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29 April 2026

Bowen & Xy Pty Ltd
C/- Gaskell Planning Consultants
PO Box 8103
WOOLLOONGABBA QLD 4102

ATTENTION: Nathaniel Hickey

Application Reference: A006881302
Address of Site: 11 AMISFIELD AVE NUNDAH QLD 4012

Dear Nathaniel

RE: Further advice

Council has reviewed the information request response. While the application seeks to justify additional building height, the response does not adequately address Council's key concerns regarding bulk, scale and amenity impacts arising from multiple performance outcomes under Brisbane City Plan 2014. These impacts are directly attributable to the excessive building height, bulk and scale and cannot be satisfactorily mitigated through building form measures or conditioning alone. A reduction in building height, bulk and scale is imperative to resolve these issues and achieve an appropriate development outcome. In its current form, the proposal represents an overdevelopment of the site and is not supported.

To reiterate Council's initial request, a comprehensive response to the following items is once again required to progress the development application.

Overdevelopment

- 1) Council acknowledges there may be merit in additional height from the acceptable outcome of three-storeys, where it is clearly justified and appropriately moderated. The response relies on a comparison against the maximum height provisions identified for the Union Street Precinct. However, this is not an appropriate benchmark for the subject site, as the maximum provisions are intended for substantially larger sites that can better accommodate the associated built form outcomes and transitions.

Given the subject site's smaller area, the neighbourhood plan anticipates a lower scale outcome and therefore, AO1.1/PO1 of the Toombul–Nundah Neighbourhood Plan Code has not been met. To address this item, provide the following:

- a) Revised plans are to reduce the number of storeys and demonstrate how the resulting building height satisfies PO1 of the Toombul–Nundah neighbourhood plan code.
- b) Revised plans to incorporate and clearly demonstrate effective building form measures (including increased setbacks, articulation and building envelope controls) that appropriately moderate the additional height and reduce bulk and scale impacts. The review should include an increase in the rear setback, northern side setback and a reduction in site cover.

Transport, access, parking and servicing code

- 2) The proposed number of resident car parking spaces does not comply with Performance outcome PO14 of the Transport, access, parking and servicing code. Whilst the response explains its planning justification by emphasising proximity to public transport, it does not meet walkable distances and provides comparisons to neighbouring developments that have varied circumstances. Justification for reduced car parks also refers to an alternative parking framework that is not applicable to this site.

As a result, compliance with the parking rates in Table 14 of the Transport, access, parking and servicing Planning Scheme Policy has not been demonstrated, nor has it been shown how the parking shortfall would avoid adverse traffic, parking or amenity impacts.

To address this item, submit:

- a) Revised plans demonstrating the minimum required car parking spaces in accordance with Table 14 of the Transport, access, parking and servicing planning scheme policy (TAPS PSP). The minimum required car parking spaces is 16 resident parks and 2 visitor spaces.
- b) Confirmation that all required parking spaces are designed in accordance with the dimensional and access requirements of the Planning Scheme Policy and are free of obstructions.
- c) Alternatively, where compliance with the minimum parking rates is not proposed, provide a robust performance-based Traffic impact assessment demonstrating compliance with PO14 of the Transport, access, parking and servicing code, supported by:
 - i) A parking demand assessment prepared by a suitably qualified traffic engineer,
 - ii) An assessment of likely on-street parking impacts within the surrounding street network, and
 - iii) Clear justification as to how the reduced parking provision will not result in adverse impacts on residential amenity, visitor parking availability or the operation of the road network.

Built to boundary wall

- 3) The northern built-to-boundary wall exceeds the maximum cumulative length of 15 metres and does not achieve Performance Outcome PO7 of the Multiple dwelling code, which seeks adequate building separation to protect visual and acoustic privacy, minimise reliance on screening, and maintain access to natural light, sunlight and

breezes. The extent of built-to-boundary development additionally limits opportunities for in ground deep planting and the establishment of large subtropical shade trees.

- a) Provide revised plans increase the side setback and incorporates additional building articulation to break up the built-to-boundary wall, enable meaningful deep-planting opportunities, and improve the interface with adjoining properties.

Ground landscaping and deep planting

- 4) The overdevelopment of the site has restricted the ability to achieve meaningful ground-level landscaping outcomes, including deep planting and screening to adjoining properties. Currently, the proposal does not demonstrate genuine ground-level landscape areas capable of supporting large subtropical shade trees and does not meet the performance outcomes of the Landscaping code. To address this item, submit:
 - a) Revised plans that demonstrate deep planting zones can accommodate shade trees of at least 5m in height (noting that trees in the order of 7–10m to complement the bulk and scale of the built form), with sufficient soil depth and minimum planting widths (generally at least 4m).
 - b) A minimum of one unobstructed deep-planting zone within the front boundary. Updated plans are to clearly indicate this area and confirm that it is not encumbered by services or any other obstructions.
 - c) Increased width of deep planting on the rear boundary which demonstrates how access for landscaping installation and ongoing maintenance will be provided.
 - d) Increased screening on the northern boundary to mitigate visual impacts, such as vertical screening or climber treatments.

Rooftop Garden

- 5) The proposed rooftop garden is shown as a shared space with private open space allocated to Unit 8 and does not meet the Schedule 1 – Administrative Terms definition of a Rooftop garden. Please clarify the intent of this area and address the following:
 - a) If the space is proposed as communal open space, demonstrate compliance accordingly, including confirmation that a minimum of 25% of the required communal open space is landscaped, and provide an additional deep planter (minimum 2.3 m × 2.3 m with 1200 mm soil depth) to accommodate a shade tree; or
 - b) If a rooftop garden is proposed, remove private open space from the rooftop level and demonstrate compliance with the administrative definition under Brisbane City Plan 2014 and Multiple dwelling code AO10.3/PO10; and
 - c) Provide a revised landscaped area calculation for private open space, planters and deep planting.

Planter irrigation

- 6) The proposed landscaping outcomes are overly reliant on container planting and do not provide adequate information to demonstrate long-term viability. To address this item, submit:
 - a) A revised Landscape concept plan showing planter locations, depths and soil volumes that comply with the minimum soil depths and volumes as per Table 1 of Landscape design planning scheme policy and Landscape works code; and

- b) Provide an irrigation strategy that outlines the requirements for the proposed stormwater harvesting and sufficient water storage methods, with reference to the Landscape works code (PO12/AO's, PO13/AO's and PO15/AO's) and the Landscape design planning scheme policy. This cannot be conditioned and subject to detailed design at the Operational works stage. The strategy is to outline:
- i. The proposed irrigation application rates for the onsite landscape areas within the development which is calculated using the methodology within Section 6.1 – Table 3 of the Landscape design planning scheme policy.
 - ii. The stormwater harvesting capacity and water tank storage requirements to effectively irrigate the onsite landscape areas which is calculated using the methodology within Section 6.3 – Table 5 of the Landscape design planning scheme policy.
 - iii. The proposed size, capacity and location of the water storage devices to service the irrigation requirements of this development.

Filling & Excavation

- 7) The Concept Earthworks Plan submitted in response to the information request indicates that excavation activities and retaining structures are proposed to extend to the northern property boundary, with no setback from the boundary alignment. In accordance with Performance outcome PO2 of the Filling and excavation code, retaining structures are required to be appropriately offset from property boundaries to enable construction, structural stability and subsoil drainage to be undertaken wholly within the subject site, without encroachment onto adjoining land. To address this item, submit:
- a) A revised Concept Earthworks Plans demonstrating that all proposed retaining walls along the northern property boundary are setback a minimum of 300mm from the boundary alignment, measured to the outermost extent of the retaining wall structure, including footings.
 - b) Sections and construction details confirming that all retaining wall footings, subsoil drainage and associated excavation works can be constructed and maintained entirely within the subject site, without reliance on adjoining properties.
 - c) Updated plans and levels clearly demonstrating consistency between the retaining wall offset and the proposed earthworks, cuts, batters and basement construction.
 - d) Note that if this change affects the parking and circulating aisle areas by narrowing them further, that they will require reassessment and certification.

Visitor Parking Location

- 8) The proposed visitor parking arrangement does not comply with Performance outcome PO15 of the Transport, access, parking and servicing code or section 7.3(5) of the TAPS PSP. Section 7.3(5) of the TAPS PSP requires that customer, visitor and service vehicle parking spaces are not located inside security fences, behind security doors, or in locations that are not readily accessible or visible to visitors.

The response relies on assumptions that visitors will be granted access through a secured gate by residents and does not demonstrate that visitor parking is independently accessible, convenient or clearly identifiable. To address this item, submit:

- a) Revised plans locating all visitor parking spaces outside of security fences and security doors, ensuring the spaces are permanently accessible to visitors without reliance on resident intervention, security access arrangements or private agreements, in accordance with section 7.3(5) of the TAPS PSP.
- b) Confirmation that visitor parking spaces are not located in areas used for servicing or heavy vehicle manoeuvring, and are positioned so as to be clearly visible, safe and convenient for visitors.

Bicycle Parking

- 9) The proposed bicycle parking arrangements do not comply with Performance outcome PO5 of the Transport, access, parking and servicing code or section 11.8 of the TAPS PSP. Section 11.8 of the TAPS PSP states that bicycle parking facilities are not to be provided within 1 metre of a vehicle manoeuvring or parking area, to ensure user safety and functional separation between cyclists and vehicles.

The proposed bicycle parking located within vehicle manoeuvring areas creates potential safety and operational conflicts. Further to this, rooftop bicycle parking is not supported as it is inconvenient for regular daily use and does not provide equitable or practical access for residents, particularly when required to traverse lifts, stairs or common areas. To address this issue, submit:

- a) Revised plans demonstrating that all resident and visitor bicycle parking spaces are located a minimum of 1 metre clear of any vehicle manoeuvring or parking area, in accordance with section 11.8 of the TAPS PSP.
- b) Revised bicycle parking locations that are convenient, safe, and readily accessible from the street and/or common pedestrian access points, without reliance on rooftop locations for primary resident bicycle storage.

Refuse Collection

- 10) A review of the Ground Floor Plan shows that the two-way aisle/ carriageway remains unchanged and has not been increased to 6.5m. The RCV blocks bin movement from the "Refuse" enclosure during servicing and offsetting the RCV does not allow B-85 vehicles to pass safely or efficiently.

The RCV is required to be off-set a minimum of 1.2m from the "Refuse" enclosure to enable bulk bins to be manoeuvred to the rear of the RCV. As such, the proposed 5.25m reduced carriageway trafficked by the RCV does not meet Performance outcome PO8 of the Infrastructure design code. To address this item, submit:

- a) Revised plans which clearly demonstrates the two-way aisle/ carriageway trafficked by the RCV is a minimum of 6.5m wide, with the RCV provided a minimum vertical operational clearance of 3.6m between the Ground FFL and lowest projection above for the entire 6.5m wide aisle/ carriageway for a length of 11.5m.
- b) Revised RPEQ certified swept path analysis which demonstrates a 10.24m rear loading RCV (as Per BSD-3008-2) as specified in Table 3 of the Refuse Planning Scheme Policy can safely and efficiently service the development. Ensure the swept path includes a vehicle specification table inclusive of (i.e., length, width,

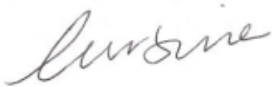
track, operational height, 6.00s lock-to-lock, 9.757m curb-to-curb turning radius etc).

The swept path analysis is required to clearly demonstrate the RCV standing/loading location is offset a minimum of 1.2m from the "Refuse" enclosure to enable bulk bins to be manoeuvred to the rear of the RCV during servicing and demonstrate that B-85 passenger vehicles can safely and efficiently pass the RCV.

Should you wish to amend the application to resolve these matters it is recommended that you stop the current period by written notice in accordance with the Development Assessment Rules.

Please phone me on the telephone number below during normal business hours if you have any queries regarding this matter.

Yours sincerely



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