

23 September 2026

Chief Executive Officer
Brisbane City Council
C/- Steve Zhou, Planning Services
Emailed to steve.zhou@brisbane.qld.gov.au

GPC Job Reference: 24.2241

Dear Steve,

RE: 17 GUNNER STREET, KEDRON QLD 4031
DEVELOPMENT APPLICATION FOR DEVELOPMENT PERMIT FOR A RECONFIGURING A LOT
RESPONSE TO COUNCIL INFORMATION REQUEST – A007067229

1. INTRODUCTION

We refer to Brisbane City Council's ('Council') information request dated 20 August 2026 for the proposed development over land located at 17 Gunner Street, Kedron QLD 4031. The applicant's response to each of these items is set out below and is to be read in conjunction with the following supporting documents:

- **Attachment A:** Architectural plans for the recently developed dwelling at 15 Gunner Street, Kedron
- **Attachment B:** Revised Code Assessment Report prepared by Gaskell Planning Consultants
- **Attachment C:** Stormwater and Bulk Earthworks Concept Plans prepared by RCS Consultants

In our view, the additional material demonstrates that the proposed lots are capable of accommodating dwelling houses, traditional backyard space, landscaping, vehicle access and a lawful point of discharge. The proposal therefore satisfies the relevant performance outcomes and can be approved, subject to reasonable and relevant conditions.

2. RESPONSE TO ASSESSMENT MANAGER'S FURTHER ADVICE

2.1 Item 1: lot sizes

Council's Advice

Whilst it is acknowledged that some lots within the locality are below the minimum 450m² lot size required under Overall Outcome (OO) 6 d. of the Character residential zone code, the proposed lot size being 360m² and the frontage being 9.153 metres represent a significant departure from the minimum lot size and frontage anticipated within the Character zone precinct. Furthermore, the site adjoins lots within the Character residential zone; further fragmentation of the subject site through the creation of the lots below the minimum 450m² is not considered to provide and maintain the established block

pattern or character of the precinct, nor is it considered to provide a consistent and appropriate transition between the Low density residential zone and the Character residential zone.

Provide justification and details that address the requirements outlined under OO6 d. of the Character residential zone code, specifically, how given the small lot nature proposed can accommodate a dwelling while retaining a traditional backyard space along with large trees.

Applicant's Response

The proposed lot size is justified by the physical capacity of each lot and the established subdivision and development pattern in the immediate locality. Each proposed lot is regular in shape, has a frontage of 9.153m and a depth of 39.469m, and will retain direct frontage to Gunner Street. The proposal does not create a rear lot, shared access arrangement or irregular subdivision pattern.

Importantly, the adjoining recently developed property at 15 Gunner Street has the same lot depth of 39.469m and demonstrates a contemporary dwelling form that maintains a 6m setback to Gunner Street and approximately 8.36m between the rear of the principal dwelling and the rear boundary. The architectural plans included at **Attachment A** provide direct, site-specific evidence that a narrow-frontage lot of this depth can accommodate a functional dwelling while retaining a substantial backyard.

The applicant is prepared to adopt a comparable building envelope for each proposed lot, comprising a minimum 6m front setback and 8m rear setback for the principal dwelling. An 8m rear setback across the full 9.153m lot width preserves approximately 73m² of rear yard area on each lot. This materially exceeds the minimum 16m² principal private open space outcome applicable to small lots and provides sufficient depth for usable private open space, deep planting and the establishment of a large backyard tree.

If Council requires additional certainty, the applicant is willing to provide a development footprint plan and house plans reflecting these setbacks and accept a condition requiring that plan to be included with the survey plan documentation. This would secure the intended building envelope at subdivision stage while allowing the detailed design of each dwelling to be resolved through the applicable future approvals.

The 450m² minimum in OO6(d) is directed to maintaining a block pattern capable of accommodating traditional backyards and large trees. In this instance, that underlying outcome is achieved notwithstanding the numerical variation because the proposed lots retain conventional street frontage, sufficient depth and a secured rear-yard envelope. The proposal also reflects the presence of historic and more recent sub-450m² and narrow-frontage lots identified in the Planning Report. It therefore represents a compatible continuation of the local pattern rather than an incongruous form of fragmentation.

On this basis, the proposed reconfiguration maintains the low-density, detached-house character of the precinct, provides an appropriate interface with adjoining residential land and achieves the purpose of OO6(d).

2.2 Item 2: Code Response

Council's Advice

Provide an amended Code Assessment Report which removes the assessment against the Sunshine Coast Planning Scheme 2014.

Applicant's Response

Please find attached the updated Code Assessment Report relevant to the Brisbane City Plan 2014 (**Attachment B**).

2.3 Item 3: Lawful Point of Discharge

Council's Advice

Provide engineering drawing/s showing a proposed stormwater management system and any required earthworks/retaining walls to demonstrate the stormwater runoff from the proposed lots will be

conveyed to a LPD being the kerb and channel of Gunner Street (or existing stormwater infrastructure in Gunner Street).

- a. The engineering drawing/s are to be prepared and certified by a RPEQ as required by the Infrastructure design (ID) PSP Chapter 1.
- b. Alternatively, provide a Consent for Lawful Point of discharge form signed by affected downstream property owner/s, and an engineering plan of proposed stormwater drainage through those properties discharging to the kerb and channel of Somerset Road. Please find a copy of the LPD consent/refusal form attached.

Applicant's Response

The Stormwater and Bulk Earthworks Concept Plans prepared by RCS Consultants are included at **Attachment C**. The plans demonstrate that stormwater from both proposed lots can be collected and conveyed to the kerb and channel in Gunner Street as the lawful point of discharge. The proposed earthworks and retaining walls have been coordinated with the recently completed works on the adjoining properties, with retaining walls limited to a maximum height of 1.0m. Accordingly, each proposed lot can be appropriately drained without reliance on discharge through downstream private property.

2.4 Item 4: Access

Council's Advice

Provide amended drawing/s demonstrating the location of a proposed driveway crossover for Lot 1 and ensure the driveway achieves a minimum 2.0 metre clearance to the existing street tree, and the driveway will not encroach into the frontage of adjoining property.

Applicant's Response

We understand that the street tree identified in Council's request is no longer present. Each proposed lot can therefore be provided with an independent driveway crossover wholly within its respective frontage, without conflict with an existing street tree or encroachment into an adjoining property frontage. The specific 2.0m clearance sought by Council is consequently no longer applicable. The applicant is prepared to provide an amended proposal plan confirming the indicative crossover locations prior to Council's decision. To support replacement streetscape planting, the applicant is also willing to provide two new street trees within the Gunner Street frontage at suitable locations, subject to Council's standard requirements and clearance from driveways and underground services.

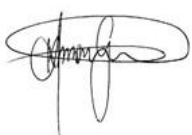
3. SUMMARY

This response addresses each matter raised in Council's information request for the proposed reconfiguration of Lot 3 on RP77165 at 17 Gunner Street, Kedron. The supporting material demonstrates that the proposed lots are functional, serviceable and capable of accommodating detached dwelling houses within a building envelope that preserves conventional front setbacks and substantial rear-yard space.

The proposal achieves the relevant performance outcomes of the Character residential zone code and Subdivision code. Council is therefore respectfully requested to finalise its assessment and approve the application, subject to reasonable and relevant conditions. Should Council require the proposed 6m front and 8m rear building envelope to be formalised, the applicant is prepared to provide a development footprint plan prior to decision.

If you have any further questions, please contact Nathaniel Hickey or Simon Grice of Gaskell Planning Consultants on (07) 3392 1911.

Yours sincerely,



Simon Grice
Director