23rd October 2026

BCC DS
RECEIVED
29/10/2026
APPLICATION REF
A007057874

Urbicus Ref: URB26-332
Primary Contact: Henry Watson

Chief Executive Officer
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

Email: DSPlanningSupport@brisbane.qld.gov.au

Attention: Steve Zhou, Urban Planner – Planning Services North

Applicant response to an information request under Section 13 of the Development Assessment Rules
Council reference: A007057874
Property details: 46 Daniells Street, Carina QLD 4152 (Lot 2 on RP73004)

In accordance with section 13.2 of the Development Assessment Rules, I wish to advise that I am providing:

☐ **all** of the information requested

☒ **part** of the information requested

In support of our response the following documents are provided:

1. Maven Request for Information Response Letter;
2. Video – walking route from the Site to the centre: https://youtube.com/shorts/e-EL2LMLjN8 ;
3. Video – walking route from the centre to the Site: https://youtube.com/shorts/a-8EdOfMPAk

This response addresses Item 1 in full and sets out the applicant's position on Items 2 and 3, supported by the attached civil engineering response. The balance of the engineering detail requested under Items 2 and 3 will be provided in a further response within the applicant response period.

We address the specific items raised in Council's "Information Request" as follows:

1	**Proposed Lot size(s)**
	While it is acknowledged that the justification provided with this application outlines a walking distance of 250m from the nearest centre and that the proposed lot configuration can achieve the minimum rectangular dimensions, average lot width and average frontage requirements outlined under Table 9.4.10.3 of the Subdivision Code, the application has not satisfactorily demonstrated how the proposed lots, which are below the minimum area of 400sqm meet the purpose and relevant performance outcomes of the Subdivision code. In particular, limited information has been provided with regards to the existing nearby infrastructure, services and facilities needed by a future Dwelling house as required under 9.4.10.2 Purpose 2b.iii of the Subdivision code. Further, Council's assessment indicates that the safe and reasonable walking distance between the subject site and the nearest centre is approximately 430m. Provide further information demonstrating the site's proximity to nearby infrastructure, services and facilities that may support future dwelling house, having regard to the relevant provisions of the Subdivision code.

Response

Walking distance to a centre

City Plan provides for lots of 300m² in the Low density residential zone where any part of the lot frontage is within 300m walking distance of any part of the lot frontage of a site or sites in a zone in the centre zones category with a combined site area of more than 2,000m² (Table 5.6.1, as amended by the More Homes, Sooner – Low-medium density residential design amendment, City Plan v37.00/2026).

Walking distance is the distance between two places, measured from reasonable pedestrian access points and along roads with verges, off-road pathways or other reasonable pedestrian connections.

It excludes obstacles such as waterways, railway lines and private land.

The 300m threshold commenced on 18 September 2026, after the Application was properly made. Section 45(8)(a) of the *Planning Act 2016* allows Council to provide weight to an assessment benchmark after an application is properly made.

The nearest centre is the (Neighbourhood centre) zoned land at 881 Old Cleveland Road (Lot 3 on RP217455), which accommodates IGA Carina and associated food and beverage tenancies and has a site area well in excess of 2,000m² (5,341m²).

Both proposed lots are 336m².

Council's assessment indicates a walking distance of approximately 430m. We understand this is based on a route that diverts west to cross Old Cleveland Road at the signalised intersection with Gallipoli Road and Orana Street. Our measurement of that route using Council's City Plan online mapping tool is approximately 399m (Route A, Figure 1).

The direct route is approximately 258m (Route B, Figure 2). Both routes are identical from the Site, along Daniells Street and through Belmont Recreation Reserve to Old Cleveland Road. They differ only in where Old Cleveland Road is crossed, as summarised in Table 2.

Table 2 Comparison of walking routes

	Route A – via signals (Figure 1)	**Route B & C – direct (Figures 2 & 3)**
Route	Daniells Street and Belmont Recreation Reserve to Old Cleveland Road, west along the northern footpath, across Old Cleveland Road at the Gallipoli Road / Orana Street signals, then to the centre frontage	Daniells Street and Belmont Recreation Reserve to Old Cleveland Road, across Old Cleveland Road in two stages via the central median, then across the service road to the centre frontage
Distance	Approximately 399m	Approximately 258m & 290m
Within 300m	No	Yes

Figure 1 **Route A – via the Gallipoli Road / Orana Street signals (approximately 399m)**



Figure 2 Route B – direct route (approximately 258m)



Figure 3 Route C – Another direct route (approximately 292m)



Route B & C are lawful pedestrian routes

Route B & C are wholly within public land, being the Daniells Street and Old Cleveland Road road reserves and Belmont Recreation Reserve, and does not cross a waterway, railway line or private land.

Under sections 230 and 234 of the *Transport Operations (Road Use Management—Road Rules) Regulation 2009*, a pedestrian may cross a road away from a crossing provided they are not within 20m of a pedestrian crossing, and they cross by the shortest safe route.

Routes B & C crossing points is approximately 140m east of the signalised crossing at Gallipoli Road / Orana Street and approximately 100m west of the Narracott Street intersection (Figure 4). The crossing is therefore lawful. Nothing City Plan definition of walking distance does not specify a route must use a signalised crossing.

Routes B & C are reasonable and safe pedestrian route

The crossing of Old Cleveland Road on Route B & C are reasonable and safe for the following reasons (refer Figure 4):

- **Two-stage crossing with a central refuge island.**

  Old Cleveland Road is a divided road with a wide, landscaped central median of approximately (7m-10m). Pedestrians cross one carriageway at a time, only need to judge traffic from one direction, and have a safe waiting area between stages. Each carriageway is approximately (7m) wide and can be crossed in around (9–12) seconds at a typical walking speed.

- **Good sight lines.**

  Old Cleveland Road is straight and generally flat at the crossing point. Pedestrians and drivers have clear, generally unobstructed visibility in both directions, well beyond the distance needed to identify a safe gap in traffic. Noting that this can be confirm within the video provided.

- **Regular gaps in traffic.**

  Traffic approaching the crossing point is regulated by the signalised intersection at Gallipoli Road / Orana Street and by the Narracott Street intersection. Vehicles are released in groups, creating regular gaps in each direction.

- **Low-speed destination.**

  On the southern side, pedestrians step from the carriageway onto a grassed verge and then a service road and parking area in front of the centre. This is a low-speed environment rather than an arterial road edge.

- **Demonstrated in practice.**

  The route has been walked and filmed in both directions on a Friday at approximately 1:00pm (Documents 2 and 3). The videos show Old Cleveland Road being crossed in two stages using the central median, without the need to divert to the signals.

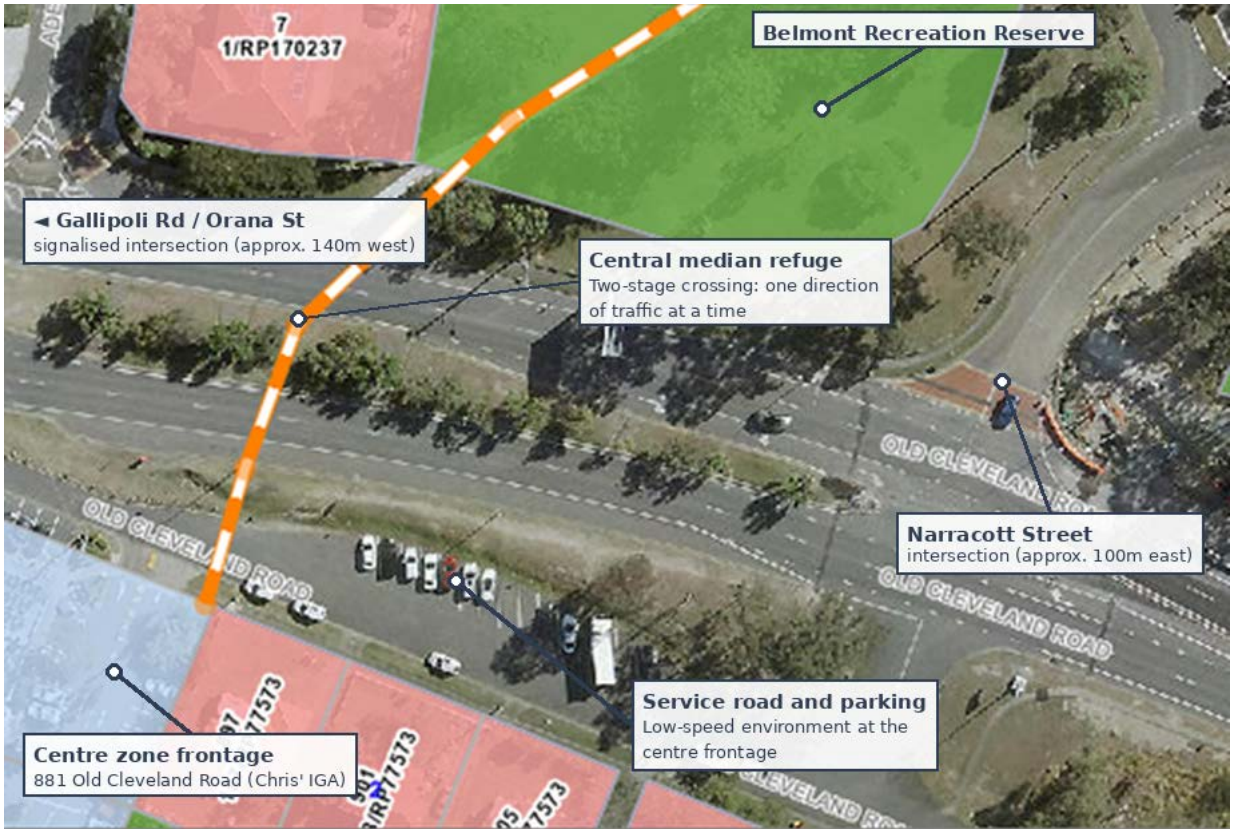
- **Consistent with the Road Rules.**

  Pedestrians are required to cross by the shortest safe route. Route B & C are the shortest route between the Site and the centre. This reflects how future residents will realistically walk to the shops.

Route A remains available to any resident who prefers to use the signalised crossing, at an additional total distance of 399m.

Noting that this is still consistent / complaint with walking distance measures to a Key Location.

Figure 4 Crossing of Old Cleveland Road



Source: Brisbane City Plan 2014 online mapping (annotated by Urbicus)

Infrastructure, services and facilities (Purpose 2(b)(iii))

The Site is well located in relation to the infrastructure, services and facilities needed to support a future dwelling houses on each proposed lot. Refer to the table below.

Table 3 Nearby services and facilities

Service / facility	Location	Approx. distance from Site
Belmont Recreation Reserve – park, playground, shared pathways and picnic facilities	Southern end of Daniells Street	Less than 100m
Chris' IGA Carina – supermarket (open 6am–10pm, 7 days) and café	881 Old Cleveland Road	258m walking (Route B)
Bus stop – Old Cleveland Rd near Gallipoli Rd (stop 37)	Old Cleveland Road	260m*
Clem Jones Centre – aquatic centre, gym and café	56 Zahel Street	300m*
Carina Leagues Club	1390 Creek Road	490m*
Carina State School	1413 Creek Road	530m*
Carina Community Centre	1 Edmond Street	560m*
Carina Library	Mayfield Road / Nyrang Street	700m*
Old Cleveland Road Clinic and Carina–Carindale Medicare Urgent Care Clinic	805 Old Cleveland Road	720m*
TerryWhite Chemmart Carina Day & Night Pharmacy	834 Old Cleveland Road	820m*

** Straight-line distance from the Site, rounded to the nearest 10m.*

In summary, the Site is approximately 258m walking distance from centre zoned land via a lawful, direct and reasonable route, and is well served by existing infrastructure, services and facilities.

The proposed lots are consistent with the small lot provisions of City Plan and achieve Purpose 2(b)(iii) and the relevant performance outcomes of the Subdivision code.

No change to the proposed lot layout is required.

Engineering

2	**Earthworks – Verge**
	It is acknowledged that the materials supplied with this proposal demonstrates that the earthworks and retaining structures is in response to the existing topography to create useable lots, however, the proposed development does not address the existing non-standard verge slope as required under PO4 of the Infrastructure design code. The existing verge is required to be upgraded to comply with the road corridor design and streetscape locality advice standards within the Infrastructure design Planning scheme policy (PSP) stated under AO4 allowing suitable driveway grades, verge profile to provide for refuse bin collection points and ensure safe access for pedestrians as required under PO4 of the Infrastructure design (ID) code. Provide engineering drawing/s, prepared by a RPEQ as required by the ID PSP Chapter 1, of proposed earthworks and retaining walls for the development, and ensure the following items are addressed:
(a)	Demonstrate the majority of the verge along the frontage of the site will have maximum grades across the verge generally as per Council standard drawing BSD-2024. i. It is noted that the lowered verge will need transitioning to verges on either side of the site frontage, and batter slopes to existing verges should not exceed 1:10. ii. Amended drawing/s are to indicate depths of existing services in the verge and nominate lowering of service/s if required. iii. The grades of the driveways from the carriageway, across the verge, and to the proposed building pads of the Lots are to be shown on the amended drawing/s and comply with BSD-2024. iv. Consider providing the access driveways as 'Grid crossings and Invert modifications' as per BSD-2023 to assist in grade transitions across the verge and into the Lots.

Response

The applicant has engaged Maven to review Council's verge requirements. The full assessment / response will be provided at a later stage. However, we confirm the following:

- The existing verge along the Site frontage is grassed with a grade of approximately 1 in 4 (25%). There is no footpath on this side of Daniells Street; an existing concrete footpath is provided on the opposite side.

- An Urban Utilities gravity sewer main (LS35065, 150mm vitrified clay) runs beneath the verge and the proposed driveways. Existing cover at the driveway location is approximately 1.15m, which already equals the 1,150mm minimum required by clause 2.5.7.4 of the Urban Utilities Technical Guidelines where subject to vehicle loading (Item 2(a)(ii)).

- Regrading the verge to BSD-2024 grades would reduce cover over the sewer main below the Urban Utilities minimum. As a gravity main, it cannot be lowered to compensate.

- Regrading would also likely require relocation or lowering of electrical and telecommunications conduits, could affect the existing power pole near the southern boundary, and would require lower building pads with additional cut and retaining, reducing the usable area of the lots.

- Consistent with Item 2(a)(iv), grid crossings are proposed for the new driveways in accordance with BSD-2023 to manage the grade transition across the existing verge. This is the same arrangement used by the existing dwelling.

AO4 is one way of achieving PO4 of the Infrastructure design code. The non-standard verge is an existing condition and is not created by the development. Retaining the existing verge achieves PO4 because:

- **PO4(a):** Pedestrians are served by the existing footpath on the opposite side of Daniells Street, and lowering the verge along this single frontage would not create a connected pedestrian path. Vehicle access is provided by grid crossings, consistent with the existing dwelling;

- **PO4(b):** The verge accommodates the existing sewer, water, electricity and telecommunications services. Retaining the existing profile protects these services, whereas regrading would compromise the required sewer cover;

- **PO4(c):** The grassed verge has been maintained in its current form and will continue to be maintainable.

Requiring the verge to be regraded would compromise existing utility infrastructure without delivering a connected pedestrian outcome.

In our view, it would be an unreasonable imposition on the development and is not reasonably required.

3	**Earthworks – Retaining walls**
	Whilst it is acknowledged that the currently proposed retaining walls presenting to the site frontage may be considered consistent with existing retaining walls, as part of lowering the verge demonstrate proposed retaining walls presenting to the sites front boundary will need to be a maximum 1.0 metre in height, offset, or stepped at 1m vertical to 1m horizontal units as required to comply with the Filling and excavation code.
(a)	Ensure the concept earthworks drawing/s include cross-sections at appropriate locations along all site boundaries to show the interface with adjoining land.
(b)	The drawing/s are to show levels at the top and bottom of retaining walls and that the walls (including associated drainage) will be wholly contained within the sites property boundaries.
(c)	Demonstrate the location of proposed mobile garbage bin collection points with suitable grades along the verge.

Response

Item 3 is premised on the verge being lowered. As set out under Item 2, the existing verge is to be retained, and the frontage retaining walls therefore remain as proposed. Council has acknowledged that these walls are consistent with the existing retaining walls along the frontage.

In relation to the specific matters raised:

- **Items 3(a) and 3(b):** Concept earthworks cross-sections along all Site boundaries, including top and bottom of wall levels can be provided at a later stage / conditioned as a part of the approval.

- **Item 3(c):** Refuse bins will continue to be collected from the Daniells Street verge, consistent with the current arrangement for the existing dwelling. Bin collection points for each lot will be shown on the further response drawings.

As the walking distance determines the appropriate assessment pathway for the Application (i.e. Code Assessable vs Impact Assessable), we would welcome Council's confirmation of its position on Item 1 before the applicant finalises the remaining engineering information.

Should you have any queries please contact our office.

Yours sincerely



Henry Watson
Senior Associate Urban Planner
M: 0481 333 914
E: henry.w@urbicus.com.au