Attention:
Laura Urbina
Senior Urban Planner
Planning Services North.

Re: Application reference: A007090287.
Proposed change to development approval – reconfiguring a lot at 171 and 173 Upper Kedron Road and 24 Persimmon Street, Ferny Grove. 4055.

Dear Ms Urbina,

I am the owner and occupier of the ….
My property comprises approximately one hectare and is presently used for a single dwelling.

I do not object to the orderly development of the application land. However, I object to the proposed development in its current form because the proposal does not adequately demonstrate that the development will achieve an integrated and coordinated urban outcome, protect the reasonable future development potential of adjoining Emerging community zoned land, or appropriately manage traffic, servicing, earthworks, drainage and amenity impacts.

My concerns are directed particularly to the relevant performance outcomes of the Emerging community zone code, the Ferny Grove–Upper Kedron neighbourhood plan code and the applicable reconfiguring a lot, transport, access, parking and servicing, filling and excavation, stormwater and environmental assessment benchmarks in Brisbane City Plan 2014.

Integrated development and protection of adjoining development potential

The Emerging community zone and the Ferny Grove–Upper Kedron neighbourhood plan contemplate coordinated urban development that responds to site constraints, supports functional and integrated communities, and does not prejudice the orderly development of adjoining land.

The proposed layout does not adequately address this requirement and could materially constrain the future integration of 179 Upper Kedron Road into the planned urban area.
The applicant should therefore demonstrate how the proposal will facilitate rather than prejudice future road, pedestrian, stormwater and utility connections to adjoining Emerging community zoned land. This assessment should address the ultimate development scenario for the wider area, not merely the immediate requirements of the application site.

Road network integration and future traffic

The applicable planning scheme outcomes require a safe, legible and connected movement network that integrates with existing and future development and is capable of accommodating its ultimate traffic catchment.

The published material does not clearly demonstrate that the proposed internal road network, or its intersection with Upper Kedron Road, has made adequate allowance for traffic that may be generated by the reasonable future development of adjoining land. If adjoining property is expected to obtain vehicular access through the proposed development, their future traffic must be included in the assessment of road intersection performance, road reserve width, geometry and network capacity.

.... approximately 10-metre-wide Urban Utilities water-supply easement along .... . This materially constrains alternative access arrangements. On the available information, a future connection through New Road 02 appears to be the most practicable means of .... the planned road network. Council should require the applicant to demonstrate a feasible vehicular access connection by providing corner truncations on proposed Lots 1 and 33, designed to support a future road ....

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The applicant should provide:

- a revised traffic impact assessment based on the ultimate development catchment
- confirmation that New Road 02 and the Upper Kedron Road intersection have sufficient capacity and an appropriate design for the ultimate catchment
- corner truncations on proposed Lots 1 and 33.

Coordinated and adequately sized infrastructure

The planning scheme's servicing outcomes require urban development to be supported by coordinated, efficient and adequately sized infrastructure.

The Site Based Stormwater Management Plan indicates that proposed water and sewer reticulation within New Road 02 will extend ....
. I support infrastructure being made available at an appropriate boundary connection point, provided that its capacity, level, alignment and method of extension are suitable for the reasonable future development of adjoining land.

The application material should also identify the proposed electricity network and demonstrate how electricity can be extended to adjoining land without unnecessary duplication or disturbance.

The applicant should provide:

- confirmation that all water, sewer, electricity and stormwater infrastructure has sufficient capacity to accommodate the reasonable future development of adjoining Emerging community zoned land
- appropriate lawful connection points....
- details of the proposed underground electricity network and provision for its future extension

Earthworks, retaining structures and boundary integrity

The proposal involves substantial filling, excavation and retaining works....
....The applicant should demonstrate that the proposed retaining structures:

- maintain the stability and integrity of both properties
- provide sufficient setbacks for construction, drainage, inspection and ongoing maintenance
- are located wholly within the application land (including all footing and associated drainage) do not rely on support from, encroachment upon ....
- can be constructed and maintained without trespass by personnel, plant or equipment.

Residential amenity and construction impacts

The scale and proximity of the proposed earthworks are likely to create material impacts from dust, noise, vibration, construction traffic, loss of ....
security and safety risks. These matters should be managed by enforceable conditions rather than being left for resolution after works commence.

I respectfully request a permanent acoustic fence, approximately 2 metres high, ...
. The fence should be constructed at the commencement of works, before substantial clearing or earthworks occur, so that it provides an effective buffer from construction noise and dust, maintains security, and protects the privacy safety and amenity.... during and after the development. Council should also impose conditions requiring:

- dust suppression and stabilisation of disturbed surfaces
- noise, vibration and permitted hours of work
- protection of adjoining property and infrastructure

Environmental constraints and ecology

The applicant's response to Council's Information Request states that the application site is a comparatively unconstrained development opportunity and should accommodate greater density in lieu of impacts on ecologically constrained adjoining parcels. While I do not object to the residential density of the proposal, the environmental constraints applying to other land should not transfer an unreasonable share of the wider area's environmental obligations to adjoining properties.

Adequacy and transparency of the assessment material

I received notice requiring any submission to be made by 30 October 2026. Council's information request dated 18 September 2026 raised significant matters, and the applicant's response dated 6 October 2026 does not appear to resolve all concerns raised by the Council.

I request that all materially amended plans, technical reports and responses relied upon by Council should be made publicly available well before the application is decided, so I may be afforded the opportunity to respond to any unresolved matters.

Requested outcome

For the reasons outlined above, Council should not approve the proposed development in its current form. Before determining the application, Council should require amended plans and supporting assessments that:

- demonstrate an integrated development outcome for the application site and adjoining Emerging community zoned land
- protect a feasible future road connection and associated infrastructure corridor at New Road 02
- assess traffic and intersection performance for the ultimate development catchment
- provide adequately sized and coordinated water, sewer, stormwater and electricity infrastructure with suitable future connection points
- resolve retaining-wall, earthworks, drainage, stability, construction-access and boundary impacts
- include enforceable conditions managing construction impacts and protecting adjoining property.

I would appreciate Council's consideration of these matters. If you require any further information, please contact me using the details below.

Yours sincerely,

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