



**City Planning & Sustainability  
Development Services**

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23 August 2022

Yu Li

C/- Plan A Town Planning Pty Ltd

Level 3, 16 McDougall Street

MILTON QLD 4064

**ATTENTION: Emily Hutchinson**

**Application Reference:** A005720167

**Address of Site:** 46 KRAFT RD PALLARA QLD 4110

Dear Emily,

**RE:** Further advice

Council has completed its review of the response to the information request. There are still significant stormwater issues with the proposal as well as conflicts between earthworks and tree retention. Before any favourable decision is made on the application the following information and amendments are required.

**Stormwater**

1. In response to PO2 and PO7 of the Stormwater code a flood study is still required to support the development. The required filling of the site has a high likelihood of impacting surrounding properties adversely.
  - a) Provide a 2D flood study undertaken by a Registered Professional Engineer Queensland (RPEQ) that provides flood immunity for all new lots and roads while ensuring no impacts to neighbouring properties. Approved development flood studies are to be referenced with respect to the applicable flows to use within the flood study, and surveyed levels of 39 Sweets Road, to ensure no adverse impacts; and
  - b) Provide a survey of the existing houses/structures on 38, 45 and 54 Kraft Road, and 39 Sweets Road and demonstrates these are not impacted.
2. The stormwater pipe through proposed Lot 14 will also direct major flows from this site through this lot, which is unsafe and will cause nuisance to the future owner of Lot 14 and limit the use of this land. This outcome does not comply with PO3 of the Stormwater code.
  - a) Provide amended plans that extend the road reserve to the boundary of 38 Kraft Road with stormwater pipes and major flows contained in the road reserve.

Note: If lot 14 were to accommodate a bioretention basin, the road reserve could provide for both the basin and future access to 38 Kraft Road.

3. As previously requested, provide amended plans and reports that show the swale along the frontage of the site as being maintained, with a type G kerb on a 6.25m alignment, to maintain flows along Kraft Road due to the minimal grades along Kraft Road.
4. Water quality treatments to the Queensland State Planning Policy requirements have not been provided in response to PO16 and PO17 of the Stormwater code. The covenant area at the rear is not large enough to warrant any Performance outcome against PO16 and PO17 of the Stormwater code.
  - a) Provide amended plans and reports that include a bioretention basin; or
  - b) Alternatively amend the proposed layout to provide a 20m wide corridor on the eastern property boundary capable of managing stormwater as per the Stormwater code.

### **Servicing and Road Layout**

5. The reduced road width segment ('autocourt') proposed for lots 14 and 15 is still not supported for access and servicing.
  - a) Provide amended plans that include a dedicated road frontage to Lots 14 and 15, or a mixture of road frontage and rear allotments with sufficient refuse presentation demonstrated via a truncation in accordance with the Refuse planning scheme policy (PSP) Section 4.1(4).
6. A turnaround facility for the Refuse Collection Vehicle (RCV) will need to be provided until such time the road network to the south is extended. To ensure a suitable turnaround facility is provided in accordance with Refuse PSP Section 3(5) provide the following:
  - a) Amended plans that include the entirety of Lot 16 contained within a temporary easement;
  - b) Provide Registered Professional Engineer of Queensland certified swept path analysis to demonstrate that a side loading RCV can utilise the turnaround facility.
7. The bin presentation areas for Lots 14,15,16 and 17 presenting to a shared frontage via bin pads is not supported. This Performance outcome is applicable for internal private roads as stated in Sections 3(4) and 4.1(6) of the Refuse PSP.
  - a) Provide amended plans that show kerbside collection points for lots with road frontage accommodated on the frontage of the subject site. The collection points must be fronting the public road as this will be the collection frontage ultimately when the road is extended in the future.
8. It is noted there is a difference in the width of the new road between the proposed subdivision plan of 5.0m (Plan Ref: T0319-POD) and the Transport Impact Statement of 5.5m.
  - a) Provide amended plans that detail the road with a width of 5.0m.

## Vegetation Retention

9. Further detail to demonstrate the retention of vegetation identified on the submitted Tree Retention Plan (TRP) is required. The TRP must identify the proposed development footprint in its entirety including the proposed earthworks and services as shown on the concept engineering plans.

The submitted documentation in response to the information request proposes the stormwater infrastructure to the north of the site through Lot 14 to 38 Kraft Road. The TRP differs and shows the stormwater to the south through to 54 Kraft Road. A revised TRP is required with an assessment of all vegetation that may be impacted by the stormwater infrastructure.

Submitted documentation proposed earthworks to the site boundaries (excluding within the 10m covenant area). The TRP identifies vegetation along these boundaries to be retained.

- a) Provide a revised Tree Survey Plan in accordance with the Biodiversity areas overlay PSP which explores the retention feasibility of the mapped High Ecological Strategic Significance vegetation along the Northern border of the site including:
- i. All trees 150 mm DBH or greater on site/external works area and within 6 m of site boundaries;
  - ii. The proposed development plan (as an overlay) including all services/infrastructure 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 the location of retaining walls;
  - iii. A clear indication of which trees are to be retained and which trees are to be removed, including the following information:
    - i. Scientific name;
    - ii. Height;
    - iii. Diameter of tree trunk at breast height (DBH);
    - iv. Crown diameter;
    - v. Habitat features including hollows and scratch marks, nests etc.
    - vi. Tree Protection Zones (TPZs) (in accordance with AS4970); and
    - vii. General health assessment.
  - iv. Where works encroach into the TPZs of any trees identified to be retained, provide a report from a qualified arborist (minimum AQF level 5 Arboriculture) to demonstrate no negative impacts on the long-term health of the trees.

## Bushfire

11. Figure 10 of the Bushfire Management Plan (BMP) appears to have removed several mapped areas of VHC16.1 that were previously identified in Figure 8 of the BMP. A processing stage has removed these pixels even though these areas have bushfire prone vegetation (i.e., VHC16.1) and are connected to large areas of continuous vegetation. The processing stage appears to remove pixels unless the entirety of the pixel is filled with mapped VHC, which is not an approach supported by Council and does not represent a precautionary approach.

- a) Provide a detailed description of the GIS processing stages used to determine how observed VHC mapping is translated into BPA or PFLI mapping. That is, what proportion

of a cell must be vegetated with a bushfire prone VHC to have the whole pixel mapped and included in PFLI mapping (Figure 8).

12. Some areas of bushfire prone vegetation connected to immediately to large patches of continuous vegetation have been 'filtered' out and treated as corridors even though they're connected to large patches of vegetation that are greater than 50m in width. This processing step does not appear to be in accordance with Step 3(b) of Leonard & Opie (2017) Estimating the potential bushfire hazard of vegetation patches and corridors. Mapped cells east of proposed lot 5 and west of proposed lot 2 are examples of this.

- a) Provide a detailed description and figures of the processing stages i.e. shrinking and dilation by one cell for of how patch and corridor filtering (described in Leonard & Opie, 2017) has been applied in Figure 10 of the BMP to remove areas of bushfire prone vegetation that are connected to large patches of continuous fuel.

Note Council's Technical Assessment guide – Bushfire reporting has been updated. Use of Method 2 using an FDI and fuel loads *other than* those identified in Table B2 require standard parameters to be used including flame temperature of 1200K. All calculations must be updated using this flame temperature. Overstorey or total fuel loads (W) should represent the total potential fuel load identified for the relevant VHC in *Bushfire Resilient Communities* (QFES 2019).

- b) Provide an updated Bushfire management plan based on the layout changes and further information as requested above. Bushfire covenants must be shown on all subdivision plans.

### Locational Requirements

13. It is noted in response to PO4 of the Lower Oxley Creek south neighbourhood plan, reference to the environmental report prepared by MWA environmental prepared for the subdivision at 55-81 Sweets Road, Pallara was provided. The report recommends a buffer is needed to mitigate that impacts of the existing use on the residential development. Given the subject sites differing location to the subdivision at 55-81 Sweets Road, Pallara, an environmental assessment specific to the proposed subdivision is required to demonstrate that adverse impacts from the cropping activity at 54 Kraft Road would not impact safe and healthy occupation of the lots relative to risks for the intended residential use of the lot as per PO4 of the Lower Oxley Creek south neighbourhood plan.

- a) Provide an environmental assessment that considers both air emissions and noise impacts of the existing cropping activity at 54 Kraft Road, would have on the residential use of the proposed lots. The report should include recommendations on mitigation measures that can mitigate the impacts on the proposed use.

### Footprint Plans

14. It is noted the revised plans include building location envelopes (BLE) for the proposed lots.

- a) Provide a separate BLE plan that is fully dimensioned in accordance with the Acceptable outcomes of the Dwelling house small lot code including driveway widths.

## Utilities

14. In response to PO9 of the Infrastructure design code provide a Service Action Notice from Urban Utilities to confirm that the development can be serviced by public infrastructure.

## Plans and Reports

15. Provide amended plans, along with engineering reports and ecology reports (bushfire and tree retention) inclusive of the changes made as a result of responding to this further advice letter.

Email your response to [edasouth@brisbane.qld.gov.au](mailto:edasouth@brisbane.qld.gov.au) quoting the application reference number A005720167.

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

Yours sincerely



Justin Lynham  
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