



# ALTITUDE

TOWN PLANNING

1 September 2026

Chief Executive Officer  
Brisbane City Council  
GPO Box 1434  
BRISBANE QLD 4001  
Via email: [Dominic.Hudson@brisbane.qld.gov.au](mailto:Dominic.Hudson@brisbane.qld.gov.au)

Attention: Dominic Hudson

Dear Dominic,

**Re: A006915121 Further Issues Letter Response**  
**Development Permit for Reconfiguration of a Lot (2 into 22 lots plus new road and drainage reserve and balance lot)**  
**383-393 Hawkesbury Road, Anstead QLD 4070**

We refer to Council's further issues letter dated 31 July 2026 in relation to the above-mentioned application. A full response has been prepared and is detailed as part of this correspondence and we are confident that this revised design and amended information will enable Council to complete their assessment and provide a favourable determination.

This response is supported by the following information:

Attachment 1 – Amended Civil Engineering Drawings  
Attachment 2 – Amended Subdivision Plan  
Attachment 3 – Ecological Matters Response  
Attachment 4 - Amended Bushfire Management Plan

A specific response to each of the items raised by Council is as follows:

***Stormwater drainage design***

***1) The following must be provided to demonstrate compliance with PO1 of the Stormwater code:***

- a) All lots draining to the overland flowpath must be provided with a roofwater pit and headwall with a stabilized outlet design discharging the existing low-point.***
- b) The swale at the rear of Lots 13 to 21 may be reduced to 1.5m wide, subject to the RPEQ showing there is capacity for a swale in that width to manage major flows.***

**Applicant Response**

In accordance with this request from Council, the following amendments have been made in relation to the proposed subdivision design and related technical engineering reporting:

- Roof water pits and head walls have been added to Lots 1 – 6 which drain to the overland flow path. The headwall arrangements also include grouted rock pitching for scour protection.
- The swale at the rear of Lots 13-21 has been reduced to 1.5m, with this arrangement also supported by a RPEQ Level 3 pipe/sizing capacity assessment.



For further information in relation to this aspect, please refer to **Attachment 1** – Amended Civil Engineering Drawings and specifically Drawing No. SHT-200 REV H

***Overland flow path and flood immunity for proposed lots***

**2)** In accordance with PO5 and PO7 of the Flood overlay code, provide minimum lot levels for lots 1 to 4 based on achieving the minimum flood planning level as noted below:

a) Lot 1 should be at least 150mm higher than the adjacent basin embankment level, requiring 26.15m AHD.

b) Lot 2 should be 26.3m AHD based on the flood modelling

c) Lot 3 should be 26.7m AHD based on the flood modelling

d) Lot 4 should be 27.0m AHD based on the flood modelling

**3)** The acceptable outcome of the Flood overlay code requires all lots to be completely flood immune to the relevant flood planning level where creating 6 or more lots. As the performance outcome seek to ensure the safety and suitability of land for all flood events, safety must be demonstrated for all flood events, including extreme events such as the 1 in 2000 AEP flood. Given that the 0.5% AEP flood shows there are areas of unsafe hazard, it would not be possible to meet the performance outcome in larger flood events. Accordingly, the flood-affected portions of Lots 1 to 4 should be dedicated to Council and incorporated into the basin lot.

**4)** The 300sqm flood free building platform is only a requirement for where <6 lots are proposed. Furthermore, the proposal only provides for a 248sqm Building Location Envelope (BLE) when considering building setbacks. For a reconfiguration of this scale, a performance outcome would reasonably require a flood-free area more consistent with the dimensions of a standard 450m<sup>2</sup> residential lot. This would necessitate a flood-free building platform of at least 450m<sup>2</sup>, ensuring future development can occur without reliance on flood-affected land and removing the need to include inundated areas within the proposed residential lots.

**5)** The hazard maps provided clearly show that the low-point and highest hazard of the mapped overland flowpath completely enters Lots 1 and 2. Additionally, parts of these lots are impacted by H3 hazard in the 200Y ARI event (0.5% AEP), which will become worse again in larger floods. Therefore, the rear of these lots cannot be retained as freehold land with easement and must be part of the land dedication to Council (eg part of basin lot).

**6)** Flood hazard as defined by City Plan (refer Flood PSP) limits depth to 500mm, which is also a consideration.

Applicant Response

In accordance with these matters from Council, a number of design revisions and technical drawing changes have been prepared and accompany this information request response.

Specifically, we note that:

- Lots 1 to 4 have been regraded to now be provided with the minimum lot levels. These relevant levels are shown on Drawing ST-100 REV F.
- The relevant 'flood affected/overland flow path' portions of Lots 1 to 3 have been proposed to be dedicated to Council.

For further information in relation to this aspect, please refer to **Attachment 1** – Amended Civil Engineering Drawings and **Attachment 2** – Amended Subdivision Plan.

***Flood impacts***

**7)** The overland flowpath within Lots 1, 2 and 3 must be land dedicated to Council. Amend the proposal lot layout to incorporate the overland flow path within the land dedication area and increase the flood immune portion of each affected lot to a minimum 450sqm (or greater, where supported by flood modelling) as required under the Flood overlay code, as:



- a) Lots 1, 2 and 3 are clearly shown within the main floodway of the overland flow path based on the flood study hazard maps. This flowpath cannot be bisected by multiple freehold lots as the fencing will obstruct flows. The flood study has not modelled these fences as obstructions, and it would create additional flood impacts.*
- b) The statement regarding rural fencing is not considered a relevant and reasonable condition, not a suitable expectation by owners for residential lot and cannot be regulated by City Plan. While it would be expected that the fencing in that area would be required to be permeable pool fencing to convey stormwater flows, this fencing is still susceptible to blockages by debris and would need to be allowed for in the flood modelling.*

#### Applicant Response

In accordance with this request from Council, the following amendments have been made to the ROL plan and associated technical preliminary civil engineering drawings:

- The relevant 'flood affected/overland flow path' portions of Lots 1 to 3 have been proposed to be dedicated to Council.
- The flood immune portion of each of these affected Lots 1 to 3 has been increased to a minimum 450m<sup>2</sup>.

For further information in relation to this aspect, please refer to **Attachment 1** – Amended Civil Engineering Drawings and **Attachment 2** – Amended Subdivision Plan.

#### ***Biodiversity areas***

*8) The revised plans submitted in response to the information request do not demonstrate that the proposed development has been designed to protect and enhance koala habitat. Specifically, the plans do not demonstrate the retention of the maximum number of non-juvenile koala habitat trees, nor do they adequately consolidate and maximise the size of on-site conservation areas, including their integration with adjoining sites. As such, compliance with PO4, PO7, and PO8 of the Biodiversity areas overlay code has not been satisfactorily demonstrated.*

*Additionally, the proposed development now includes Lot 23 as part of the subdivision. Given this change, amendments to the submitted Tree Retention Plan and Concept Rehabilitation Plan are required. Significant residual impacts to areas of MLES must also be considered as part of the development proposal in accordance with PO9.*

- a) Provide revised plans (e.g. subdivision, engineering, tree retention & rehabilitation) identifying a minimum 15m east-west ecological corridor along the southern boundary unless detailed justification provided demonstrating compliance with the performance outcomes sought;*
- b) Provide an updated Tree Retention Plan that includes the following:*
- I. Identification of the 10m wide north-south ecological corridor;*
  - II. Identify Tree 369 (Angophora leiocarpa) for retention. Earthworks are to be excluded from the Notional Root Zone (NRZ);*
  - III. Update the tree retention/removal status of trees reflecting design changes to accommodate the 15m wide east-west ecological corridor;*
  - IV. Identification of unsurveyed trees to the east of the BLE for proposed lot 23.*
  - V. The proposed development plan (as an overlay) including all services/infrastructure (stormwater/sewer) on site and external to the site, which clearly shows the full extent of all earthworks (cut/fill) required during construction of the development; and*
  - VI. Where works encroach into the NRZs of any trees identified to be retained, an updated report from a qualified arborist (minimum AQF level 5 Arboriculture) is required to demonstrate no negative impacts on the long-term health of the trees.*
- c) Provide an Environmental Offset impact calculation that accurately identifies all impacts to MLES in accordance with PO9 of the Biodiversity areas overlay code.*



d) Provide an updated Concept Rehabilitation Plan that identifies the EPZ area to the east of Lot 23 as an area to be rehabilitated.

#### Applicant Response

In accordance with this request from Council, a number of design changes have been undertaken as well as technical responses provided for each of the matters raised by Council.

Specifically we will note that:

- In conjunction with the amended civil earthworks design ecological guidance and specialist arborist direction, the proposed development has been amended to enable the retention of Tree 369.
- Whilst the east-west ecological buffer width has not been increased, a detailed and technical assessment against PO4, PO7 & PO8 of the Biodiversity areas overlay code has been undertaken and accompanies this further information response to demonstrate the suitability of the current 10m width proposed (namely when viewed in the context of the adjoining 15m buffer so that a total width of 25m is able to be provided).
- An updated Tree Retention Plan (TRP); Tree Schedule; MLES impact plan; Environmental Offset Calculator & Concept Rehabilitation Management Plan (CRMP) have all been prepared and provided which reflect the revised design and additional tree retention now proposed.

We are confident that the measures that have been undertaken to incorporate the retention of Tree 369 will enable Council to more favourably consider this application in relation to the outstanding ecological/biodiversity matters.

For further information in relation to this aspect, please refer to **Attachment 1** – Amended Civil Engineering Drawings and **Attachment 3** – Ecological Matters Response.

#### ***Bushfire***

*9) The proposed development intends to proceed with including Lot 23 as part of the proposed subdivision given that the subdivision plan has been updated to identify Lot 23 and its BLE. However, the method 2 assessment provided in the Bushfire Management Plan (BMP) uses incorrect inputs for vegetation classification, fuel load, effective slope and site slope which has resulted in incorrect radiant heat exposure calculations for the development.*

##### Vegetation Classification

*Based on the regional ecosystems that occur on the development site, the corresponding cover associated with these communities (i.e. BioCondition benchmarks) and the required rehabilitation of the eastern portion of the site which would be a condition of approval – a classification of forest would be more appropriate. Revised calculations are required that utilise a forest classification in accordance with AS3959-2018.*

##### Fuel Load

*The understorey fuel load and total fuel load used in the method 2 assessment to calculate radiant heat exposure for the proposed development appears to have used fuel loads that correspond with VHC13.2. However, the preclear regional ecosystem (RE) mapped over the eastern portion of the development site is identified as RE 12.9-10.17b. Rehabilitation of the eastern portion of the site will be a condition of approval therefore this vegetation will ultimately be restored to this RE. The VHC corresponding to RE 12.9-10.17b is VHC10.1. A revised BMP is required that calculates bushfire setbacks to areas subject to rehabilitation based on the preclear RE, treating these areas as if they have reached their mature state with respect to fuel loads.*

##### Slope

*The effective slope and site slope for classified vegetation has been determined to be 5 degrees. Contour mapping for the site appears to show that the classified vegetation is upslope.*



*Therefore, in accordance with AS3959-2018 all classified vegetation that is upslope should assume a value of 0 degrees.*

*a) Provide a revised Bushfire Management Plan that addresses the above matters in relation to the method 2 assessment undertaken to determine radiant heat exposure setback requirements for the proposed development.*

Applicant Response

In accordance with this request from Council, an amended Bushfire Management Plan to answer all the matters raised by Council has been prepared and accompanies this information request response.

For further information in relation to this aspect, please refer to **Attachment 4** – Amended Bushfire Management Plan.

We are confident that this further information request response adequately addresses all the matters raised by Council. In this regard, we look forward to Council's timely and favourable determination of this application once they complete their assessment of this detailed response to further issues.

If you require any further information or discussion in relation to the matters raised above, please do not hesitate to contact the undersigned on 0433 737 117.

Yours sincerely,



Gary Savins  
Director  
**Altitude Town Planning**

