



Dedicated to a better Brisbane

17 October 2025

Red Capital Investment No 10 Pty Ltd
C/- Steffan Harries
34 Old Cleveland Road
STONES CORNER QLD 4120

ATTENTION: Alexander Steffan

Application Reference: A006554828
Address of Site: 109 BECK ST PADDINGTON QLD 4064

Dear Alexander

RE: Further advice

While your response to Council's further advice letter received on 21 August 2025 addresses several key issues, numerous matters raised in Council's previous correspondence on the application remain unresolved.

1. Reconfiguration of Lot (ROL)

- a) The further issues response identifies the proposed ROL may be accommodated, however outlines that volumetric lots, common property and/or easement arrangements will be required.
 - i. Provide revised subdivision plans to include the volumetric lots, common property and/or easements. Where a volumetric common property is sought, it must extend to the underside of any building suspended over/near the overland flow path (to ensure undercroft areas can convey floodwaters), or the PMF level, whichever is higher.
- b) The proposed subdivision plan dated 30 July 2025 prepared by the Architect is not consistent with the plan of the same drawing number in the Flood Report. The subdivision plan is required to clarify all areas of common property for each level, i.e., both the ground level, (including the undercroft) and the upper level (the access aisle/unit level).

The proposed subdivision plan should be prepared by a QLD registered cadastral surveyor to accurately show each of the levels of development, to be presented in building format plan standard, and to also provide a proposed height restricted easement plan. These plans will support the plan sealing process. Should the requested subdivision plans not be provided, the ROL component of the proposal should be removed.

2. Flooding

The proposed civil works plans require further information and amendments to be provided and subsequently, the Flood Report is to be updated to address the following items.

- a) The earthworks plans must clearly show the area of cut/fill, the volumes of cut/fill, dimensioned cross-sections and retaining wall heights etc, regardless of if the works are outside of the 2% AEP area.
- b) Update the proposed stormwater design with an internal drainage network which provides 150mm diameter connections to each unit, a foul-water line connection and connection of the driveway drainage, all directed to the lawful point of discharge, i.e., the road gully in Boys Street.
 - i) Provide details for proposed ground surface stability treatments which will drain freely to on-site connections to the external stormwater networks.
- c) The architectural plans show multiple structural columns and/or walls (possibly firewalls) within the undercroft area. The presence of the 3 x 1500 stormwater barrels diagonally across the site also introduces another complexity into the building's structural design in the vicinity of units 5, 6 and 7 as the 7.0m wide easement will require deep beams to support these unit dwellings which could impact on the current minimum 8.7m AHD level.

The Flood Report modelling must be updated to include preliminary structural support designs of slabs / beams / columns and support walls – including firewalls (if they are determined to be required by a Building Certifier) and an allowance for services slung beneath the floor slab. The Flood Report is to be amended to include:

- i) Updated flood modelling to include structural obstructions in the flowpath.
- ii) RPEQ Structural engineers' advice/concept structural plan with preliminary dimensions of structural obstructions within the flowpath, and this plan is to also be discussed within the flood report.
- iii) Advice from building certifier regarding requirements for fire-walls to ground level.
- iv) Amend the proposed architectural plans as required.

3. Removal of eastern block wall

The existing eastern block wall has mitigated protection for the adjoining development for many years and its removal will create an adverse impact / actionable nuisance on the neighbouring dwelling. A similar height structural wall is required to mitigate flood impacts along the eastern boundary to the downstream neighbour's property as currently provided by the existing unregulated wall. The information provided in the current version of the Flood Report indicating that wall's removal will return the flow to natural state, which currently either passes through the holes in the wall or overtops in a major event is not accepted.

4. Crash barrier wall

The amended proposal now includes a 190mm wide crash barrier wall and a 5.7m parking aisle.

- i) The proposed 190mm wide block wall must be confirmed by a RPEQ (structural) engineers' certification as being of typical size for a crash barrier wall of this type that is structurally designed so that it will not shatter on impact. Provide RPEQ structural advice on the proposed width of this wall. This is required as the ultimate parking aisle width will impact on the already very tight proposed aisle width if the walls ultimately have to be larger than currently proposed.

5. Parking aisle deck width, swept paths and access to garages

The response provided has not addressed all of the issues raised. The traffic engineering response does demonstrate the parking aisle width is supported by the RPEQ. However this is not correct as the previous proposed parking aisle width was in line with AS2890.1 with a width of 5.8m.

The current drawing shows the apron width and parking aisle width has been reduced from 5.8m to 5.7m. This does not comply with the required standards for two-way aisles, i.e., ref: TAPS PSP Section 7.4.4 requires 6.2m width nor with AS2890.1.

The proposal also shows the proposed double garage door openings are 5.2m wide whereas the TAPS PSP requires a minimum 5.3m wide, ref: TAPS PSP section 7.8.3. The parking aisle turning templates are also to maintain a minimum 300mm clearance to the crash barrier wall.

- i) The RPEQ is to demonstrate, with swept path diagrams, that the design vehicle (B85) can manoeuvre into garage parking space with the other space full. The B99 worst case scenario is to also be demonstrated to ensure it is possible for a B99 vehicle to use the garage albeit with multiple turns.
- ii) The traffic engineer's memo of 26 November 2024 (Modus) is to be updated to include:
 - updated architectural drawings;
 - supporting swept paths to demonstrate a minimum 5.8m parking aisle and 5.3m garage door opening;
 - a compliant parking aisle width to the AS2890.1 with a minimum 5.8m width;
 - RPEQ's written signature (not digital format) if all proposed performance solutions to the TAPS Code / PSP are to be considered for acceptance.

6. Streetscape verge width

The requested changes for the external concrete pedestrian footpath and to survey the frontages to establish if there is a minimum verge width (to 3.75m) has been requested to be conditioned. This is not accepted; the verge width cannot be conditioned as it may impact the development layout.

- (i) Provide a registered cadastral surveyor land survey plan showing the existing verge widths along both frontages to determine if the required minimum verge width of 3.75m exists, or if a land dedication is required to meet this requirement.
- (ii) The proposed drawings must also be amended to include details of the required Streetscape Hierarchy Overlay Code as a Neighbourhood Street – NS1, as per the Infrastructure Design PSP Table 3.7.4.4.1.A to provide 1.80m wide footpaths to both frontages, with links to the intersection pedestrian ramps.

7. Landscaping

- a) Proposed side boundary planting dimensions are too narrow and too removed from the elevated deck to achieve the intended landscaping outcomes. Landscaping in the proposed location will also not be accessible for viable maintenance.
 - i) Remove the proposed 500mm wide garden bed along the side boundary.

- b) Increased setbacks and garden bed widths to achieve a better landscape interface along the Boys St frontage has not been achieved. The 1m wide garden bed widths provided are insufficient to provide required soil volumes to establish tree planting as proposed in the Landscape concept plan. Trees will need to be planted with a min 1m offset from structures to avoid future conflict, and the current proposal would result in the trees encroaching into the verge as the trees mature.

Trees proposed along Boys St are required to reduce the bulk and scale, provide privacy between public realm and private open space or dwellings. Tree canopies along Boys St indicated on plans appear to measure 3m in diameter, which is smaller than most 'small canopy trees', and smaller than the proposed tree species at maturity. The proposed trees in 1m wide garden beds, placed 500mm from the built form, would need regular pruning to avoid conflict with the built form, resulting in lopsided and unsustainable tree canopies.

The narrow garden beds further do not meet the requirement for better screening of the undercroft.

- i) Amend proposed plans to achieve tree planting in min 2m wide garden beds along the Boys St frontage to allow for the establishment of shade canopy trees to reduce bulk and scale, improve visual amenity and separation from public realm areas, and to comply with AO28.1 of the Multiple dwelling code.
- c) Finished levels (FLs) to deep planting and other landscaped areas have not been provided in the revised Landscape concept plan as advised, and are required to demonstrate that the proposal will achieve viable landscaping outcomes to meet relevant code requirements.

Architectural and Landscape plans and sections/elevations do not clearly indicate whether some landscaping areas are raised (as some appear to be), making the assessment of potential impacts and conflicts inconclusive. Potential conflicts within the overland flow path, and the difference in levels between landscapes and buildings is required to ensure the proposal is safe and effective; also, show how maintenance access to all landscape areas will be achieved.

The Storm Water Consulting Report Figure 2.3 indicates deep planting and site frontage landscaping 'at existing levels', and a raised and solid slab where landscaping is proposed near visitor car parking and bins storage.

It is further noted that the number of steps from Boys St to Unit entries is equal to all units, however, FLs at the verge interface varies considerably between Unit 1 and Unit 7.

- i) Indicate proposed finished levels of all landscaped areas for assessment, including within the verge (ie, back of kerb and at proposed entry gates).
- ii) Check and revise steps at Unit entries where required to meet proposed FLs at entry gates.
- d) Containerised planting details to demonstrate quality outcomes of planting in raised planters has still not been provided as requested.
- i) Provide details of planter depths for proposed containerised planting including internal soil and mulch depths, drainage media, irrigation, and connection to stormwater in accordance with Sections 3, 5 and 6 of the Landscape design planning scheme policy.

- e) Concerns raised and information requested regarding CPTED and landscape maintenance have not been addressed.
- i) Provide details of safe and convenient access for residents and for maintenance purposes to deep planting in common ownership areas between buildings in accordance with PO23 of the Multiple dwelling code and Section 10 of the Landscape design planning scheme policy.
- f) Page 1 of the Storm Water Consulting (SWC) Report states that *undercroft areas would be inaccessible to people as these areas are fenced off and would include deep planting*.

Page 4 of the SWC Report also advises that planting at the Boys St frontage will be at natural ground level, and would therefore not contribute to any blockage of the overland flow path.

It has not been demonstrated that proposed landscaping located within the overland flow path can withstand the expected stormwater impacts.

- i) Provide details of any existing or proposed underground services and retaining walls within deep planting areas to demonstrate compliance with AO29.4.
 - ii) Demonstrate that landscaping (including soil, mulch, and planting) proposed within the overland flow path will not be eroded or otherwise damaged by proposed water velocities and depths.
- g) The proposed Bin collection area on Boys St appears to encroach into the standard footpath alignment, and existing finished levels (FLs) may not be appropriate for bin collection.
- i) As requested above, provide FLs at back of kerb and entry gates to allow assessment of the proposed bin collection area within the streetscape.
 - ii) Demonstrate compliance with relevant sections of Chapter 3.7 of the Infrastructure design planning scheme policy to ensure safe pedestrian movement along the streetscape fronting Boys St, including a 1:50 crossfall across the verge, and indicating adequate clearance between the new 1.2m wide footpath and bin collection area.

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

Yours sincerely



Dominic Hudson
Senior Urban Planner
Planning Services North
Phone: (07) 3178 0229
Email: Dominic.Hudson@brisbane.qld.gov.au
Development Services
Brisbane City Council