In fulfilment of our obligations under Part 4 of the DA Rules, we will now arrange for public notification to be carried out for a period of 15 business days.

Should any clarification be required, please contact me on (07) 3251 9482 or email at andrewmclean@saundershavill.com.

Yours sincerely

Saunders Havill Group



Andrew McLean

Principal – Town Planning / Associate Partner

