



06 July 2026

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

Via Email: DSPlanningSupport@brisbane.qld.gov.au

ATTN: Kellie Hilton

Dear Kellie

RE: **MULTIPLE UNIT DWELLINGS UPON LAND AT 14A COLINA STREET, WYNNUM (SUPER LOT 3 BCC # A006805415)**

We write in relation to the abovementioned development application and Council's Further Advice Correspondence dated 13 May 2026. We respond to the matters raised as follows:

1. Stormwater / Flooding

The trunk drainage is still unresolved and may impact the flood management strategy. This application cannot be approved without an Infrastructure agreement (IA). The developer is to enter into an Infrastructure Agreement to resolve issues associated with trunk and non-trunk drainage through the site, as per the approved reconfiguration application (A006154711), noting the proposed lots have not yet been formed or plan sealed.

In response to this item, we acknowledge that the trunk drainage infrastructure and associated Infrastructure Agreement (IA) remain under assessment by Council. As requested, a formal application for the required Infrastructure Agreement has been lodged and is currently progressing through Council's approval process.

Notwithstanding this, we do not consider the outstanding IA should delay the assessment or determination of the current development application. The Infrastructure Agreement process is separate to the planning assessment and is often subject to extended timeframes beyond the applicant's control.

To ensure Council's interests are appropriately protected, we request that an appropriate sequencing condition be imposed requiring that the approved Reconfiguration of a lot development, including execution of the Infrastructure Agreement and completion of the associated trunk and non-trunk drainage works, be completed prior to the commencement of any building works associated with this Material change of use approval. This approach is consistent with the approved subdivision and ensures that the necessary drainage infrastructure will be delivered before the proposed development can commence, while avoiding unnecessary delays to the determination of the current application.

2. Traffic

The external roadworks associated with the approved reconfiguration application (A006154711) are required to be completed, to provide access to the proposed development.

Noted. As discussed throughout the assessment process, the external roadworks associated with the approved Reconfiguration of a lot application (A006154711) are physically required to provide access to the proposed development. Accordingly, we have no objection to the inclusion of an appropriately worded sequencing condition requiring the completion of the approved external roadworks prior to the commencement of the approved Material change of use development.

3. Architecture

The inclusion of stairs up from Colina Street to gain access to a platform lift (adjacent to Unit 006) does not provide for adequate equitable access. The plans will be required to be amended to demonstrate equitable access from Colina Street to the podium terrace.

- Amend the design of the equitable access from Colina Street.
- Demonstrate that the platform lift will remain operation in the immediate aftermath of a flood event noting that the call buttons for the lift at the street level may be impacted by flooding i.e the call buttons will need to be designed to be waterproof.

A revised set of Architectural Plans has been prepared by *Thinktank Architects* and is provided for Council's consideration. As part of these revisions, the previously proposed platform lift has been removed and replaced with a compliant 1:14 access ramp extending from Colina Street to an internal lift, which provides accessible access to the podium level. This design achieves an accessible, continuous path of travel while simplifying the proposed access arrangements.



Figure 1: Ramped Pathway to lift access to Podium level

4. Fuel burning - Medium impact industry B – or higher

It is noted that the response to the Further advice advises that emergency diesel fire service pump sets are proposed in a duty-standby arrangement, such that only one pump operates at any time. The response specifies a maximum energy output of 75kW per pump and diesel fuel capacity per pump, indicating that more than one pump is installed, notwithstanding that they do not operate simultaneously. Operation is stated to be limited to routine testing and emergency use and is not expected to exceed 100 hours per year.

City Plan 2014 defines Fuel Burning industry use based on installed capacity, rather than simultaneous operation. For example, two pumps installed at 75kW each result in a total installed capacity of 150kW (0.15MW), which exceeds the 0.1MW threshold, even if the pumps do not operate at the same time. Accordingly, further clarification is required, provide further information to address one of the following:

a) Installed capacity $\leq$ 0.1MW

Clarify and confirm that the development will be limited to a total installed fuel-burning capacity of 0.1MW or less (for example, by limiting the development to a single fire pump with a maximum capacity not exceeding 0.1MW), and acknowledge that Council may impose a condition to restrict installed capacity accordingly; or

b) Installed capacity $>$ 0.1MW – Industry use triggered

If the development proposes two or more fire pumps rated at 75kW, or otherwise results in a total installed capacity exceeding 0.1MW, the proposal triggers an Industry (Fuel Burning) and the application will need to be amended accordingly, including submission of updated DA forms supported by an Air Quality Assessment prepared by a suitably qualified person demonstrating compliance with the City Plan 2014 Industry Code.

Note:

City Plan 2014 Schedule 1 – Industry Thresholds defines Fuel Burning (where not a utility installation) as:

- *Medium impact industry – B: Installed capacity $\leq$ 0.1MW (subject to operating hours and fuel type);*
- *High impact industry: Installed capacity $>$ 0.1MW and $<$ 10MW, not involving coal combustion.*

In response to this item, we respectfully submit that the proposed development does not trigger a Fuel Burning Industry use.

The development proposes emergency diesel fire service pump sets with a rated capacity of 75kW (0.075MW) each. While two pumps are provided for each building, they are configured in a duty-standby arrangement, such that only one pump is capable of operating at any one time. Accordingly, the maximum operational fuel-burning capacity at any given time is limited to 75kW (0.075MW), which is below the 0.1MW threshold identified within Schedule 1 of the City Plan 2014.

The provision of two fire pumps is not proposed to increase the operational capacity of the development but is a mandatory redundancy requirement under AS 2419.1:2021, which requires no fewer than two fire hydrant pump sets to ensure continuity of the fire hydrant system. This redundancy ensures that if one pump is offline for maintenance or fails during an emergency event, the second pump remains available to maintain the required level of fire protection. The standby pump is not intended to operate concurrently with the duty pump and is only utilised where the primary pump is unavailable or has failed.

It is further noted that Council has previously approved comparable developments incorporating two diesel fire service pumps in a duty-standby arrangement through the application of appropriately worded conditions limiting their operation. These conditions acknowledge the necessity of providing two installed pumps to satisfy the relevant Australian Standard while ensuring that only one pump operates at any given time. An example of such a condition is reproduced below for Council's convenience:

CONDITION	TIMING
26) Fuel Burning - Fire Booster Pumps, Generators, Flood Pumps Any fuel burning (ie plant/equipment using either Diesel or Gas) for the operational phase, (ie Fire Booster Pumps, Flood Pumps, Power Generators, Car Stackers etc) are to be designed, constructed and operated in accordance with the following: only 2 Diesel Fire Booster Pumps are permanently permitted on site, consisting of 1x Primary Pump and a 1x Secondary Pump, each with a maximum of 0.085MW installed fuel burning capacity, (both pumps are not to be operated or tested/maintained at the same time, with and the Secondary Fire Booster Pump only to be used in the event the Primary Pump fails); (NOTE: It is again reiterated that all the above fuel burning and/or backup plant/equipment is only to be used in the event of an emergency/fire/flood event or loss/disturbance to electricity supply). Timing: Prior to the Commencement of the Use and then to be maintained.	As indicated
26(a) Submit Certification to Development Services Submit Certification to Development Services, by a suitably qualified RPEQ Engineer that demonstrates the fuel burning equipment is in accordance with the above requirements. Timing: Prior to the Commencement of the Use.	As indicated

Accordingly, should Council consider it necessary, we have no objection to the imposition of a similarly worded condition of approval restricting the operation of the emergency diesel fire service pumps to a duty-standby arrangement and prohibiting simultaneous operation. Such a condition would appropriately regulate the operation of the equipment while recognising the redundancy requirements of AS 2419.1:2021 and would avoid the need to unnecessarily amend the application to include a Fuel Burning Industry use.

5. Irrigation and Water Storage Requirements

It is acknowledged that the Further Advice response proposes a 10,000L increase to the onsite stormwater-harvesting capacity for Lot 3 to provide a total 40,000L for this portion of the site. An increase to the water storage capacity for Lot 3 is required to effectively maintain the onsite inground and containerised landscaping in response to requirements of PO12 of the Landscape work code and Landscape design planning scheme policy. Submit additional plans and information to illustrate:

- The proposed irrigation application rates (Litres per m² per week or day) for the onsite landscape areas within the development prepared by a suitably qualified person accredited as a certified irrigation designer by the Irrigation Association of Australia, holding a Diploma of irrigation, or with equivalent experience
- The stormwater harvesting capacity and water tank storage requirements to effectively irrigate the onsite landscape areas which is calculated using the methodology within Sections 6.2/3 – Table 5 of the Landscape design planning scheme policy; and, The proposed size, capacity and location of the water storage devices to effectively service the irrigation requirements of this development.

In response to the above RFI item, a Stormwater Harvesting Strategy Report has been prepared by RP Design and is submitted for Council's consideration. The assessment concludes that, subject to the adoption of the recommended water storage volumes, the proposed development will provide sufficient stormwater harvesting capacity and water storage to effectively service the irrigation demands of the onsite landscaping. Should Council consider it necessary, the recommended storage volumes can be managed through an appropriately worded condition of approval.



We have now responded to the further issues in full. Should you wish to discuss the matter further, please do not hesitate to contact our office on 07 5613 2499.

Yours faithfully
TOWN PLANNING ALLIANCE PTY LTD

A handwritten signature in black ink, reading 'Z Richards', is positioned above the printed name.

Zoe Richards
TOWN PLANNER

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