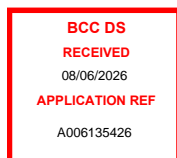


8 June 2026

Job Ref: B3602-A7-DA19



Brisbane City Council
GPO Box 1434
BRISBANE QLD 4001

Att: Development Assessment (Justin Lynham)
via DSPlanningSupport@brisbane.qld.gov.au

Response to Further Advice – 62 Kraft Road, Pallara QLD 4110 – Council Ref: A006135426

Dear Justin,

We refer to Council's Further Advice dated 16 January 2026 regarding the abovementioned application.

Accordingly, we hereby provide all the information requested. In support of our response, please find **enclosed** the following documents for assessment:

Attachment A.	Updated DA Form 1 prepared by JFP Urban Consultants
Attachment B.	Updated Reconfiguration Plan prepared by JFP Urban Consultants
Attachment C.	Updated Building Envelope Plan prepared by JFP Urban Consultants
Attachment D.	Updated Engineering Concept Plans prepared by JFP Urban Consultants
Attachment E.	Updated Site based Stormwater Management Plan prepared by JFP Urban Consultants
Attachment F.	Updated Code Responses prepared by JFP Urban Consultants
Attachment G.	Signed Downstream Owner Consents for lawful point of discharge

In response to the request, and as further detailed below, we note that the proposed development has been amended as follows:

1. To enable the compliant discharge of stormwater in the site, the rearmost portion of the site that contains an ecological corridor has been converted to a drainage reserve.
2. The number of proposed residential lots has increased from 24 to 26, with 9 of the 26 proposed lots (34.6%) being less than 400m², triggering Performance Solutions against PO12 of the Lower Oxley Creek South Neighbourhood Plan Code and PO22 of the Subdivision Code. This is to ensure consistency with other recent applications in the immediate area. An updated response to the Lower Oxley Creek South Neighbourhood Plan Code and Subdivision Code is enclosed with this response as Attachment F.

In accordance with Schedule 2 of the *Planning Act 2016* (the Act) and Schedule 1 of the *Development Assessment Rules*, we confirm that the above changes do not:

- result in a substantially different development;
- seek approval for prohibited development;
- require the application to be referred to any additional referral agencies;
- change the type of development approval sought; or
- require impact assessment for any part of the changed application, if the original application did not involve impact assessment.

Our responses to the outstanding issues are as follows:

Stormwater

1. Connection to the trunk drainage requires permission from downslope owners for construction as well as it will require easement in favour of Council for underground drainage purposes. It should be confirmed that the adjacent owners are provided with the easement plans and that they understand both the obligations.
 - a. Provide amended plans in accordance with PO3 of the Stormwater code that show confirmation from adjacent landowners about their obligations towards provision of easement for underground SW.

Response

The delivery of the proposed development is currently dependent on the delivery of Council's trunk stormwater infrastructure, which traverses the adjoining 70-78 Kraft Road where a development application has been lodged (BCC ref: [A006952466](#)). This application incorporates the trunk stormwater alignment in a 20m wide road corridor whilst also proposing a new road connection from the subject site to the trunk stormwater alignment.

Downstream consent from the relevant owners may not be required depending on the timing of the construction of their development and the trunk infrastructure. It is anticipated that the proposed development will be delivered once trunk stormwater infrastructure is provided. With this consent, approval of the subject application can proceed based on reasonable and relevant conditions. Notwithstanding this and to advance the subject development application, consent has been sought and obtained from the owners of 70 Kraft Rd for a lawful point of discharge and is enclosed.

2. Concept LGIP stormwater details (plans and long-section) for the proposed trunk drainage needs to be provided as these will be conditioned if this application is approved. It should be noted that Council has obtained culverts for Sweet Road drainage. Costings should also be submitted.
 - a. Provide amended plans in accordance with PO1 of the Stormwater code that show concept design for SW trunk works and its costing.

Response

Please refer to the enclosed updated Engineering Concept Plans prepared by JFP Urban Consultants for the conceptual design of the trunk stormwater from Kraft Road to the Sweets Road outlet. Refer to Appendix J of the enclosed updated Site based Stormwater Management Plan prepared by JFP Urban Consultants for preliminary costings.

3. A stormwater easement for major flows through a freehold lot does not comply with the Stormwater code and are not suitable on residential lots as garden sheds/gardens are typically build over such easements. Additionally, the lot will require freeboard to the flows in this swale. Also, swale through verge cannot be constructed as proposed.
 - a. Provide amended plans in accordance with PO1 of the Stormwater code that addresses the issues raised above.

Response

In response to this issue, the previously proposed easement has been changed to a dedicated drainage reserve. The 2% AEP water levels in the swale range from 18.2m AHD to 17.4m AHD. The adjacent lots 13 and 14 pad RLs 18.60 achieve the minimum 0.3m freeboard, ensuring compliance with the relevant flood immunity standards.

4. The Kraft Road frontage piped stormwater drainage (at existing headwall) is proposed in the verge. Stormwater chamber should be within the road pavement.

- a. Provide amended plans in accordance with PO1 & PO3 of the Stormwater code that show Kraft Road underground drainage to run within the proposed pavement.

Response

The underground drainage has been realigned to run under the pavement. Refer to the enclosed updated Engineering Concept Plans prepared by JFP Urban Consultants for further details.

5. An overland flow easement is required in favour of Council over towards the rear of proposed Lot 12. This should be shown on ROL plan.
 - a. Provide amended plans in accordance with PO1 of the Stormwater code & PO18 of the Flood overlay code that show an easement for overland flow towards rear of Lot 12.

Response

The easement at the rear of the site has been changed and is now proposed as a drainage reserve as per the enclosed updated Reconfiguration Plan prepared by JFP Urban Consultants. This drainage reserve is contiguous to the adjoining open space to the rear of the site, providing connectivity options in the future.

Hydraulics

6. Flood model must be amended to include:
 - The trunk pipe on Laxton Road must connect to the existing concrete channel via a new large inlet to capture as much of the 10% AEP flow as possible. Provide model inlet capture details on that inlet.
 - The impact on Laxton Road as a result of this development needs to be reduced as the access to the site is through this road connection. This road should provide a suitable standard of service. A new inlet may help reduce the impacts.
 - Figure 9 in Flood Study shows inactive polygons over Council owned 38 Kraft Road. This area should not be assumed to be filled in the modelling as this is park/ environmental area. Additionally, polygons on the 121 and 97 Sweets Road developments should be consistent with that proposed in development proposals.
 - The sensitivity scenario shall include AR&R climate change provisions, especially as it is downslope of a dam. This could be a simple factoring up of 1987 IFD used in the hydrology:
 - a. Provide amended flood model in accordance with PO7 & PO17 of the Flood overlay code that incorporate issues raised above.

Response

Please refer to section 2.1.2 of the enclosed updated Site based Stormwater Management Plan prepared by JFP Urban Consultants which responds to this item.

Traffic

7. It is noted that the northwest – southeast road extensions results in a straight road segment of approximately 155m between proposed Lot 11 and the neighbourhood road over 78 & 86 Kraft Rd. It is recommended that the minor road intersection within this development be treated with a kerb extension buildout similar to that at the nearby Escalade Cct site to moderate vehicle speeds, to be more consistent with the maximum 120m between speed management features specified in the IDPSP. The speed management treatment can be achieved without additional land dedication for the road network.

- a. Provide amended plans in accordance with PO3 of the Road hierarchy overlay code that show a LATM at the minor road intersection.

Response

Please refer to the enclosed updated Engineering Concept Plans prepared by JFP Urban Consultants which include details of the requested kerb extension buildout to moderate vehicle speeds.

8. Manoeuvring areas for an RCV to turn around at the northern and southern interim road terminations need RPEQ endorsed swept paths demonstrating practical manoeuvring at the temporary access easement on Lot 12. Furthermore, it appears that RCV has to reverse more than 20m to turn around after serving Lot 16. A similar temporary access easement at the south is also required for the RCV turn around. Both north & south turn around easements should be purpose built, separate to lot crossovers.
 - a. Provide amended plans in accordance with PO19 of the TAPS Code that show separate turn around accesses on easement for RCV at both northern & southern road terminations.

Response

The south-eastern road termination is proposed to be further extended as part of the current DA over 70 Kraft Road (BCC ref: [A006952466](#)). Once that road is extended, a temporary turnaround over Lot 15 will not be required. If the Applicant for the adjoining development has not undertaken plan sealing, conditions can be imposed and plans marked up requiring a temporary turnaround over Lot 15, ensuring all vehicle manoeuvring occurs in the subject site. It is acknowledged that this requirement is unlikely as the delivery of the proposed and adjoining developments is dependent on the delivery of Council's trunk stormwater infrastructure. Once the trunk stormwater infrastructure is delivered, it is anticipated that the proposed development will occur at the same time or after the adjoining development.

It is noted that the number of proposed residential lots has increased from 24 to 26, with 9 of the 26 proposed lots (34.6%) being less than 400m². As the proportion of sub-400m² lots exceeds the 5% maximum specified in AO12.3 of the Lower Oxley Creek South Neighbourhood Plan Code, Performance Solutions are triggered against PO12 of the Lower Oxley Creek South Neighbourhood Plan Code and PO22 of the Subdivision Code. This change is consistent with other recent applications in the immediate area, including [A006952466](#) at 70-78 Kraft Rd and [A006935362](#) at 69-73 Kraft Rd & 136-152 Laxton Rd which are proposing 33% and 30% of their lots as under 400m², respectively. The proposed share of sub-400m² lots for these applications was not raised as a concern by Council officers at the Information Request stage. We note that the proposed layout will enable the provision of a variety of 1-2 storey housing types in an urban landscaped setting with compliant setbacks, private open spaces and opportunities for landscaping. We note that the layout is designed in a way that a single lot type does not appear to dominate and concerns in relation to repetition in design will be alleviated as the Applicant will design and construct all future dwellings which will have a variety of heights and facades. A full response to Performance Outcomes is in the enclosed updated Code Responses prepared by JFP Urban Consultants.

As there is an increase in the number of lots being proposed, we note that this constitutes a change to the application during the assessment period as per s52(1) of the Planning Act 2016. In this instance, we believe that the change is considered a "minor change" under s52(3) of the Act, in that it does not result in substantially different development. As such, we understand that the development assessment process will not stop as a result of this change.

This correspondence and attachments represent a response to all the information requested. We trust the above and enclosed information satisfactorily addresses the request and we look forward to receiving Council's draft conditions following public notification of the application. Please do not hesitate to contact the writer on 07 3012 0100 should you have any questions.

Yours faithfully,

A handwritten signature in black ink that reads 'James Collie'.

JAMES COLLIE
TOWN PLANNER
JFP URBAN CONSULTANTS

Cc: Applicant