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STEFFAN HARRIES

Monday, 25 May 2026

Chief Executive Officer
Brisbane City Council
GPO Box 1434,
Brisbane Qld 4001

Attention: **Kellie Hilton**
Via email: kellie.hilton@brisbane.qld.gov.au

RE: RESPONSE TO INFORMATION REQUEST

Reconfiguration of a Lot
COUNCIL REF: A006866194
499 Mount Petrie Road, Mackenzie QLD 4156
Lot 1 on RP165127

Dear Kellie,

I refer to the Information Request received from Brisbane City Council dated the 21st of October 2025 in relation to the development application lodged for a Reconfiguration of a Lot at 499 Mount Petrie Road, Mackenzie. On behalf of the applicant, Steffan Harries provides the following response in addition to the following attachments:

- **Appendix A** – Traffic engineering assessment
- **Appendix B** – Site based stormwater management plan
- **Appendix C** – Arboricultural impact assessment
- **Appendix D** – Ecological assessment report
- **Appendix E** – Bushfire management plan

1. Lot Sizes

The subject site is in the Rural zone under Brisbane City Plan 2014. It is acknowledged there is limited scope for rural uses and activities to be accommodated on the site, however the purpose of the rural zone is also to support other uses where they are compatible with the character and environmental features of the zone. Development that protects semi-natural habitats and responds to land constraints, mitigates any adverse impacts on environmental values and addresses other specific characteristics as identified in overlays is supportable in this zone (as per Overall outcome 2(m) and 2(p) of the Rural zone code). It is noted that the performance outcome has been addressed however the proposed lot sizes do not provide the minimum rectangle dimensions in Table 9.4.10.3.B of the Subdivision code.

a) Amend the proposed reconfiguration to provide lots with minimum dimensions of 14m x 20m as outlined in Table 9.4.10.3.B of the Subdivision code

Response:

Council has requested that the proposed reconfiguration be amended to provide lots with minimum dimensions of 14m x 20m, as outlined in Table 9.4.10.3.B of the Subdivision code.

No amendment to the proposed layout has been provided in response to this item.

The proposed lots achieve the relevant performance outcome and overall outcomes of the Subdivision code. The 14m x 20m rectangle is an acceptable outcome pathway under AO1.1 and Table 9.4.10.3.B. It is not the only way to demonstrate compliance with the Subdivision code. The planning scheme allows a performance-based assessment against PO1 where the acceptable outcome is not met.

PO1 of the Subdivision code requires development to result in lots and an arrangement of lots that:

(a) enable the relevant outcomes and standards required by the planning scheme to be complied with for the intended use;
(b) are consistent with the zones, zone precincts, neighbourhood plans and overlays that apply to the site;
(c) feature a useable shape able to accommodate the minimum rectangle dimension in Table 9.4.10.3.B and anticipated future development;
(d) complement the streetscape, local context and character for the locality; and
(e) address development constraints.

The proposed lots range from 496m^2 to 570m^2. Each lot has a regular shape, direct road frontage and a practical depth. Each lot is capable of accommodating a future dwelling house, vehicle access, on-site parking, private open space, landscaping, servicing infrastructure and normal residential amenity. The lots are not irregular, fragmented, residual or constrained lots. They are functional residential lots that can support the intended future use.

The proposed frontages of approximately 11.3m do not prevent future dwelling houses from being established. A future dwelling house can be designed to respond to the site width, provide an appropriate built form, and comply with the relevant dwelling house assessment benchmarks at the building stage. The proposed lots therefore achieve PO1(a) and PO1(c) of the Subdivision code because they are capable of accommodating the intended future residential use.

The purpose of the Subdivision code is not to require numerical compliance for its own sake. Section 9.4.10.2(2)(b) requires reconfiguration to result in lots and an arrangement of lots that:

(i) achieve the relevant outcomes and comply with the standards required by the planning scheme for the zone, neighbourhood plan and overlays;
(ii) accommodate lawful uses;
(iii) are of an appropriate size, dimensions and arrangement suited to their intended use and proximity to infrastructure, services and facilities;
(iv) are arranged and configured to complement the pattern of development in the locality; and
(v) address development constraints and mitigate adverse impacts to character and environmental values.

The proposed subdivision achieves these outcomes.

First, each proposed lot accommodates a lawful and anticipated future residential use. A dwelling house is provided for in the Rural zone under Table 5.5.23. The proposal does not introduce an incompatible or intensive land use. It creates freehold lots capable of accommodating detached dwelling houses in a locality already characterised by detached residential development.

Second, the lots are of an appropriate size and arrangement for the intended use. The intended future use is a dwelling house, not a rural production activity. The existing site has an area of 2,688m^2. It is already substantially below the 10ha Rural zone lot size benchmark in Table 9.4.10.3.B. The land has limited practical capacity to operate as a productive rural holding. Requiring a 14m x 20m rectangle would not improve the rural functionality of the land. It would not restore rural production capacity. It would not protect any viable rural activity. It would simply reduce the number of detached dwelling lots in a location where the physical and planning context supports a suburban residential outcome.

Third, the proposed layout complements the pattern of development in the locality. Section 9.4.10.2(2)(b)(iv) requires the arrangement of lots to complement the pattern of development in the locality. The surrounding locality contains established and approved suburban residential development, including lots in the 400m^2 to 500m^2 range. The proposed lots of 496m^2 to 570m^2 are consistent with that established and emerging pattern. The proposal therefore responds to the actual character of the locality, rather than applying a rural lot configuration that does not reflect the surrounding subdivision pattern.

Fourth, the proposal responds to the Rural zone code in a balanced way. The purpose of the Rural zone is to provide for rural uses and activities, but it also provides for other uses and activities that are compatible with existing and future rural uses, the character of the zone and the environmental features of the zone, as stated in s6.2.6.5(1)(b). The proposal is compatible in this context because it provides for detached dwelling lots in an area where the site is already surrounded by a suburban lot pattern and where the site itself has limited practical capacity for rural use.

The Rural zone code also requires development to support the implementation of the Strategic framework, particularly Theme 2, Theme 3 and Theme 5, as stated in s6.2.6.5(2)(a). The proposed subdivision supports those broader outcomes by providing detached dwelling opportunities in an established serviced locality, while allowing the future building siting and detailed design to respond to environmental constraints and local character.

Council has also referred to overall outcomes 2(m) and 2(p) of the Rural zone code. Those outcomes are directly relevant. Section 6.2.6.5(2)(m) requires development to protect and enhance semi-natural and natural habitats and rural landscape values through appropriate design, construction and operation. Section 6.2.6.5(2)(p) requires development to respond to land constraints, mitigate adverse impacts on environmental values and address other specific characteristics identified by overlays or applicable codes.

The requested 14m x 20m rectangle does not materially advance either of those outcomes. A wider lot frontage would not improve habitat protection. It would not improve landscape value. It would not materially improve stormwater management, ecological protection, vegetation retention, dwelling siting or interface treatment. Those matters are addressed through the layout, servicing design, future building design and overlay responses. The proposed subdivision does not rely on a reduced frontage to avoid an environmental obligation. It provides regular, functional and serviceable lots while allowing constrained and sensitive areas to be managed through the relevant technical responses.

The Strategic framework also supports this approach. The Rural zone code expressly requires development to support the policy direction of the Strategic framework under s6.2.6.5(2)(a). In

this case, the site is in a locality that functions as part of Brisbane's suburban living environment rather than a productive rural area. The proposed subdivision provides detached dwelling lots in an accessible urban context. It also avoids an inefficient outcome where a small, already fragmented rural-zoned parcel is retained in a form that does not meaningfully contribute to rural production, rural landscape protection or environmental management.

The Greenspace System outcomes in s3.7.7 are also relevant. Those outcomes focus on protecting greenspace values, biodiversity, landscape values, water quality and ecological function. The proposed subdivision does not undermine those outcomes. A rigid requirement for a 14m x 20m rectangle would not better protect biodiversity or landscape values. The relevant planning question is whether the lots and future development can be arranged to protect and manage constraints. The proposed layout allows that to occur.

The proposal also aligns with the broader housing and city-shape outcomes of the planning scheme. It provides additional detached dwelling lots in a locality that already has urban services, nearby residential development and a suburban residential character. The subdivision provides a modest and efficient residential outcome. It does not create an isolated or incompatible urban form. It represents an orderly infill-style response to the established development pattern.

The 14m x 20m rectangle should therefore be treated as a guide to one form of compliance, not as a determinative requirement. The assessment is against PO1 of the Subdivision code and the relevant overall outcomes. On that assessment, the proposed lots are acceptable because they:

- are regular and usable;
- can accommodate future dwelling houses;
- provide direct frontage and practical access;
- are compatible with the surrounding subdivision pattern;
- do not compromise rural production on a viable rural holding;
- respond to the actual suburban character of the locality;
- allow environmental and overlay matters to be managed; and
- achieve the purpose and overall outcomes of the Subdivision code.

For these reasons, the requested amendment is not necessary. The proposed layout achieves PO1 of the Subdivision code, s9.4.10.2(2)(b), and the relevant Rural zone code outcomes in s6.2.6.5(1)(b), s6.2.6.5(2)(a), s6.2.6.5(2)(m) and s6.2.6.5(2)(p).

The proposed subdivision should therefore be supported without amendment to provide a 14m x 20m rectangle on each lot.

2. Traffic

The proposed left-out crossover is located on a crest, which restricts sight distance to both the south and north and Kerbside bin presentation on and after the crest is not supported. Detail of proposed presentation is not shown on the proposed plans, additional transfer paths are unlikely to be suitable given grades and level differences. The current proposal has only provided limited supporting information and critically, no RPEQ assessment of the proposed accesses and servicing provision. TAPS AO9.4 / AO11.1 has not been considered or addressed or a justification for PO9 / PO11 has not been provided. At this time there is insufficient supporting evidence to support the proposed site accesses and servicing arrangement. An RPEQ-endorsed Transport Impact Statement (TIS) is required to confirm that the available Safe Intersection Sight Distance (SISD) complies with the Austroads Guide to Road Design Part 4A requirements. The TIS should also provide supporting evidence, such as on site photos,

verifying the available SISD. It is noted that the Code assessment provided states that sightline requirements are met however, there is no assessment or RPEQ endorsement of the outcome to support this statement. It is considered that the vertical crest restricting sightlines to the south at the site access is not addressed. From traffic engineering perspectives, proposal is not supported in current format and further design refinement and supporting documentation is required.

Response:

An updated traffic engineering assessment has been prepared by Modus Traffic and Transport Engineering and is submitted with this response and is attached as **Appendix A**.

The updated assessment directly responds to Council's concerns regarding the vertical crest, available sight distance, crossover operation, kerbside refuse collection and compliance with the Transport, access, parking and servicing code.

The updated assessment is endorsed by Harj Singh, Executive Director, RPEQ 22364. It therefore addresses Council's request for RPEQ assessment of the proposed access and servicing arrangement.

Access arrangement:

The proposal has been refined to respond to the sight distance constraint identified by Council. The updated traffic assessment confirms that Mount Petrie Road includes double continuous centre lines at the site frontage. On that basis, the relevant sight distance assessment is directed to through-bound vehicles approaching from the south.

The updated assessment identifies that a minimum Safe Intersection Sight Distance (SISD) of 92m is required, based on a 50km/h design speed and the Austroads Guide to Road Design series. The assessment confirms that the southernmost access achieves the required 92m SISD.

The assessment also accepts that the northernmost access does not achieve the minimum SISD requirement for outbound movements. The access arrangement has therefore been amended so that:

- the northernmost crossover operates as entry only;
- the southernmost crossover operates as exit only;
- modified crossover flares are provided to physically discourage incorrect movements;
- signage and line marking are provided to reinforce the intended access operation;
- outbound movements occur from the southernmost access, where SISD is achieved.

This is a direct design response to Council's concern that the previous left-out crossover was affected by the crest. The proposal no longer relies on the northernmost access for outbound movements.

Compliance with the Transport, access, parking and servicing code:

The proposal achieves PO9 and PO11 of the Transport, access, parking and servicing code.

PO9 requires access driveways in the road area to be located, designed and controlled to minimise adverse impacts on the safety and operation of the transport network, including pedestrians and cyclists, and to protect the amenity of adjacent premises.

The proposal satisfies PO9 because the access arrangement has been designed to manage the known sight distance constraint. The northern access is restricted to entry only. The southern access is used for exit movements. The southern access achieves the required SISD. The arrangement reduces conflict points, avoids unsafe outbound movements from the northern access, and uses signage and line marking to control driver behaviour.

AO9.4 requires access driveways in the road area to be located, designed and controlled in accordance with the Transport, access, parking and servicing planning scheme policy, and not be provided through a bus stop, taxi rank, pedestrian crossing or refuge.

The proposal does not strictly rely on deemed compliance with AO9.4. Instead, compliance is demonstrated against PO9. The updated RPEQ assessment confirms that the proposed access design is acceptable from a traffic engineering perspective, subject to the recommended split access arrangement, modified crossover design, signage and line marking.

PO11 requires the internal approach to an access driveway in the road area to be designed and located to provide for the safety of pedestrians and cyclists using paths adjacent to the frontage of the site, and motorists.

The proposal satisfies PO11 because the access operation has been refined to direct outbound traffic to the southern access, where the required sight distance is achieved. The access arrangement also provides a legible and controlled internal approach, supported by signage, line marking and crossover geometry. The swept path assessment confirms that a B99 design vehicle can safely and efficiently manoeuvre to, within and from the site.

AO11.1 requires sight distances to and from proposed access driveways and intersections to comply with the Transport, access, parking and servicing planning scheme policy. The updated assessment demonstrates that the exit movement from the southern access achieves the required SISD. The northern access is not used for outbound movements. The proposal therefore satisfies PO11 through a controlled operational design that directly responds to the site-specific geometry.

The proposal is also consistent with the purpose and overall outcomes of the Transport, access, parking and servicing code in s9.4.11.2. In particular:

- s9.4.11.2(2)(c) is achieved because the proposal provides safe access without adversely impacting the efficiency and safety of the transport network;
- s9.4.11.2(2)(e) is achieved because the access arrangement minimises adverse impacts on the road network and road users;
- s9.4.11.2(2)(g) is achieved because the design maximises safety for road users through restricted movements, signage and line marking;
- s9.4.11.2(2)(i) is achieved because the development is of a small scale and maintains the safety and efficiency of the transport network;
- s9.4.11.2(2)(k) is achieved because the servicing arrangement is adequate for the expected demand and avoids significant adverse impacts on the external road system.

The proposal also satisfies PO1 of the Transport, access, parking and servicing code. The updated traffic assessment provides a technically competent and accurate response to the traffic and access matters raised by Council. It includes an RPEQ-endorsed assessment, sight distance assessment, traffic plan and swept path assessment. This is consistent with PO1 and the supporting note to PO1 in Table 9.4.11.3.

Traffic generation:

The proposed subdivision creates five residential lots. This is a net increase of four dwellings over the existing dwelling house.

The updated traffic assessment confirms that the proposal will generate approximately four additional vehicle movements in the peak hour. This is a very low level of traffic generation.

The access arrangement therefore needs to be assessed in its proper context. This is not a high-turnover commercial use, a major development or a freight-generating use. It is a small residential subdivision with low peak-hour traffic generation. The revised access design is proportionate to that scale and adequately manages the identified sight distance constraint.

Crash history:

The updated traffic assessment reviewed historic TMR crash data for the previous five-year period. It identified no recorded crashes near the site frontage.

This supports the conclusion that the frontage can operate safely with the refined access and servicing arrangement. It also supports the view that the development will not create an unacceptable road safety impact, given the low increase in vehicle movements and the controlled access design.

Refuse collection and kerbside presentation:

Council raised concern about kerbside bin presentation on or after the crest.

The updated traffic assessment responds to this concern by identifying a recommended kerbside bin collection location generally consistent with the current refuse presentation area. The recommended bin presentation area is located south of the vertical crest, where improved forward visibility is available to approaching vehicles.

The updated assessment concludes that kerbside refuse collection is the safest practicable servicing arrangement for this development. That conclusion is supported by the following matters:

- kerbside refuse collection already occurs along the site frontage and in the surrounding area;
- the recommended bin presentation area is located south of the crest, not at the constrained northern access point;
- the height of a refuse collection vehicle, approximately 4m, is visible to vehicles approaching from the south;
- the sight distance review identifies that the minimum SISD of 92m is achieved;
- refuse collection is short in duration and typically occurs outside peak traffic periods;
- the servicing demand is low, being limited to a five-lot residential subdivision;
- an on-site refuse collection arrangement would require a refuse collection vehicle to enter, turn and exit within a constrained residential access environment, which would introduce a higher safety risk.

The revised arrangement therefore provides a better safety outcome than requiring on-site refuse collection by a Council side loading RCV. The proposed kerbside arrangement avoids unnecessary RCV manoeuvring within the site and avoids the need for the RCV to enter and exit a constrained residential access. It also avoids a design response that would require substantial internal pavement and crossover changes for a very small residential subdivision.

Servicing:

General servicing demand for the five dwellings will be infrequent. The updated assessment identifies that servicing associated with moving in and out of dwellings is expected to occur rarely. The proposal is not expected to generate regular heavy vehicle servicing demand.

This is relevant to PO19 and PO20 of the Transport, access, parking and servicing code. PO19 requires servicing to be clearly defined, safe, easily accessible and designed to contain potential adverse impacts. PO20 requires service vehicle access routes to minimise impacts on amenity and safety in residential areas and on roads not constructed to accommodate increased heavy vehicle movements.

The proposal achieves those outcomes because it does not create a regular service vehicle demand. Refuse collection is managed by the nominated kerbside collection arrangement. General servicing will be infrequent and can occur without compromising the safety or efficiency of the road network.

Conclusion:

The updated traffic assessment resolves Council's concern about insufficient supporting evidence.

The proposal now includes:

- an RPEQ-endorsed traffic engineering assessment;
- a sight distance assessment;
- confirmation of the required 92m SISD;
- confirmation that the southern access achieves SISD;
- recognition that the northern access should not be used for outbound movements;
- a refined split access arrangement;
- modified crossover design;
- signage and line marking;
- a B99 swept path assessment;
- a recommended kerbside bin collection location;
- a technical justification for kerbside collection as the lower-risk servicing outcome.

The proposal achieves PO1, PO9 and PO11 of the Transport, access, parking and servicing code. It also achieves the relevant overall outcomes in s9.4.11.2, particularly s9.4.11.2(2)(c), (e), (g), (i) and (k).

On this basis, the proposed access and servicing arrangement is acceptable and should be supported.

3. Refuse

Mobile garbage bin presentation and collection areas have not been demonstrated on the proposed plans. Additionally, no RPEQ certified traffic report has been supplied to demonstrate that safe collection of mobile garbage bins can be achieved by Council's side loading refuse collection vehicle (RCV). Given the vertical geometry, double centre lines and 80km/h speed environment on a major road, kerbside collection of mobile garbage bins will result in unacceptable safety impacts on the road network which does not comply with AO4.1 of the Subdivision code and AO8.1/AO8.2 of the Infrastructure design code and is not supported. Similarly, safe on site collection of mobile garbage bins has not been demonstrated and the proposed crossover and pavement widths do not comply with requirements of AO1 of the

Transport, access, parking and servicing code. Further information is required to enable further assessment of the proposal.

a) Provide amended plans that demonstrating that mobile garbage bins (2 per lot at 1.8m(L) by 0.9m(D)) can be safely collected on site by Council's side loading RCV without compromising the safety of the RCV or other road users. The RCV must enter and exit the site in forward gear with appropriately sized crossovers and internal pavements. Denote widths and include gradients to all areas.

b) Provide an RPEQ certified traffic report including plans, documents, dimensioned drawings and a sight distance assessment to demonstrate the proposed development complies with the requirements of the Transport, access, parking and servicing code and the standards and guidelines of the Transport, access, parking and servicing planning scheme policy. Any performance outcomes sought, including on site collection of mobile garbage bins, must be assessed and endorsed by the RPEQ.

c) Amended the code responses to the Transport, access, parking and servicing code.

Response:

The updated traffic engineering assessment confirms that kerbside collection remains the safest practicable servicing outcome for this small residential subdivision. The assessment is endorsed by an RPEQ and is submitted with this response.

Kerbside collection is the preferred and lower-risk outcome:

The proposal involves five dwelling house lots. The refuse demand is limited and residential in nature. Each future dwelling will be serviced by mobile garbage bins. The total presentation demand is low, being two mobile garbage bins per lot where general waste and recycling bins are presented together.

The Refuse planning scheme policy expressly contemplates kerbside collection for residential development. Section 4(3) provides that residential development is to utilise kerbside collection where the bin storage area and kerbside collection point can be appropriately accommodated in accordance with section 4.1.

Section 4.1(2) of the Refuse planning scheme policy requires each dwelling's collection point to comprise a minimum of two areas, each 0.81m2, being 0.9m x 0.9m, to accommodate mobile garbage bins. The updated traffic plan identifies a recommended kerbside bin collection location south of the vertical crest, generally consistent with the current refuse presentation area.

The proposal therefore responds to the relevant servicing outcome by identifying a practical kerbside collection point, rather than requiring an RCV to enter and manoeuvre within a constrained residential access arrangement.

On-site RCV collection would create a less safe outcome:

Council has requested that the RCV enter and exit the site in forward gear, with appropriately sized crossovers and internal pavements.

That arrangement is not proposed because it would require a heavy refuse vehicle to enter a small five-lot residential subdivision from Mount Petrie Road, manoeuvre internally, service bins, and return to Mount Petrie Road. Given the site geometry, levels, access configuration and the scale of the development, this would introduce a greater traffic and safety burden than kerbside collection.

The Refuse planning scheme policy confirms the extent of design burden created by on-site RCV collection. Section 3(5) requires the area trafficked by an RCV to comply with the Transport, access, parking and servicing planning scheme policy, including a minimum aisle or carriageway width of 6.5m. Section 3(7) also requires entry and exit points to allow sufficient ingress and egress for the RCV, including a minimum 6.5m crossover. Section 3(15) requires the pad where the collection vehicle stands to have a maximum gradient of 2% where the on-site manoeuvring area exceeds 5%.

Retrofitting that level of RCV infrastructure into a five-lot residential subdivision would be disproportionate. It would increase hardstand, crossover width and internal pavement area. It would also increase heavy vehicle manoeuvring within a residential access environment. That outcome would not better achieve safety, amenity or streetscape outcomes.

The relevant planning question is not whether on-site RCV collection can be forced into the layout. The relevant question is whether the proposed servicing arrangement safely and efficiently services the development. The RPEQ assessment confirms that kerbside collection is the lower-risk and more appropriate servicing outcome.

Response to AO4.1 of the Subdivision code:

AO4.1 of the Subdivision code requires development to provide land and works for infrastructure and services in compliance with the Local government infrastructure plan, Infrastructure design planning scheme policy, Refuse planning scheme policy, Transport, access, parking and servicing planning scheme policy, Long term infrastructure plan, and other applicable codes and policies.

The proposal satisfies PO4 of the Subdivision code because it provides for infrastructure and services while maintaining the safety, efficiency and capacity of infrastructure networks.

The proposed refuse collection arrangement is appropriate because:

- the development is small, being five dwelling house lots;
- the refuse demand is limited to mobile garbage bins;
- residential kerbside collection is contemplated by s4(3) of the Refuse planning scheme policy;
- the collection point is identified south of the vertical crest;
- the RPEQ assessment confirms SISD of 92m is achieved to the relevant southern approach;
- the height of an RCV makes the collection activity visible to approaching traffic;
- collection activity is short in duration;
- the proposal avoids heavy vehicle manoeuvring within the site;
- no recorded crashes are identified near the site frontage over the reviewed five-year period.

The proposal therefore achieves PO4 of the Subdivision code. It also satisfies the intent of AO4.1 by providing a refuse servicing solution that is safe, efficient and consistent with the relevant planning scheme policies when assessed in context.

Response to AO8.1 and AO8.2 of the Infrastructure design code:

PO8 of the Infrastructure design code requires refuse and recycling collection, separation and storage facilities to be located and managed so adverse impacts on building occupants, neighbouring properties and the public realm are minimised.

AO8.1 requires refuse and recycling collection and storage facilities to be provided in accordance with the Refuse planning scheme policy. AO8.2 requires refuse and recycling collection and storage location and design to avoid adverse impacts, including odour, noise or visual impacts on amenity.

The proposal achieves PO8.

The future dwellings will each provide on-lot mobile garbage bin storage. The kerbside collection point is only used on collection day. That is a normal residential servicing outcome. It does not create a permanent visual, odour or acoustic impact. The nominated collection point is located to avoid the constrained crest location and to allow collection to occur in a safer position.

The Refuse planning scheme policy supports kerbside collection for residential development where it can be appropriately accommodated. The updated RPEQ assessment confirms that it can be appropriately accommodated in this case.

The proposal therefore achieves PO8, AO8.1 and AO8.2 of the Infrastructure design code.

Response to AO1, PO1, PO9, PO11, PO18, PO19 and PO20 of the Transport, access, parking and servicing code:

AO1 of the Transport, access, parking and servicing code requires compliance with the Transport, access, parking and servicing planning scheme policy. PO1 requires a technically competent and accurate response to transport and traffic matters, prepared to ensure efficient operation and safety.

The updated traffic engineering assessment satisfies PO1. It provides an RPEQ endorsed assessment, sight distance review, access recommendations, traffic plan and swept path assessment.

The proposal also achieves PO9 and PO11.

PO9 requires access driveways in the road area to be located, designed and controlled to minimise adverse impacts on the safety and operation of the transport network, including pedestrians and cyclists. PO11 requires the internal approach to an access driveway to be designed and located for the safety of pedestrians, cyclists and motorists.

The updated traffic assessment responds to those outcomes by recommending:

- the northern access operate as entry only;
- the southern access operate as exit only;
- modified crossover flares to discourage incorrect movements;
- no entry and exit only signage;
- line marking to support the intended access operation;
- exit movements from the southern access, where the required SISD is achieved.

The assessment confirms a 92m SISD requirement based on the adopted design speed and confirms that the southern access achieves that requirement. The northern access is not relied upon for outbound movements.

The refuse collection arrangement also satisfies PO18, PO19 and PO20.

PO18 requires development to be serviced by an adequate number and size of service vehicles. The development is a small residential subdivision and is appropriately serviced by Council's

side loading RCV through kerbside collection.

PO19 requires servicing to be clearly defined, safe and easily accessible, and designed to contain potential adverse impacts. The kerbside presentation point is identified on the updated traffic plan. It is south of the crest and avoids the higher-risk outcome of bringing the RCV into the site.

PO20 requires service vehicle access routes to minimise impacts on amenity and safety in residential areas and on streets not constructed to accommodate increased heavy vehicle movements. Kerbside collection achieves this outcome because it avoids creating a new heavy vehicle route within a small residential access environment.

Response to Council's request for on-site collection plans:

The requested on-site RCV collection arrangement is not provided because it is not the preferred traffic engineering or planning outcome.

The scheme does not require on-site RCV collection in every residential subdivision. Section 4(3) of the Refuse planning scheme policy identifies kerbside collection as the expected residential servicing method where it can be appropriately accommodated. The updated RPEQ assessment demonstrates that kerbside collection can be accommodated in this case.

On-site RCV collection would require a much larger internal pavement and crossover arrangement, including 6.5m aisle and crossover widths and compliant standing grades under s3(5), s3(7) and s3(15) of the Refuse planning scheme policy. That design response would be excessive for five detached dwelling lots and would likely create greater safety, amenity and streetscape impacts than the proposed kerbside arrangement.

Response to Council's request for an RPEQ certified traffic report:

An RPEQ endorsed traffic engineering assessment is submitted with this response.
The assessment addresses:

- access arrangements;
- sight distance;
- SISD;
- the vertical crest;
- double centre lines;
- the proposed split access arrangement;
- signage and line marking;
- swept paths;
- traffic generation;
- crash history;
- refuse collection.

The assessment concludes that the proposed access and servicing arrangements are acceptable from a traffic engineering perspective.

Response to Council's request to amend code responses:

The code response is amended as follows.

Subdivision code, PO4 and AO4.1
The proposal achieves PO4. The development provides for infrastructure and services,

including refuse collection, in a manner that maintains the safety, efficiency and capacity of infrastructure networks. Kerbside collection is proposed for the five residential lots. The collection point is identified south of the vertical crest on the RPEQ endorsed traffic plan. The arrangement is consistent with the residential kerbside collection outcome contemplated by s4(3) and s4.1 of the Refuse planning scheme policy.

Infrastructure design code, PO8, AO8.1 and AO8.2
The proposal achieves PO8, AO8.1 and AO8.2. Each dwelling lot can accommodate on-lot storage for mobile garbage bins. Kerbside presentation is limited to collection days. The nominated collection point avoids the crest and does not create unreasonable visual, acoustic, odour, pedestrian, cyclist or traffic impacts. The arrangement is consistent with the Refuse planning scheme policy.

Transport, access, parking and servicing code, PO1 and AO1
The proposal achieves PO1. An RPEQ endorsed traffic engineering assessment has been submitted. The assessment provides a technically competent and accurate response to access, sight distance, traffic generation, swept paths and servicing. Strict deemed compliance with AO1 is addressed through the submitted RPEQ assessment and performance-based response.

Transport, access, parking and servicing code, PO9, AO9.3 and AO9.4
The proposal achieves PO9. The access arrangement is controlled through entry-only and exit-only movements, modified crossover flares, signage and line marking. Outbound movements are directed to the southern access, where the RPEQ assessment confirms the required SISD is achieved.

Transport, access, parking and servicing code, PO11 and AO11.1
The proposal achieves PO11. Sight distance to the exit access has been assessed by the RPEQ and the required SISD is achieved. The northern access is not used for outbound movements. The access arrangement therefore provides for motorist, pedestrian and cyclist safety.

Transport, access, parking and servicing code, PO18, PO19 and PO20
The proposal achieves PO18, PO19 and PO20. Refuse collection is provided by Council's side loading RCV through kerbside collection. The collection point is identified. The servicing demand is low. The arrangement avoids unnecessary RCV manoeuvring within the site and minimises impacts on the safety and operation of Mount Petrie Road.

Conclusion

The proposed kerbside collection arrangement should be supported.

It is the safest practicable servicing arrangement for this five-lot residential subdivision. It is supported by the RPEQ endorsed traffic assessment. It avoids a disproportionate and higher-risk on-site RCV manoeuvring outcome. It achieves PO4 of the Subdivision code, PO8 of the Infrastructure design code, and PO1, PO9, PO11, PO18, PO19 and PO20 of the Transport, access, parking and servicing code.

4. Earthworks

Further information is required to demonstrate the extent of cut and fill required on the site to achieve acceptable access and to demonstrate compliance with the Filling and excavation code in addition to identifying of earthworks will impact on existing vegetation. All retaining structures are to be contained within the lot boundary.

Response:

Please find an updated earthworks plan within the new site based stormwater management plan attached as **Appendix B.** Additionally, please find an arboricultural report and ecological assessment report attached as **Appendix C & D** that demonstrate the impact on existing vegetation. No further issues have been identified as a result of this additional reporting.

5. Stormwater

The concept stormwater plan provided, indicates a total stormwater discharge via a 150mm pipe which does not comply with Infrastructure Design PSP. The proposed site is a high-risk site from a water quality perspective as it is greater than 2,500m² and the proposal will result in an impervious area greater than 25% of the net developable area. a) Provide a stormwater management plan including engineering drawings and calculations, demonstrating non worsening of downstream properties to comply with the Infrastructure Design PSP, Section 7 and the Stormwater code.

a) Cross sections are to be provided for the verge and proposed access easement routes. Removal of existing retaining walls in the road reserve may assist in the provision of safe site access.

b) Provide additional cross sections along the longitudinal axis of the lots (x 2) to confirm compliance with Filling and Excavation code.

Response:

Please find an updated earthworks plan within the new site based stormwater management plan attached as **Appendix B.** No further issues have been identified as a result of this additional reporting.

6. Ecological Values

The proposed development is within the High Ecological Significance (HES) and High Ecological Significance Strategic (HESS) sub-categories and wholly within the Koala habitat area sub-category of the Biodiversity areas overlay. The Biodiversity areas overlay code under PO4 requires that the development ensures that ecological features and ecological processes, koala habitat trees and areas of strategic biodiversity value are protected, conserved and restored. As well as protect the maximum number of non-juvenile koala habitat trees (NJKHTs) and consolidate and maximise the size of areas to be conserved on site in combination with adjoining sites (PO7).

It is unclear from the information provided how the development will achieve compliance with the performance outcomes of the Biodiversity areas overlay code, in particular PO4 and PO7. The current proposed plans do not appear to allow for broader retention of NJKHTs potentially present on site. Additionally, no ecological information has been provided to identify the vegetation on-site. Based on the ecological values present on site, the subdivision layout may be required to be amended to allow for more native vegetation and NJKHTs to be retained towards the west and south of the site.

a) Provide an updated code assessment specifying how compliance will be achieved for the related performance outcomes of the Biodiversity areas overlay code.

b) Provide a Tree Survey Plan using survey accurate methodology in accordance with the Biodiversity Planning Scheme Policy including:

i. All trees 150 mm DBH or greater on site/external works area and within 6 m of site boundaries.
ii. The proposed development plan (as an overlay) including all services/infrastructure on site and external to the site, which clearly shows the full extent of all earthworks (cut/fill) required during construction of the development.
iii. A clear indication of which trees are to be retained and which trees are to be removed, including the following information:

- Scientific name;
- Height;
- Diameter of tree trunk at breast height (DBH);
- Crown diameter;
- Habitat features including hollows and scratch marks, nests etc.
- Tree Protection Zones (TPZs) (in accordance with AS4970); and
- General health assessment.

iv. 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.
v. Detail of fauna movement solutions to enable safe movement of fauna throughout the site and within the wider landscape.
vi. For any significant residual impact, offsets may be required under the Environmental Offsets Act 2014 and the Offsets Planning Scheme Policy.

Response:

Please find an ecological assessment report attached as **Appendix D** that has a supporting arboricultural assessment attached as **Appendix C**. These new documents and plans provide a response to the above noted information request item. No further issues have been identified as a result of this additional reporting.

7. Bushfire Hazard

The site is mapped within a Bushfire Hazard Area in the State's Natural Hazards, Risk and Resilience mapping. A response has not been provided to address this mapping, therefore further information is required. a) Provide an assessment against the SPP Assessment Benchmarks for Natural Hazards, Risk and Resilience. City Plan's Bushfire Overlay Code can be used as a means of demonstrating compliance with these benchmarks. Additionally, the Queensland Government has recently published SPP guidance material to assist in demonstrating compliance with the SPP Natural Hazards, Risk and Resilience assessment benchmarks.

Response:

Please find a bushfire management plan attached as **Appendix E**.

8. Existing Trees

Earthworks and retaining walls are proposed within the TPZ of trees within the site and on adjoining sites. Information is required to allow the assessment of ecological and landscape values of existing trees, and trees on the boundary or on adjoining lots must not be impacted by the proposal.

Trees within the site and on adjoining lots are protected by NALL (Significant Native Vegetation) and the landscape values of existing trees meeting one or more the categories described in Section 2 of the Vegetation planning scheme policy will be assessed by the Landscape Architecture team when a Tree Survey has been provided.

a) Revise the extent of proposed earthworks to ensure the retention of Significant Vegetation within the site and trees wholly or partly contained on adjoining lots.
b) Provide a Tree Retention Plan that identifies the retention of:

i. Trees within the site meeting one or more criteria of Significant Vegetation as described in Section 2 of the Vegetation planning scheme policy;
ii. All trees located on a site boundary or on an adjoining lot;
iii. Council street tree(s) within the verge.

NOTE: Depending on the resolution of information provided, an Arboricultural Impact Assessment (AIA) may still be required for assessment prior to approval.

Response:

Please find an ecological assessment report attached as **Appendix D** that has a supporting arboricultural assessment attached as **Appendix C**. These new documents and plans provide a response to the above noted information request item. No further issues have been identified as a result of this additional reporting.

As per section 13.2 of the DA Rules, this letter provides a response to:
a) all of the information requested.

Should Council have any outstanding issues associated with the information provided within this report, we formally request that Council informs us prior to making a decision.

We will now progress with public notification as per the DA Rules requirements.

Kind regards,

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