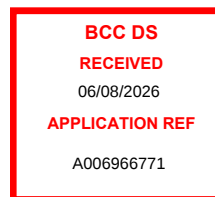


Our ref: 12270
Council ref: 397 Bracken Ridge Rd, Bracken Ridge



Saunders Havill Group Pty Ltd
ABN 24 144 972 949

6 August 2026

Attention: Dominic Hudson
Brisbane City Council
GPO Box 1434
Brisbane QLD 4000

Via email: Dominic.Hudson@brisbane.qld.gov.au

Dear Dominic,

RE: RESPONSE TO INFORMATION REQUEST
SECTION 13.2 OF THE DEVELOPMENT ASSESSMENT RULES
387 & 399 BRACKEN RIDGE ROAD, BRACKEN RIDGE QUEENSLAND 4017
COUNCIL REF: A006966771

We act on behalf of Hardev Property (Dev 24) Pty Ltd ATF Hardev Property (Dev 24) Unit Trust, the Applicant in relation to a Development Application lodged with Brisbane City Council under the *Planning Act 2016* (Planning Act) over the above land seeking:

- Development Permit for Reconfiguring a Lot (14 lots, new road & drainage reserve)

On 7 April 2026 we received an Information Request from Brisbane 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:

	Item	Prepared By
Appendix A.	Amended Proposal Plans	Saunders Havill
Appendix B.	Engineering Information Request Response Cover Letter, Amended Engineering Plans & Amended Serviceability Report (including Stormwater Management Plan)	B+W
Appendix C.	Department of Transport and Main Roads correspondence	



A response to each item in Council's Information Request is provided below.

Response to Information Request

Lot Size

- 1) *A previous approval (ref: A005724889) exists over the same part of the site for a subdivision into 10 lots, new road and environmental reserve and detention basin at the rear. The smallest of the approved lots was 400m².*

This application seeks to increase the number of lots to 14 and reduces many of the lot sizes to 300m² or less and proposes an average lot size of 334m². This is not compliant with Table 9.4.10.3.B. of the Subdivision code (AO1) which prescribes a minimum average lot size of 350m². The proposed lot sizes do not meet the performance outcome (PO1) of the Subdivision code, nor are they consistent with lot sizes in nearby development or the intent for Low density residential development under both the Bracken Ridge and district neighbourhood plan code and Emerging community zone code. It is noted that Lot 10 (the only standard sized lot) does not accommodate the minimum 14 x 20 lot rectangle dimension and therefore must be excluded from the calculation of average lot size as per note 2 of Table 9.4.10.3.B.

Provide amended plans increasing the size of the lots to ensure that no lots are less than 300m² and that as a minimum, an average lot size of 350m² is achieved, in accordance with the Subdivision code. Average lot size must be calculated in accordance with note 2 of Table 9.4.10.3.B.

Response: The Proposal Plans have been amended to provide lots that are a minimum of 300m² and achieve an average lot size greater than 350m², in accordance with Table 9.4.10.3.B of the Subdivision code. All residential lots are capable of accommodating the minimum rectangular dimensions prescribed by Table 9.4.10.3.B. Amended Proposal Plans are provided at Appendix A.

Fill and Excavation Code

- 2) *The entire development is proposed to be on fill. Retaining walls along the western property boundary exceed the prescribed maximum 1m height without the required terracing.*

Provide revised Earthworks plans showing a maximum 1m height retaining along the western property boundary with any additional fill or retaining to be setback from the boundary and terraced (1 vertical unit:1 horizontal unit) in accordance with Filling and Excavation code PO2/AO2.1

Response: The earthworks plans have been amended to reduce retaining wall heights along the western property boundary to a maximum of 1 metre. Any additional fill or retaining has been setback from the boundary and terraced at a minimum ratio of 1 vertical unit to 1 horizontal unit, in accordance with PO2 and AO2.1 of the Filling and Excavation code. Amended earthworks plans are provided at Appendix B.



Stormwater Code

- 3) Further information is required to adequately address the Stormwater code PO1, PO6, Section B and the Infrastructure design planning scheme policy. Provide further details as follows:
- a. The Site Based Stormwater Management Plan (SBSMP) must provide details about flows from all catchments and must allow for future residential lots (approx. 5) to discharge to Road 1 along its eastern boundary K&C from 391 Bracken Ridge Road. Note: It is not required to allow for these lots in the water quality sizing however WSUD street trees need to be used upslope of each gully on that section of Road 1.
 - b. The upslope diversion pipeline is located within the Road 1 verge and conflicts with standard service alignments and is not supported. Amend the plans to discharge the flow into the proposed road drainage and create a suitable diversion for the detention requirements allowing some flows to bypass to offset the upslope catchment flows and future lots from 391 Bracken Ridge Road.
 - c. The detention basin cannot use a freestanding retaining wall along its western boundary. Provide a minimum 2.5m wide earth bund along the western boundary and increase the basin size to suit.
 - d. The basin detention outlet is to be controlled by a pipe/orifice at base of pit, not a rectangular orifice above basin water quality extended detention depth. Amend plans accordingly.
 - e. Offset the basin filter from the Lot 12 retaining wall by providing a 1200mm wide bund at EDD level to allow for maintenance access at rear of basin and prevent short circuiting of stormwater for water quality treatment.
 - f. Demonstrate the basin can drain to existing levels, or provide a saturated filter design where levels are constrained.
 - g. Provide a sediment forebay and ensure that a high flow diversion pipeline is provided where basin inlet pipe exceeds a 450RCP (e.g. provide a high early discharge arrangement by piping flows to outlet pit hydraulic control with low flows diverted to filter via manhole).

Response: The amended Serviceability Report (including Stormwater Management Plan) and Engineering Information Request Response Cover Letter (Appendix B) addresses each of Council's stormwater matters, including catchment flows, road drainage, detention basin configuration, outlet controls, maintenance access, drainage levels, sediment management and high flow diversion arrangements.

Biodiversity

- 4) The proposed development is located within the High ecological significance strategic (HESS) sub-category of the Biodiversity areas overlay, triggering Section C of the Biodiversity areas overlay code. Section C of the code requires the retention, protection and restoration of ecological values within mapped areas. The previous development approval on the site (ref: A005724889) established an ecological corridor and the



proposal appears to result in a reduction in the total area of the corridor. There is also potential that addressing other development matters raised by either Council or the State may further impact this corridor. Any additional vegetation requiring removal since the time of the earlier approval will need to be accounted for in the total environmental offset impact area.

To support this development application, provide the following:

- a. An updated tree retention plan prepared by a suitably qualified environmental professional, encompassing the latest development design and updates to tree retention/removal. Any battering works required within the corridor as was shown in the previous approval to be shown.*
- b. A revised environmental offset impact area based on any additional vegetation removal required.*
- c. Should there be any further reductions to part of the ecological corridor as a result of addressing other items raised by either Council or the State, it may be necessary to alter the development layout to offset this reduction and increase the corridor elsewhere onsite.*

Response: As detailed in the enclosed Department of Transport and Main Roads correspondence, the Department is progressing the Gateway to Bruce Upgrade project, which affects the portion of the site currently identified for vegetation retention. TMR has advised that construction is anticipated to commence in late 2026, with vegetation clearing and boundary fencing works to follow, subject to the necessary environmental approvals. Accordingly, any clearing associated with this area is expected to be assessed and authorised through TMR's separate approval processes.

Given the extent and timing of any vegetation clearing remains dependent on TMR's detailed design and approval framework, it is submitted that further assessment of vegetation impacts associated with these works is not warranted as part of the current development application.

Notwithstanding the above, the applicant is agreeable to a condition requiring the preparation of an updated Tree Retention Plan and Environmental Offset Impact Area Plan at the detailed design stage should the development proceed prior to the commencement of the TMR works.

Bushfire

- 5) The proposed development is mapped by the State's Natural Hazards, Risks and Resilience mapping. While bushfire reporting has previously been provided, this was based on the earlier development design at the time. To support this development application, provide updated bushfire reporting based on the latest development design. Please note that further assessment matters may need to be addressed once Council has reviewed the updated reporting.*

Response: As detailed in the enclosed TMR correspondence, the Department is progressing the Gateway to Bruce Upgrade project, which includes vegetation clearing within the area currently identified as a bushfire hazard. TMR has advised that construction is anticipated to commence in late 2026, with vegetation clearing to occur thereafter, subject to the necessary environmental approvals.



Given the mapped bushfire hazard is associated with vegetation proposed to be removed as part of the TMR project, it is submitted that an updated Bushfire Hazard Assessment is not warranted at this time. Any assessment undertaken prior to the finalisation and implementation of the TMR works would be based on a bushfire hazard context that is expected to change materially.

Notwithstanding the above, the applicant is agreeable to a condition requiring the preparation of an updated Bushfire Hazard Assessment should the development proceed prior to the commencement of the TMR works.

Building Envelopes

- 6) *The submitted plans indicate that building envelopes are proposed for all small lots to enable future house to be constructed without further planning approval. Whilst in principle building envelopes may be supported, further detail is required to be provided.*
- a) *Provide plans showing the building envelopes on each of the small lots and clearly indicate all setback dimensions, built to boundary wall lengths and the location and maximum 4m dimension of future crossovers.*
 - b) *Table 1 which details the building envelope requirements is currently silent on some key built form aspects of the Dwelling house (small lot) code including building height and length. Include a note to Table 1 stating that the building height and length for each envelope is as per the acceptable outcomes of the Dwelling house (small lot) code.*

Response: Revised Proposal Plans and an updated Plan of Development are provided at Appendix A. The updated plans show the building envelopes for each small lot, including all relevant setback dimensions, built to boundary wall lengths, and the location and width of future crossovers.

In addition, Table 1 has been updated to include a note confirming that building height and building length for each building envelope is to be in accordance with the acceptable outcomes of the Dwelling house (small lot) code.

Road Widening

- 7) *The plans indicate a road widening in front of Lot 1; however, no information has been provided to the purpose of this widening. Please provide detail as to the purpose of this road widening and demonstrate it will tie in with the existing Dhoni Circuit.*

Response: The road widening shown in front of Lot 1 is proposed to facilitate an appropriate transition to the existing dedicated road reserve within Dhoni Circuit. The widening avoids creating hard edge conditions and improves alignment with the existing road reserve width. This is shown on the amended Proposal Plans provided at Appendix A.

Lot Services



8) *Provide a SAN Notice from Urban Utilities to demonstrate development can be serviced in accordance with the Subdivision code PO4.*

Response: Please refer to the enclosed Engineering Information Request Response Cover Letter for a response to this item.

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 arrange for public notification to be carried out for 15 business days.

Should you require any clarification, please contact me on (07) 3251 9460 or by email at kathleenhunter@saundershavill.com.

Yours sincerely

Saunders Havill



Kathleen Hunter

Senior Town Planner

