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TOWN PLANNING CONSULTANTS

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APPLICATION REF
A007002254

Phone: (07) 3180 4702
Email: brisbane@doyenplanning.com.au
Web: www.doyenplanning.com.au
ABN: 84 684 735 733

21 October 2026

Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

Attention: Dominic Hudson, Senior Urban Planner

Dear Dominic,

RE: Response to public submissions - Development application A007002254 - Material Change of Use for a Childcare Centre at 97 Denham Street, Bracken Ridge

Doyen Planning acts on behalf of the Applicant in relation to development application A007002254, seeking a Development Permit for a Material Change of Use for a Childcare Centre at 97 Denham Street, Bracken Ridge, described as Lot 115 on S2717.

Public notification was undertaken from 21 September to 13 October 2026. Our review of Council's online register on 21 October 2026 identified six published submission documents opposing the application or seeking protective conditions.

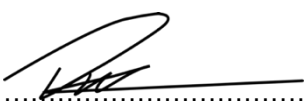
Please find enclosed the Applicant's consolidated response to the matters raised. Overlapping concerns are grouped into key issues and addressed by reference to the amended architectural plans and specialist documentation lodged with the response to Council's Information Request.

The Information Request process resulted in revised landscaping, parking and servicing arrangements, additional acoustic treatment and revised stormwater infrastructure. The enclosed response explains the assessment relied upon, clarifies the intended parking provision and identifies the specialist acoustic requirements to be implemented through detailed design.

The Applicant maintains that the amended 147-place centre, operating from 6.00am to 7.00pm with the documented mitigation and operational requirements, is an appropriate use of the site. No further layout changes are proposed through this response. We request that Council consider the following responses and continue its assessment towards approval.

Should you have any questions in relation to the proposal, please contact our office on (07) 3180 4702.

Yours sincerely,



Rhys Trombetta

Director
Doyen Town Planning

Submission Issues and Applicant Response

97 Denham Street Bracken Ridge

The following table responds to the six submission documents published on Council's register as at 21 October 2026. It consolidates overlapping concerns and should be read with the amended application and the documentation lodged in response to Council's Information Request.

The Applicant relies on the planning and specialist assessments identified below. Where an acceptable outcome is not adopted, the response explains the performance-based position advanced. Detailed construction requirements are distinguished from the design and mitigation measures relied upon for assessment.

Key issue raised by submitters	Applicant response
Scale and suitability of the use Submitters consider that a 147-place childcare centre is excessive for the site and incompatible with nearby homes.	The proposal accommodates 147 children on a 4,082m² site in the Emerging community zone, opposite Bracken Ridge State School and adjoining the Anglican Church of the Holy Spirit. The proximity to these community uses supports the accessibility and co-location considerations in PO1 of the Childcare centre code. The building is predominantly single storey. The first floor contains staff and ancillary facilities, with approximately 130m² of gross floor area compared with approximately 1,100m² at ground level. Children's activity rooms and outdoor play areas are at ground level. The development is therefore not a two-storey childcare activity building extending across the site. The submitted assessments consider the proposed 147-place capacity. The building arrangement, planting, on-site circulation and acoustic treatment respond to the residential interfaces. The Applicant considers these site-specific outcomes, together with the supporting needs assessment, provide grounds to retain the proposed capacity rather than reduce it solely by reference to the number of places.
Need for additional childcare places Submitters question whether another centre is needed given existing services and Council's earlier requests for further information.	Business Geographics' Childcare Needs Assessment dated August 2026 addresses existing supply, forecast demand and the matters raised by Council. It accounts for existing services and the approved 125-place centre at 173 Norris Road, and explains the distinction between total licensed places and long day care places at Little Locals. The assessment identifies availability constraints across particular days and age groups. Its forecast scenarios identify potential additional market need of approximately 220-280 places by 2031. These are the specialist's demand estimates, rather than an assumption that the presence of existing centres demonstrates either adequate supply or a lack of need. The Applicant relies on the updated assessment as support for the proposed provision. Council's earlier request for clarification has been

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Key issue raised by submitters	Applicant response
	answered through that material and should not be treated as a finding that the amended proposal lacks demonstrated need.
Traffic and pedestrian safety Concerns include school-period congestion, additional turning movements, queues, pedestrian conflicts and obstruction of neighbouring driveways.	Rytenskild's Transport Impact Assessment dated 7 September 2026 estimates 97 vehicle movements in the morning peak hour and 71 in the afternoon peak hour for the 147-place centre. These figures include entering and exiting movements. The report assesses the interim access as the fourth leg of the Denham Street and Binburra Street intersection under projected 2027 conditions. Table 5.2 reports whole-of-intersection average delays of 2.6 seconds in the morning peak and 2.0 seconds in the afternoon peak with the development, compared with 1.6 and 1.3 seconds respectively without it. Rytenskild concludes that the assessed intersection would continue to operate within capacity. The crossover incorporates a pedestrian sight splay, and a separate pedestrian entry is provided. The proposal does not rely on neighbouring driveways or the church car park for access or parking. The amended frontage and access design should be considered alongside the capacity assessment when assessing pedestrian safety. The existing school environment and residents' observations remain relevant context. The Applicant relies on the consultant's assessment of the proposed additional traffic; the intersection averages are not presented as a prediction of every driveway delay or internal parking queue. Broader requests for school-zone parking restrictions or crossing treatments can be considered by Council's traffic officers in conjunction with the proposed frontage works.
Parking supply and allocation Submitters question parent parking, staff allocation and conflicting numerical descriptions of the ultimate parking arrangement.	For clarity, the parking arrangements proposed for approval are those illustrated in Figures 4.1 and 4.2 of the Transport Impact Assessment. These provide 31 spaces, including 17 designated staff spaces, under the interim arrangement and 29 spaces, including 16 designated staff spaces, under the ultimate arrangement. Where numerical references in the accompanying narrative differ, the illustrated layouts represent the proposal relied upon for assessment. Section 4.1 identifies an overall acceptable-outcome provision of 30 spaces, including 18 staff spaces. The interim layout exceeds that overall provision by one space. The ultimate layout is one space below the overall provision, while both arrangements vary the nominated staff allocation. The Applicant seeks acceptance of those variations on a performance basis rather than relying on a claim of full numerical acceptable-outcome compliance. The ultimate layout retains on-site staff and visitor parking, including an accessible space, together with the circulation and manoeuvring arrangements illustrated in the transport assessment. It provides

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Key issue raised by submitters	Applicant response
	replacement parking as part of the reconfiguration associated with the future access; it does not simply remove all parking affected by that access. The Applicant considers that the limited overall numerical departure should be assessed in the context of the retained parking facility, its designated allocation and the documented vehicle manoeuvring. A departure from the parking rate does not, by itself, establish that a reduction in centre capacity is necessary. The drawn layouts and their actual allocations are the basis on which Council is requested to assess this matter.
Future access through Childs Street Submitters question the future eastern connection, introduction of traffic to Childs Street and amenity effects of the southern access corridor.	The proposal provides an interim access from Denham Street while preserving the southern corridor for the ultimate eastern connection. Initial operation does not depend on that future connection being constructed. The transport report separately illustrates ultimate on-site circulation, parking and private refuse-vehicle manoeuvring. The southern route has not been omitted from the vehicle-noise model. Plate 7 of NMS's report dated 4 September 2026 shows the moving-line vehicle source extending along that corridor, and section 4.3.1 adopts 97 movements in the assessed peak hour. Appendix D.5 states that NMS is not aware of a conflict between its recommended fencing and easement access. The transport report's SIDRA assessment concerns the interim Denham Street intersection; it is not a separate model of the wider Childs Street network. The Applicant relies on the future corridor as part of the coordinated access arrangement for the Emerging community area, rather than suggesting that the interim intersection results quantify every effect of the future connection. The ultimate connection must be implemented consistently with the adjoining road infrastructure, on-site parking and servicing arrangements and required amenity protection. The Applicant considers that the provision for that future stage does not negate the assessed functionality of the interim arrangement.
Operational noise and updated assessment Concerns include children's play, vehicle noise, indoor noise breakout and calculations based on earlier report inputs.	The assessment relied upon is NMS's Noise Impact Assessment Report dated 4 September 2026, including its detailed response to Council in Appendix D. It supersedes the November 2025 assessment. The current assessment uses 147 children and 97 peak-hour vehicle movements. Appendix D.1 confirms separate scenarios with all 147 children engaged in simultaneous active outdoor play and simultaneous active indoor play, without reducing numbers for quiet or passive activity. The higher traffic input is already incorporated, so an additional adjustment from 61 to 97 movements should not be applied again to the current results. At 8 Childs Street, receiver R4, Table 14 forecasts cumulative levels of 43dB(A) during the day, 40dB(A) during the evening and 34dB(A) during

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Key issue raised by submitters	Applicant response
	the night assessment period, against adopted criteria of 45, 43 and 37dB(A). NMS reports compliance at all seven assessed receivers with the recommended treatment and operating assumptions. Appendix D.2 addresses southern-facade breakout. It explains that the corridor separates the playrooms from that facade, except for Room 9, which has no south-facing windows. NMS considers brief transmission through the corridor during entry and exit negligible in the relevant noise descriptor. The Applicant relies on this updated specialist assessment rather than the superseded inputs cited in parts of the submissions.
Operating hours and acoustic assumptions Submitters question the 6.00am opening time, representative receivers, background criteria, activity durations and the margins between predicted noise and criteria.	The proposed operating hours remain 6.00am to 7.00pm. NMS assesses the early opening period within the night-time acoustic period and recommends no outdoor play before 7.00am. Rubbish collection is also excluded before 7.00am. These restrictions distinguish early arrivals and indoor activity from outdoor play and servicing. NMS measured ambient conditions at two locations and selected receiver criteria by reference to the acoustic environments represented. Receiver locations and heights are described in Table 1 and Appendix D.4. For receiver R5 at 81 Denham Street, Table 9 predicts a car-door event of 57dB(A) against the adopted 60dB(A) criterion. The Applicant relies on NMS's professional selection of criteria and reported results. The submission's alternative receiver or background-noise approach does not itself establish an exceedance. The general discussion of model accuracy in Appendix B likewise does not constitute a finding that the reported predictions fail the criteria. The Applicant relies on NMS's full-capacity active-play assessment, specified mitigation and reported compliance findings. Any clarification Council considers necessary concerning a particular receiver, criterion or activity duration can be directed to that specific assumption. The proposal should be assessed with its documented treatment and operational restrictions, rather than as an unmitigated use.
Acoustic fencing and drawing coordination Submitters question barrier height and extent, gaps, future access conflicts and differences between drawings. Some request a uniform additional fence or landscape buffer.	The acoustic barrier requirements relied upon by the Applicant are those specified in NMS's Noise Impact Assessment Report dated 4 September 2026. That report establishes the required barrier extent, height, continuity and acoustic performance and is nominated for approval as the governing document for acoustic treatment. The revised architectural site and ground-floor plans identify the extended southern acoustic fence as F4, a 2m high lapped and capped timber acoustic fence. NMS specifies continuous, gap-free barriers with a minimum surface mass of 12.5kg/m². The effective height relative to the relevant ground and activity levels must be maintained when coordinating fences with retaining walls.

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Key issue raised by submitters	Applicant response
	The architectural and landscape drawings establish the development layout and landscape treatment at development application stage. Their fencing annotations are not intended to reduce or replace NMS's requirements. Detailed design and construction documentation will coordinate those requirements with the architectural, landscape and civil works, including the future access interface. The Applicant requests that any approval expressly require implementation of NMS's recommended acoustic treatment, with those requirements prevailing over inconsistent general fencing annotations. The no-barrier results are comparative calculations and do not represent the proposal advanced. The Applicant relies on the modelled treatment rather than an assertion that an untreated development would comply.
Plant and waste servicing Concerns include mechanical plant, refuse vehicles, reversing alarms, servicing hours and lighting associated with vehicle activity.	The transport assessment provides swept paths for interim and ultimate refuse servicing. The assessed vehicles manoeuvre within the site and depart in forward gear; internal reversing is included. The architectural plans provide an enlarged, roofed and screened bin enclosure for the interim arrangement. NMS assesses rubbish collection at the northern bin-store location and excludes collection before 7.00am. The ultimate traffic layout relocates the servicing position to the former Denham Street crossover area. Its swept-path assessment establishes manoeuvring feasibility, rather than a separate acoustic assessment of collection and reversing alarms at that position. The ultimate servicing arrangement must retain the residential amenity protection required for the development. External mechanical plant is to be selected, installed and, where necessary, screened to meet NMS's nominated 37dB(A) limit at neighbouring residential premises. NMS considers this achievable through appropriate selection and siting. Final equipment specifications can be resolved through detailed design while retaining that performance requirement. Fencing provides physical screening along the vehicle interfaces. External lighting should be selected and directed to avoid unreasonable spill onto adjoining homes. The Applicant does not seek unrestricted servicing or lighting arrangements inconsistent with the assessed residential setting.
Landscaping and deep planting Submitters consider that planting is insufficient and that replacement planting will not compensate for mature canopy removal.	The layout was amended during the Information Request process to enlarge the dedicated frontage deep-planting area. AGLA's Landscape Concept Plans dated 11 August 2026 identify approximately 24.3m², with dimensions of approximately 5.5m by 4.5m, beside the arrival and parking area. The lodged response identifies this as natural-ground planting, open to the sky and separate from the children's outdoor play spaces. The nominated canopy species include Cupaniopsis anacardioides and Tristaniopsis laurina, with scheduled mature heights of approximately 15m

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	and 10m respectively. Their location enables canopy to shade and soften the parking and arrival environment. AGLA also provides columnar, screen and lower planting elsewhere on the site. The performance response to PO4 and PO5 of the Childcare centre code is set out in the lodged Information Request response. It relies on a usable planting area, suitable canopy species and a frontage location where their landscape and amenity contribution is directly experienced. It does not depend on treating the whole future access corridor as permanent deep planting or representing all acceptable-outcome dimensions and stock requirements as met. The Applicant considers that these measures provide an appropriate site-specific response to the relevant outcomes, having regard to the building, outdoor play, circulation, drainage and future infrastructure requirements. Existing vegetation retention and removal are addressed by S5, while AGLA's plans establish the proposed planting.
Vegetation removal and fauna Concerns include mature tree removal, habitat loss and displacement of possums and other fauna.	S5's Preliminary Ecological Assessment dated 26 August 2026 and Vegetation Retention Plan and Management Schedule dated 20 August 2026 assess existing vegetation and identify proposed retention and removal, including relevant adjoining trees. Illustrative vegetation on the architectural drawings does not replace that documentation. S5 identifies modified, non-remnant vegetation and concludes that the development is viable on ecological grounds. Its assessment recognises habitat for common native fauna within the site's urban context. The Applicant relies on that assessment rather than suggesting that vegetation removal has no ecological effect. The applicable clearing approvals identified by S5 remain necessary. Appropriate pre-clearing checks and lawful fauna-handling procedures can protect animals during the works. The ecological assessment and proposed landscape treatment provide the basis for considering the redevelopment; sightings of common native fauna do not, by themselves, establish that the proposed use is unsuitable.
Retained trees and adjoining property The owner of 26 Childs Street seeks protection of mature trees, roots, fencing and retaining structures during boundary works.	S5 identifies retained trees and tree protection zones, subject to the qualifications in its schedule, including the inspection requirement for Tree 6. Those requirements form the basis for existing vegetation retention associated with the development. The adjoining-owner consents included with S5's assessment relate to specified removals at 103 Denham Street and 8 Childs Street. The proposal does not rely on those consents as authority to undertake unrelated works on 26 Childs Street. Accurate boundary set-out and appropriate footing, excavation and service methodologies are required when detailing works near retained vegetation

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Key issue raised by submitters	Applicant response
	and adjoining structures. Protection measures should respond to the actual tree protection zones and construction activities. The Applicant does not seek authority through this application to enter neighbouring land or undertake works outside the relevant permissions.
Privacy from the upper level The owner of 79 Denham Street raises potential overlooking from the staff balcony and drying court towards private areas at 79 and 81 Denham Street.	The first-floor accommodation comprises staff and ancillary facilities, not children's activity rooms or elevated outdoor play space. Its limited extent and function are relevant to the nature and intensity of the interface. The elevations on drawing DA-09.01 expressly nominate timber-look screening to both the staff balcony and the drying court. These treatments are already part of the design relied upon to manage overlooking; the proposal should not be assessed as an entirely unscreened upper-level terrace. Detailed screen design should retain the intended privacy function and address direct views towards adjoining private spaces. The Applicant considers the limited upper-level use and nominated screening provide an appropriate design response without removing the first-floor accommodation or reducing centre capacity.
Stormwater and major flows Submitters question southern-boundary runoff, combined downstream flows, extreme storms, blockage and climate allowances, and compatibility with future drainage at 16 Childs Street.	HCE's Stormwater Management Plan dated 27 August 2026 and Engineering Information Request Response dated 28 August 2026 establish the revised drainage strategy. The 200m³ detention system has a modelled 10% AEP outflow of 66L/s, below Council's nominated 90L/s limit. Table 10 also reports a 1% AEP tank outflow of 85L/s. The revised material therefore includes a 1% AEP check of detention performance. Those results relate to the tank. The strategy separately accommodates external runoff and an upstream connection bypassing detention, following Council's requirement that upstream flows not be detained in the site's storage. The tank results are not presented as a combined downstream hydraulic-grade or blocked-system calculation. For major flows, HCE distinguishes the car park catchment, which can discharge towards Denham Street, from the lower southern area. HCE explains that redirecting all southern major flows to Denham Street would require substantial filling and retaining. Its alternative maintains the existing southern drainage regime, and HCE expressly advises that neighbouring impacts will not increase. The Applicant relies on that engineering advice. The present strategy uses the existing inter-allotment drainage connection and does not depend on unbuilt infrastructure at 16 Childs Street to commence operation. Any subsequent connection or reconfiguration associated with adjoining development must be coordinated with that infrastructure and preserve the required drainage performance. The Applicant maintains the submitted drainage strategy. The additional downstream-capacity, blockage and climate scenarios requested by

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Key issue raised by submitters	Applicant response
	submitters should be considered against the scope of that strategy and HCE's advice; they are not answered merely by quoting the detention outflow. If Council considers a specific further check necessary, its scope can be identified without assuming that relocation of the tank or wholesale redesign is required.
Detention tank location and maintenance The owner of 8 Childs Street raises concerns about boundary proximity, excavation, overflow, maintenance, seepage and mosquitoes, and requests relocation or additional safeguards.	The proposal includes an underground detention tank, rather than an open basin. HCE's revised report establishes its storage and outlet design. Boundary proximity does not, of itself, establish that the tank must be relocated beneath the car park. The final engineering design and construction methodology must address excavation support, adjoining structures and services, tank integrity, access and maintenance. These matters must preserve the hydraulic performance and protection of adjoining land relied upon in the submitted strategy. The concept drawings are not presented as a completed structural or excavation-support design. The stormwater documentation provides maintenance information for the treatment devices. Ongoing inspection and maintenance of the approved infrastructure are necessary to retain its performance and can be secured through appropriate conditions. Tank access and openings should be detailed to avoid creating a mosquito-breeding hazard. The Applicant maintains the documented location subject to the relevant engineering and construction requirements.
Private water service to 26 Childs Street The owner identifies an active private water service, an existing leak and temporary bypass near proposed works, and seeks protection, continuity and access for maintenance.	The existing service and temporary bypass must be identified and protected before work in the relevant area. The final works should be checked against their confirmed locations, with any unavoidable temporary interruption coordinated with the property representative in advance. Construction should not unnecessarily obstruct reasonable access for inspection or maintenance. The reported leak and any agreed permanent servicing alternative require coordination with the affected owner and, where relevant, Urban Utilities. That does not remove the need to address the development's interface with the active service. This response does not determine service ownership, responsibility for pre-existing defects or the cost of any agreed alteration. Nor does it assume that the adjoining owner has agreed to fund a development-driven relocation. The Applicant's position is that appropriate service protection can be incorporated into the works without making resolution of the existing leak a prerequisite to approval of the childcare use.
Construction impacts and safeguards	The adjoining residential and school environment requires appropriate construction management. Measures can address delivery hours, truck

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Key issue raised by submitters	Applicant response
Submitters seek controls on construction traffic, noise, dust, vibration, property damage, fencing and notification of disruptive works.	access, worker parking, pedestrian safety, dust suppression, erosion and sediment control, noise and vibration. Detailed arrangements should maintain access to neighbouring properties and provide protection during excavation, retaining and boundary works. Temporary fencing, a site contact and advance notice of disruptive activities can form part of that management. The scope of condition surveys, monitoring and other safeguards should respond to the construction method and actual risk. The specific distances, notice periods and blanket requirements requested by submitters should not be adopted without considering their necessity and proportionality. The Applicant supports appropriately framed safeguards and considers these construction matters capable of management without reducing the permanent scale of the proposed use.
Document versions and requested outcome Some submitters report difficulty accessing updated material, identify inconsistencies and seek refusal, reduced capacity or additional conditions.	The amended plans and specialist assessments lodged with the Information Request response are the basis of the Applicant's case. Where objections use superseded inputs, the relevant changes are identified above. This does not dispute an individual submitter's account of difficulty obtaining a document or imply that every concern arises from an outdated version. The parking figures are clarified by reference to the intended layouts, and the Applicant has expressly nominated NMS's requirements as the governing acoustic treatment sought for approval. References to Council's earlier access advice should be read as the advice quoted in the transport report, not as evidence that the development or its future access has already been approved. The Applicant maintains that the amended proposal is appropriate for the site, subject to implementation of the relied-upon mitigation and relevant approval conditions. Requests for reduced capacity, blanket additional buffers or relocation of infrastructure should be considered against the actual planning and technical outcomes, rather than adopted solely because they are requested. The Applicant seeks Council's continued assessment towards approval on that basis.

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