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

Attention: Dane Hoffman – Assessment Manager

Dear Sir/Madam

Response to Information Request – Development Application for a Development Permit for a Material Change of Use for Medium Impact Industry (storage yard) and Transport Depot at 93 Bukulla Street, Wacol QLD 4076 and described as Lot 13 on SP132727.

BCC Ref: A006934383

We refer to Council's Information Request dated 4 February 2026. On behalf of the applicants, Bukulla Holdings Pty Ltd and Marble Logistics Pty Ltd, please find below responses to each of the Information Request items, which have been reproduced in italics below.

Bicycle Network

- 1) A secondary cycle route is identified within the subject site. The development must not prejudice the future 6.0m wide road reserve along the rear of the site for a future shared bike path. The alignment of the cycle route should be positioned to tie in with the 6.0m wide cycle corridor conditioned under development approval A005856803. Amended plans must ensure that structures and improvements for the proposed development do not conflict with the 6.0m wide no-to-prejudice area. Retaining walls must be outside this area. Drainage pipes crossing this area can be accepted where under existing levels.***

Response:

Council has requested a 6.0m non-prejudicial corridor along the rear boundary of the site for a future shared bike path. It is understood that this corresponds generally to the indicative secondary cycle route shown on the Bicycle Network Overlay map, and provisions in table 4.3.2.A of chapter 4 of the Infrastructure Design Planning Scheme Policy.

Please refer to the attached proposal plans and civil siteworks concept plans, which have been amended to provide a tapered non-prejudicial area which is able to accommodate a future cycle route. This will have a dimension of 6.0m at the eastern boundary of the site and will progressively taper to nil at the truncated corner at the western boundary of the site.

This will integrate with the future bikeway corridor component within Council land, to provide a 6.0m wide overall corridor width along the rear boundary interface. This arrangement will integrate with the comparatively unconstrained corridor on the western side of the site and rear boundary where clearing has historically occurred and a slashed grass corridor is maintained, compared to areas toward the eastern side of the rear boundary. A plan extract is provided in figure 1 below.

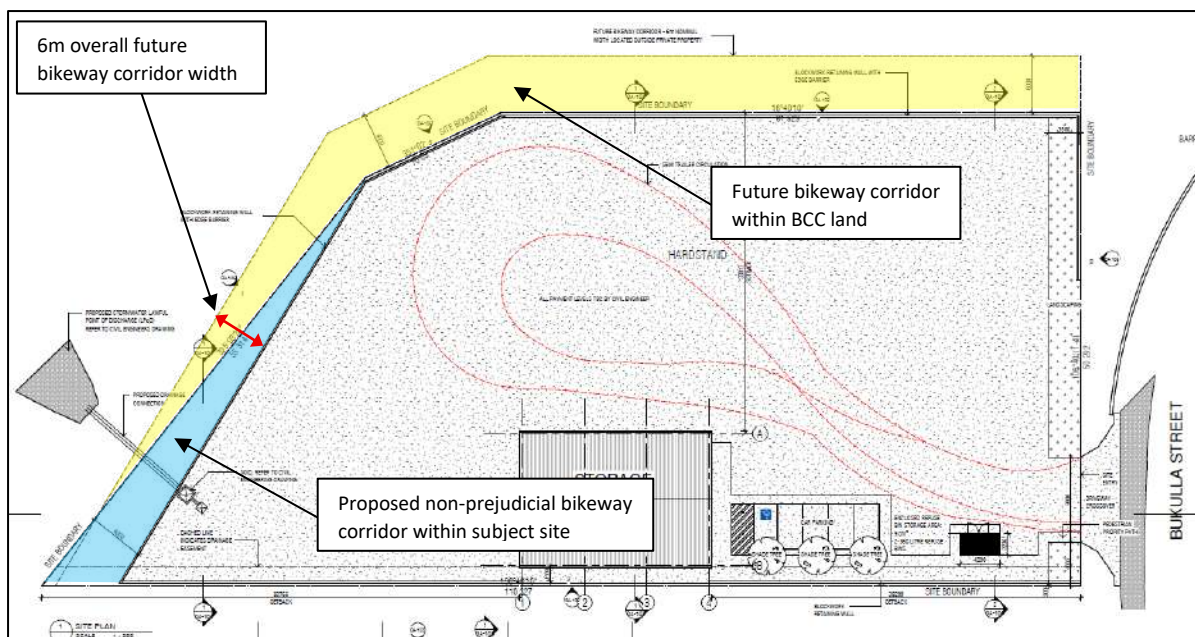


Figure 1: proposed non-prejudicial future bikeway corridor configuration.

This arrangement will lessen the area which is quarantined from productive future land use and will maximise industrial land utility. In this respect, it is considered that amendments to Bicycle Network Overlay mapping between the superseded version 32 and current version 35 suggests Council recognition of a need to balance impacts upon private properties and future industrial capacity versus works that are able to be accommodated in the waterway corridor (see extracts in Figure 2 below). However, the amended overlay mapping does not account for instances where disturbance has already occurred.



Figure 2: Bicycle Network Overlay and secondary cycle route alignment in superseded version 32 (right) and current version 35 (left).

It is noted that the proposed design solution reflects discussions with Council’s assessment manager, who has received positive feedback from internal BCC stakeholders, and it has been advised to the applicant that Council is amenable to the proposed outcome.

Adjoining Vegetation

- 2) *The proposed plans for this development illustrate stormwater and retaining walls/earthworks within the potential Tree Protection Zone (TPZ) of existing Waterway and NALL protected vegetation on 451 Progress Road (Lot 4 on SP299282). These works may impact the long-term health and viability of existing vegetation. Further information is required to understand the impacts to adjoining vegetation, for further consideration by Council officers. Provide an Arboricultural Impact Assessment prepared by a suitably qualified arborist (minimum AQF Level 5) to assess the impact of the proposed works. The report is to identify the following:*
- a) *Botanical species name of trees;*
 - b) *Height, diameter of tree trunk at breast height and crown diameter;*
 - c) *General health assessment and character of trees;*
 - d) *Identification and illustration of Tree Protection Zones (TPZ) and Structural Root Zones (SRZ) of trees in accordance with AS:4970;*
 - e) *Description of the proposed works and construction methodology to be used within TPZ of trees;*
 - f) *Evaluation of the proposed construction methodology and potential impacts on the trees;*
 - g) *Evaluation of any pruning works (including canopy and/or root pruning) which may be required as a result of the proposed works.*

Response:

An arboricultural impact assessment report has been prepared by Arbortrack Australasia Pty Ltd (ref: QN/rpt1/Bukulla/AIA, dated 29/04/26) to address item (2) of the information request and is attached to this response.

The report notes that the proposed development and works necessary to provide flood immunity will result in an environment which is unsuitable for most of the surveyed trees within the site, and adjacent to the site boundaries within 451 Progress Road, to be retained.

However, it is pertinent to note that such impacts will be unavoidable as a consequence of eventual construction by Council of the 6.0m wide cycle corridor identified and addressed in preceding item (1).

Traffic

- 3) *The Civil Siteworks concept plan (sheet 1 of 3) and the Functional Road Layout plan (2534-DES-001 Rev.3) requires minor amendments and further details to demonstrate that site access and associated works will comply with the Infrastructure Design Planning Scheme Policy and Code and Transport, Access, Parking and Servicing (TAPS) Code.*
- a) *An edge line is required at the pavement widening for the crossover to guide westbound traffic past the widening and away from the guard rail.*
 - b) *Demonstrate that the flares of the proposed driveway will have appropriate separation from and not impact on the existing power pole (1.0m minimum separation required).*

Response:

An amended functional road layout plan has been prepared by Brett's Traffic Engineering (ref: 2534-DES-001, revision 4, dated 24/04/26) to address item (3) of the information request and is attached to this response. Additionally, civil siteworks concept plans contained within Appendix C of the civil engineering report prepared by DEQ Consulting Engineers (ref 25.1595 DA REPORT, dated 29/04/26) have been updated for consistency, where relevant.

Earthworks

- 4) *Further details are required to demonstrate earthworks will be generally in accordance with the Filling and Excavation Code and not adversely impact on neighbouring land.*

- a) *Provide concept earthworks plans that clearly demonstrate pad levels, height and arrangement of proposed retaining walls, and cross sections in each axis to show how earthworks will integrate into existing surrounding levels for further Council assessment.*

Response: An earthworks concept plan and sections have been prepared by DEQ Consulting Engineers (ref: 25.1595, drawing SK.05 and SK.06, revision 3, dated 27/04/2026) to address item (4) of the information request and included in Appendix C of the amended civil engineering report which is attached to this response.

Stormwater

- 5) *Submit the MUSIC model file to ensure an assessment of the Stormwater Quality Management Plan as part of the Site Based Stormwater Management Plan (25.1695 SBSMP) prepared by DEQ Consulting Engineers, dated 10/12/2025 can be completed.*

Response: The site-based stormwater management plan (SBSMP) .SQZ MUSIC model digital files to suit option A and option B identified in section 5.7 of the SBSMP are included as part of the response to the information request. The amended site-based stormwater management plan (ref: 25.1595 SBSMP, dated 29/04/26) is also attached to this response.

Landscaping

- 6) *Proposed landscape areas are reduced in width due to retaining walls, particularly along the frontage where the landscaping zone narrows to 2.4m instead of the proposed 2.9m. This reduces the available planting area. This is acceptable, however the development does not achieve the 3% landscape area required by AO13.1 of the Industry Code. There is an opportunity to widen the carpark planting areas in the carpark to meet the requirement. Planting zones intended for shade trees must provide minimum dimensions of 2m x 5m to accommodate healthy root systems and support canopy development. This is required to ensure trees can achieve a minimum 50% shade cover within 5 years, consistent with PO9 of the Landscape Work Code. Provide amended plans which illustrate the following:*
- a) *A minimum 3% of the site allocated to functional landscaping within the carpark;*
 - b) *Generous planting areas (minimum 2m x 5m) capable of supporting trees that will provide meaningful canopy cover.*

Response:

An amended set of proposal plans has been prepared by Studio Arkitecture (ref: 2530, issue A, dated 15/04/26) that addresses item (6) of the information request. Please note that the landscape strip proposed along the front boundary has been increased in width from 2.9m to 3.5m to offset any reduction in width on account of retaining walls. This will result in an increase in total landscaping from 120m² to 144m², which equates to an increase from approximately 2.66% of the site area to approximately 3.19% of the site area.

The complies with AO13.1 of the Industry Code, which requires development to provide landscaping which covers a minimum of 3% of the site area, and includes a landscaped strip along the site frontage with a minimum width of 2.0m.

As the proposed landscape strip along the front boundary exceeds 2.0m and occupies an overall length of 41.292m comprised of one length of 36.627m and one length of 4.665m, it will be capable of accommodating a healthy root system and support for canopy development. This will comply with AO13.2 of the Industry Code.

In respect of PO9 of the Landscape Works Code noted by Council, it is noted that compliance can be readily achieved with the corresponding acceptable outcomes, which are –

AO9.1

Development provides species in a car park that are selected in accordance with the Planting Species Planning Scheme Policy.

AO9.2

Development provides planting areas within car parking areas that are protected by wheel stops or bollards.

Species selection and protection measures will be addressed at the detailed design stage and can reasonably be addressed through conditions of approval. Accordingly, it is not necessary to directly address the provisions of PO9.

Refuse

7) *In accordance with AO16.1, AO16.2 of the Industry Code and AO8.1, AO8.2 of the Infrastructure Design Code provide an amended site plan which addresses the following:*

- a) *Demonstrate the refuse storage area for each tenancy is a minimum size of 23.8m² (10.820m x 2.200m). Note size (dimensions and area) are to be demonstrated on amended plans.*
- b) *Demonstrate the refuse storage area is housed within a building or wholly roofed and screened enclosure. Where screening is utilised to form part or all of a refuse storage area, the screening is to have a maximum of 25% openings, with a maximum opening dimension of 50mm, and are to be permanently fixed, durable and maintainable.*

Response:

Please refer to drawing DA-102 of the amended proposal plan set, which provides additional detailing in regard to proposed refuse storage arrangements. The proposed refuse bin storage area will exhibit a width of 4.2m and depth of 2.236m, will occupy an area of approximately 9m², and will accommodate 2 x 360 litre mobile refuse bins.

In regard to sub-item (a), it should be clarified for Council that the proposed development is intended to be occupied by a single tenant. It is considered that the minimum area and minimum dimensions identified by Council will far exceed functional requirements for the proposed development, which is for an integrated medium impact industry (storage yard) and transport depot. Additionally, the methodology or inputs used to inform Council's calculations is not known.

The Refuse Planning Scheme Policy provides further guidance in respect of refuse matters:

- For industry uses, table 4 (non-residential refuse generation rates) specifies a refuse generation rate of 50 litres / 100m² / day each for general refuse and recyclable waste.
 - No specific waste generation rate is identified for a transport depot.
 - Section 5.2 notes that where refuse generation rates are not defined in table 4, the applicant is to provide evidence to support of the refuse generation proposed.
 - As the proposed development is for an integrated medium impact industry (storage yard) and transport depot for the storage and maintenance of heavy vehicles and equipment, it is appropriate to adopt the industry refuse generation rate for the combined uses.
 - Administrative functions will be ancillary and to will only occupy minimal building space. Accordingly, it is reasonable that refuse generation will be based upon the primary land uses and the additional refuse generation rates attributable to a standalone office development are not relevant.
- Table 2 (non-residential service frequency requirement) specifies a maximum service frequency of 3 times per week for the Industry Investigation Zone.

Adopting the above rates, the proposed integrated development comprising a gross floor area (GFA) of 301m² will generate –

- General waste:
 - 150.5 litres per day
 - 903 litres per week (based upon a 6 day working week)
- Recyclable waste:
 - 150.5 litres per day
 - 903 litres per week (based upon a 6 day working week)
- Total waste generation:
 - 301 litres per day
 - 1,806 litres per week

Assuming that refuse collection occurs 3 times per week (as per table 2), this would equate to 301 litres of general waste and 301 litres of recyclable waste per collection. Based on this requirement, the provision of 2 x 360 litre refuse bins will be adequate and will also provide overflow contingency for any unforeseen and infrequent occasion where waste generation may be temporarily elevated.

Table 1 identifies refuse bin types and dimensions. For a 360 litre bin, the largest stated dimensions are 680mm width X 1,100mm height X 848mm depth. The proposed enclosed bin store will have a width of 4,200mm and depth of 2,236mm, which can comfortably accommodate 2 x 360 litre refuse bins in a side-by-side arrangement. Whilst it is not proposed, it is noted that if collection frequency were to be reduced by the future site operator, there is adequate storage space to accommodate additional 360 litre bins, while if larger refuse bins were provided, the bin store could accommodate 2 x 660 litre or 2 x 1,100 litre bulk bins.

In regard to sub-item (b), additional detailing has been added to the proposal plans to indicate that the refuse bin storage area will be enclosed. Requirements for enclosure, roofing and screening can be addressed through conditions of approval which require bin storage to be provided in accordance with the Refuse Planning Scheme Policy.

Further Advice

- 8) To assist in the calculation of infrastructure charges, provide a plan illustrating existing and proposed impervious areas for the development.**

Response:

Please refer to drawing DA-100 of the amended proposal plan set, which identifies an 'existing' impervious area of 275m² which reflects the footprint of the dwelling house, ancillary buildings and driveway areas of the previous residential land use.

As the site survey was undertaken after removal of all building structures, the 'existing' impervious area has been estimated from aerial images.

Drawing DA-101 identifies that the proposed impervious area is 4,144m², which excludes proposed landscaping areas and the non-prejudicial bikeway corridor at the rear of the site.

The following documents are attached and form part of this response to Council's Request for Information:

- Amended proposal plan set prepared by Studio Arkitecture
- Amended civil engineering report and site-based stormwater management plan prepared by DEQ Consulting Engineers
- MUSIC model files prepared by DEQ Consulting Engineers
- Arboricultural impact assessment report prepared by Arbortrack Australasia Pty Ltd
- Amended traffic engineering functional layout prepared by Bretts Traffic Engineering

In accordance with Part 3, section 13.2(a) of the *Development Assessment Rules* under the *Planning Act 2016* section 68(1), this letter and attachments constitute the applicant's response to Council's Information Request Letter.

Public notification will now be initiated within statutory timeframes.

Should you have any further queries in this regard, please contact Adrian Cedro from our office on (07) 3876 0533.

Thank you very much for your assistance with this application.

Yours faithfully,

Ken Ryan and Associates Pty Ltd