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APPLICATION REF
A006866194

Our ref: STP4681
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Tuesday, 3 November 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 FURTHER ADVICE NOTICE

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

Dear Kellie,

I refer to the Further Issues notice received from Brisbane City Council dated 16 July 2026 in relation to the development application lodged 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 –** Amended subdivision survey plan (four lots)
- **Appendix B –** Updated traffic engineering assessment responding to Council's further advice
- **Appendix C –** Amended site-based stormwater management plan
- **Appendix D –** Operational works engineering layout plans
- **Appendix E –** Updated ecological and arboricultural response addressing vegetation retention

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Matter Raised:

Lot Sizes

1. The purpose of the rural can 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 may be supportable in this zone. Where the lot sizes do not achieve the minimum lot size of 14m x 20m the proposed development does not demonstrate compliance with PO1 of the

Subdivision code. Therefore, to achieve compliance with PO1 of the code the subdivision is to achieve PO1 a,b,c,d and e, the lots are to feature a useable shape able to accommodate the minimum rectangle dimension in Table 9.4.10.3.B. Increase the lot sizes to respond the environmental values, retain native vegetation and maintain the rural character.

(a) Amend the proposed reconfiguration to provide larger 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 subdivision be amended to provide lots with a minimum 14m x 20m rectangle under Table 9.4.10.3.B of the Subdivision code, on the basis that the layout does not demonstrate compliance with PO1. PO1 requires that lots, among other things, 'feature a useable shape able to accommodate the minimum rectangle dimension in Table 9.4.10.3.B and anticipated future development' and 'address development constraints'.

Table 9.4.10.3.B does not prescribe a minimum rectangle dimension for the Rural zone. Part 4 of the table, which sets dimensions for 'all other zones', lists the Rural residential zone (14m x 20m), the Medium and High density residential zones, the Centre and Mixed use zones and the Industry zones, but does not include the Rural zone. AO1.1 confirms this is deliberate: 'Where a zone is not identified in Part 4 of Table 9.4.10.3.B the relevant dimensions are either use or activity specific and no acceptable outcome is prescribed.' The 14m x 20m standard is the Rural residential zone benchmark, not one that applies to this Rural-zoned site, and compliance is properly assessed against PO1 directly.

Nonetheless, in an effort to have the proposal supported, the amended subdivision layout (Detail and Level Survey, Revision 02, 2 September 2026), submitted as **Appendix A**, amalgamates proposed Lots 13 and 14 to create four regular, rectangular lots of 587m2, 620m2, 658m2 and 823m2, each with direct frontage to Mount Petrie Road. Each lot is of a useable shape and size capable of accommodating a dwelling house, vehicle access and open space, and the amalgamation directly supports the native vegetation retention addressed at Item 4. The layout achieves PO1(a), (b), (c) and (e) of the Subdivision code and is consistent with overall outcomes 1(b), 2(a), 2(m) and 2(p) of the Rural zone code. The proposal is supported on this basis, and no further amendment to lot dimensions is required.

Matter Raised:

Traffic

2. It is noted that a RPEQ statement has been provided, however, the response incorrectly states that the northbound speed limit is 40km/h, this speed is only an advisory speed due to the crest, the actual speed limit is 80km/h. Using advisory speed limits for the crest is unsuitable for the basis of the sightline assessment and actual speed environment. The potential risk of right turns to and from the site remains. There is potential for significant speed differential for vehicles accessing the site and continuing traffic due to constrained entry. Swept paths have not been demonstrated for the required tight U turn movement to access the lots by vehicles larger than B99. Bin transfer path and access to indicative presentation locations has not been addressed. An indicative sufficient level verge of 9m x 1.5m for bin placement to be shown. The reporting incorrectly states that only 5 bins presented at a time (10 presented but 5 collected). The duration of collection is significantly longer for 5 bins over the current single bin. The report states that site servicing for larger vehicles will be on street without any demonstration of where or how, given the road speed and vertical crest - justified as only infrequent moving into or out of properties but does not account for general delivery on an ongoing basis. The marked-up plan provided has not addressed the restriction of right turn into the site.

   (a) Provide an RPEQ-endorsed Transport Impact Statement (TIS) that clearly addresses all the items raised above.

(b) Provide cross sections for the verge and proposed access easement routes, regrading of the verge and removal of existing retaining walls in the road reserve may assist in provision of safe site access

Response:

An updated Traffic Engineering Letter has been prepared by Modus Traffic and Transport Engineering (30 September 2026), endorsed by Harj Singh, Executive Director, RPEQ 22364, and is submitted as **Appendix B**. The assessment adopts the posted 80km/h speed environment and confirms approximately 225m of sight distance is available to northbound traffic approaching from the south, satisfying AO9.3 and AO11.1. The existing double continuous centre lines prohibit right-turn movements by law, and the crossover and internal driveway geometry has been configured, and confirmed by swept path analysis, so that right-in/right-out movements by a B99 vehicle cannot physically be made. The northern crossover now operates entry-only and the southern crossover exit-only, resolving the speed-differential concern. Servicing and refuse collection by vehicles larger than a B99 design vehicle has been relocated to an indented service bay on the Mount Petrie Road frontage, avoiding any need for a larger vehicle to manoeuvre within the site. A dedicated 9.0m x 1.5m level bin presentation area is shown, correctly sized for the eight bins associated with the four dwellings now proposed. On this basis the proposal achieves PO1, PO9, PO11, PO18, PO19 and PO20 of the Transport, access, parking and servicing code, and the access and servicing arrangement is supported.

Matter Raised:

Stormwater

3. The SBSMP provided appears to be proposing runoff to drain across all lot boundaries and is stating that those boundaries are a LPD, which is incorrect. The DRAINS modelling is required to reflect the majority of all lots being graded to drain to Mt Petrie Road and not across side boundaries, ensuring the earthworks levels over the majority of each lot will grade to the road, not to side boundaries as proposed. The discharge point in the verge of Mt Petrie Road would not be able to drain and would likely create unsafe channel depths/batters that would take up all the verge. It would need to be extended at least 30m downslope of the site to where the existing swale is clearly present and deeper. The roofwater drainage servicing the lots shall be contained within the new driveway (private roofwater), then directed at downslope point into road (outside of verge, or future verge) and extend down Mt Petrie Rd to discharge point into swale.

   (a) Provide an amended SBSMP that clearly addresses all of the items raised above.

Response:

Council identified that the stormwater management plan lodged with our Information Request response incorrectly described the site's side and rear boundaries as a lawful point of discharge, and sought earthworks graded to Mount Petrie Road, an extended discharge point into the established swale, and roofwater contained within the new driveway. AO4.2 of the Subdivision code requires development to provide 'a stormwater system in compliance with the standards in the Stormwater code', and PO2 of the Stormwater code requires the system to not 'adversely impact flooding or drainage characteristics of premises which are up slope, down slope or adjacent to the site'.

An amended Site-Based Stormwater Management Plan has been prepared by Bravo Consult (Project 3655-SMP-001, Version 1, 9 September 2026), certified by Isaac Scot, RPEQ 16797, and is submitted as **Appendix C**, supported by the operational works layout plans at **Appendix D**. The earthworks levels over the majority of each lot now grade to the shared driveway and Mount Petrie Road frontage rather than the side boundaries, and roofwater is piped within the shared driveway easement and directed to a downslope discharge point into the existing swale. Two lawful points of discharge are nominated, both in the Mount Petrie Road verge, and the upstream end of the existing swale is extended to meet the proposed discharge point so flows are

conveyed to where the swale is established and deeper. DRAINS modelling using the Initial Loss Continuing Loss method confirms the total post-development peak flow rate is at or below the pre-development rate at every design storm event, and that the additional flow entering the swale produces depth-velocity products below 0.4m2/s, which does not create unsafe conditions or exceed the swale's capacity. The proposal achieves PO2, PO3 and AO3.3 of the Stormwater code and AO4.2 of the Subdivision code, and no further amendment is required.

Matter Raised:

Ecological values

4. No attempt has been made to retain native vegetation within the High Ecological Significance (HES) and the Koala habitat mapped area of the Biodiversity areas overlay within the site. The plan proposes to retain one mango tree within the site, however, this is not within the HES mapping and is not a Non Juvenille Koala Habitat Tree. The site is located in an area of the landscape that facilitates fauna and Koala movement north through Belmont Hills Reserve south through various vegetation patches. Therefore, native vegetation along the southern boundary must be retained to achieve a connection to these areas and provide compliance with PO4 and PO7 of the Biodiversity areas overlay code. A revised lot layout is required, it is suggested that lot 14 and lot 13 are amalgamated to retain existing vegetation along the southern boundary. To ensure trees located along the southern boundary are accurate a survey accurate tree plan must be provided (accurate to +/- 100mm) in accordance with the Biodiversity areas planning scheme policy.

   (a) Provide an updated lot layout to ensure the retention of vegetation along the southern boundary of the site.

   (b) Provide an updated tree survey using survey accurate methodology along the southern boundary (accurate to +/- 100mm).

   (c) Provide a plan overlaying the updated tree survey over the updated engineering plans (e.g. filling and excavation).

   (d) Amend the proposed development to retain at a minimum tree #1002, #995, #997. #993, #1016 as they meet one or more criteria of 'significant vegetation' as described in Section 2 of the Vegetation PSP and contribute to local landscape character.

   (e) If any works encroach into the Notional Root Zone of retained trees a report from a qualified arborist (minimum AQF Level 5) must be provided to demonstrate no negative impacts on the long-term health of the trees. Mitigation methodology must be provided if impacts are proposed.

Response:

Council identified that the originally proposed layout did not retain native vegetation within the High Ecological Significance and Koala habitat area sub-categories along the southern boundary, and specifically sought the retention of trees #1002, #995, #997, #993 and #1016, suggesting the amalgamation of proposed Lots 13 and 14. PO4 of the Biodiversity areas overlay code requires ecological features and koala habitat trees within the High Ecological Significance sub-category to be 'protected, conserved and restored to ensure the area's long-term viability', and PO7 requires development to protect 'the maximum number of non-juvenile koala habitat trees' and to consolidate and connect areas of habitat.

The proposal has been amended in direct response to this matter. A Further Advice Response has been prepared by 28 South Environmental (30 October 2026), supported by a revised Arboricultural Impact Assessment prepared by Independent Arboricultural Services (Adam Kriedemann, AQF Level 5, checked by Mick Maher, AQF Level 5, Revision 4, 20 October 2026), submitted as **Appendix E**. The number of proposed lots has been reduced from five to four by amalgamating proposed Lots 13 and 14, specifically to maximise retention of vegetation along the southern boundary. The updated Tree Retention Plan, based on survey-accurate tree

locations (accurate to at least +/-100mm), confirms that trees #1002, #995, #997, #993 and #1016, each named by Council, are now retained, together with a further fourteen trees. The Arboricultural Impact Assessment sets out tree-specific protection measures for each retained tree, including pier-and-beam retaining wall design, low-pressure water excavation within tree protection zones, structural soil backfill and ongoing Project Arborist supervision, to protect the long-term health of the retained trees. The understorey and groundcover within the HES mapping comprises planted garden species and common disturbance weeds rather than native vegetation, so no native vegetation offset is triggered by the works proposed. The amended layout achieves PO4 and PO7 of the Biodiversity areas overlay code.

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.

Kind regards,



Alexander Steffan | Director
Steffan Harries
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