ASPECT
TOWN PLANNING

FURTHER ADVICE RESPONSE

7 April 2026

Brisbane City Council
Attn: Angela Clearly
GPO Box 1434,
Brisbane QLD 4001

Dear Angela,

RESPONSE TO FURTHER ADVICE LETTER – 140 FRASERS ROAD, MITCHELTON (APPLICATION REFERENCE - A006836143)

On behalf of *Salt Typhoon Pty Ltd*, please find below a full response to the Further Advice Letter sent by Council on 3 February 2026 in relation to the above-mentioned development application.

The following detailed response extracts each part of Council's Further Issue Letter in *italicised* text and provides corresponding responses below.

1. Flooding and Stormwater

The proposal in its current form does not satisfy the assessment benchmarks in relation to managing overland flow and flood immunity. As per the Prelodgement advice, it is strongly recommended that the waterway corridor treatment is revised to limit the earthworks required, and the built form within the waterway area is significantly reduced to retain flood storage on site. The use of flood levees as a countermeasure to flood events is not accepted.

The proposal also results in units 15 to 30 being lower than the overland flow path crossing, creating unnecessary risk of inundation of the lower lying units in the event of culvert blockage. It is recommended that a redesign is undertaken with greater consideration given to how flood immunity is to be achieved for all proposed dwellings and access points.

a) Remove the proposed levees and redesign the proposal so that it adequately addresses the flood overlay and waterway corridor overlay codes in the City Plan 2014 (see further below).

Response to item 1a:

The proposed surface level of the private roads and townhouses adjacent to the channel have been redesigned (lifted) to ensure that the flooded extent does not rely on the vehicle barrier located on the edge of the road adjacent the channel (water level is lower than the edge of the road). It is noted that the vehicle barrier is required from a safety perspective however is not included in the modelling.

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1.1 Flood report

The submitted Flood report is unsatisfactory as there is a lack of clarity regarding the levels of flooding, proposed floor levels and the proposed culvert crossing. Provide an amended RPEQ certified Hydraulic Impact Assessment in accordance with the Australian Rainfall and Runoff Guidebook version 4.2 that includes the following:

a) *Provide the flood level contours at 0.25 metre intervals. This may be required to be 0.1 metre intervals depending on the hydraulic gradient for both existing and proposed scenarios. Also compare volumetric assessment of the flooding for the existing scenarios and the proposed scenarios.*

b) *The flood level and the planning level for units 15 to 30 are indicated as one flood level and one planning level in the hydraulic assessment report, while the area is indicated at different levels on the architectural plans. These units cover the site from the upslope boundary to the downslope boundary and there is clearly a change in flood levels across this range. Provide flood level information as per the information request for assessment to proceed.*

c) *Units south of the culvert crossing are to have planning levels that provide 500mm freeboard to the 1% AEP flood level including for culvert blockage. A severe storm impact is to be included in the assessment as per QUDM 7.2.4 as well as assessing flood impacts for the 0.5% AEP and 0.2% AEP flood events.*

d) *Provide more detail on the internal culvert crossing sizing.*

e) *Ensure all units and the associated retaining walls are not located within the overland flow path.*

f) *Modelling of the proposed flood levels are to include sensitivity analysis if the culverts are partially or fully block and the impact on the proposed units, downstream and upstream properties.*

g) *Clearly state the proposed flood planning levels of the habitable, non-habitable, open space and vehicle manoeuvring in compliance with AO5.1 of the flood overlay code and AO7.1 of the stormwater code. Note as a waterway the 1% AEP is the defined flood level. This is to be consistence across all plans.*

h) *Provide an easement over the 1% AEP indication extent to protect the conveyance and storage of the flooded area.*

Response to 1.1a:

Updated mapping has been provided for all modelled events. The contouring has been provided at 0.25m contours except for the developed 1% AEP, 0.2% AEP and 1% AEP blockage events. For these events, contours have been provided at 0.2m for greater clarity. Contours at less than 0.2m were considered but were unclear.

A volume comparison has been undertaken comparing the volume under the existing and developed peak water levels in the 1% AEP events. It was found that the developed case resulted in a minor loss of storage however the volume of the culverts is greater than the difference. The developed site overall would maintain the existing flood storage volume. Specifically, In the 2% AEP design event the proposed development results in no adverse impact to external properties. Flows from all external catchments are conveyed through the site while maintaining freeboard to the proposed townhouses and culvert crossing. The peak flow at the downstream boundary is reduced when compared to the existing case.

Response to 1.1b:

The habitable and non-habitable floor levels have been updated in the Hydraulic Impact Assessment (refer to Appendix 2). TH 15-30 have been broken up into townhouses that share the same Finished Floor Level (FFL). The flood levels and minimum habitable floor levels have been amended as per the latest revision of the plans. The minimum achieved freeboard achieved has been added to the tables. All proposed townhouses achieve greater than the minimum 0.5m required.

Response to 1.1c:

A Severe Storm Impact Statement (SSIS) has been provided in section 4.4.3 of Appendix 2. The SSIS considers the new culvert crossing as well as the existing crossing at the downstream end of the site. It is restated that the risk assessment for blockage has deemed the proposal to be low and high levels of blockage unlikely. Townhouses south of the culvert crossing have between 0.85-1.00m freeboard in the 1 in 500 year design event. In the provided 1% AEP event with 50% inlet blockage applied flows are demonstrated to be contained within the road and discharge downstream of the culvert crossing. Table 1 below depicts the flood immunity that is achieved in each of the above events.

Table 1: Available Freeboard (Sever Storm Events)

	1% AEP Flood Level (50% inlet blockage) (m AHD) (Achieved Freeboard - m)	500 Year Flood Level (m AHD) (Achieved Freeboard - m)	Proposed Habitable Level (m AHD)
TH 15-18	53.75 (0.25)	53.00 (1.00)	54.00
TH 19-20	53.75 (0.10)	53.00 (0.85)	53.85
TH 21-22	51.20 (2.52)	51.30 (2.55)	53.85
TH 23-24	50.20 (3.29)	50.40 (3.25)	53.65
TH 25-26	50.20 (3.16)	50.40 (3.25)	53.65
TH 27-28	50.20 (3.10)	50.40 (3.25)	53.65
TH 29-30	51.20 (2.43)	51.30 (2.45)	53.75
TH 31-34	50.20 (3.80)	50.40 (3.60)	54.00
TH 35-36	50.20 (1.20)	50.40 (1.00)	51.40
TH 37-39	50.20 (1.80)	50.40 (1.60)	52.00
TH 1-14	53.75 (1.45)	53.00 (2.20)	55.20 *
TH 40-43	50.20 (2.40)	50.40 (2.40)	52.60

*Minimum floor level for town houses 1-14

Response to 1.1d:
The culvert sizes, invert levels have been shown on the Engineering Plans (refer to Appendix 3).

Response to 1.1e:
The retaining walls for the proposed development only encroach in minor ways to the 1% AEP flood extent. The encroachment has been shown to create no additional adverse impact to neighbouring properties and the volume analysis has shown that flood storage has not been impacted.

Response to 1.1f:
A sensitivity analysis has been included. The impacts on available freeboard have been documented in the Table 1.

Response to 1.1g:
Table 2 outlines the Flood Planning Levels (FLP), which shows the minimum freeboard and floor levels to be achieved for habitable, non-habitable, vehicle manoeuvring and open space areas.

Response to 1.1h:
The Engineering Plans (refer to Appendix 3), show the extent of the water level for the 1% AEP event within the waterway.

Table 2 - Flood Planning Levels (Habitable & Non-Habitable Floor Level)

	1% AEP Flood Level (m AHD)	Habitable Freeboard	Minimum Habitable Level (m AHD)	Proposed Habitable Level (m AHD) (Achieved Freeboard - m)
TH 15-18	52.60	0.50	53.10	54.00 (1.40)
TH 19-20	52.60	0.50	53.10	53.85 (1.25)
TH 21-22	51.20	0.50	51.70	53.85 (2.65)
TH 23-24	50.40	0.50	50.90	53.65 (3.25)
TH 25-26	50.40	0.50	50.90	53.65 (3.25)
TH 27-28	50.40	0.50	50.90	53.65 (3.25)
TH 29-30	51.20	0.50	51.70	53.75 (2.55)
TH 31-34	50.40	0.50	50.90	54.00 (3.60)
TH 35-36	50.40	0.50	50.90	51.40 (1.00)
TH 37-39	50.40	0.50	50.90	52.00 (1.60)
TH 1-14	52.60	0.50	53.10	55.20 * (2.60)
TH 40-43	50.40	0.50	50.90	52.60 (2.20)
	1% AEP Flood Level (m AHD)	Non-Habitable Freeboard (m)	Minimum Non-Habitable Flood Planning Level (m AHD)	Minimum Level Achieved (m AHD) (Achieved Freeboard - m)
TH 15-18	52.60	0.30	52.90	54.00 (1.40)
TH 19-20	52.60	0.30	52.90	53.85 (1.25)
TH 21-22	51.20	0.30	51.50	53.85 (2.65)
TH 23-24	50.40	0.30	50.70	53.65 (3.25)
TH 25-26	50.40	0.30	50.70	53.65 (3.25)
TH 27-28	50.40	0.30	50.70	53.65 (3.25)
TH 29-30	51.20	0.30	51.50	53.75 (2.55)
TH 31-34	50.40	0.30	50.70	54.00 (3.60)
TH 35-36	50.40	0.30	50.70	51.40 (1.00)
TH 37-39	50.40	0.30	50.70	52.00 (1.60)
TH 1-14	52.60	0.30	52.90	55.20 * (2.60)
TH 40-43	50.40	0.30	50.70	52.60 (2.20)
Vehicle Manoeuvring (Driveway Spillway)	52.60	0	52.60	53.41 (0.81)
Pool House	52.60	0.30	52.90	54.20 (1.60)
Communal Open Space	53.00	0	53.00	53.90 (0.90)

1.2 Upstream drainage

Additional information is required regarding the provision of an upstream drainage connection. Council records do not reflect the drainage referred to within the Stormwater Management Plan.

Provide the following:

a) Provide evidence of the drainage that is mentioned within the Stormwater Management Plan.

b) Provide an upstream drainage connection that services the upstream properties to the east in accordance with PO11 of the stormwater code.

c) Provide a 1.5 metre wide easement centred over the upstream drainage connection that services the upstream properties in accordance with AO11.1/PO11 of the stormwater code.

Response to item 1.2a:

The Stormwater Management Plan (refer to Appendix 4) notes that a drainage connection is not required for the adjoining properties, as the adjoining properties can discharge to a lawful point without the need for a piped connection through the site.

Response to item 1.2b:

An upstream drainage connection is not considered warranted, as the upstream property can discharge stormwater from the site to the existing waterway or to the kerb and channel on Frasers Rd, both of which are suitable lawful points of discharge. A cut-off drain has been proposed to manage any of the overland flow that may reach the eastern boundary from the adjoining site, but this upstream catchment is minimal, and there is an existing shared access road adjoining the eastern boundary, which is assumed to be able to manage the stormwater flows from this site.

Response to item 1.2c:

An easement has not been proposed, as no upstream drainage connection point has been provided to service the upstream lot.

2. Earthworks

As per above, the extent of earthworks within the waterway corridor is not supported. There are also inconsistencies between the engineering plans and the architectural plans provided.

a) The submitted Site Survey and Engineering plans indicate that the fill long the Western boundary of units 35 to 43 varies from 3 metres to 2.6 metres in height with a 625mm setback. This does not align with the submitted site plans by Angelo Patrick Architect or the Stormwater Drainage plans. Ensure that the proposed earthworks are in alignment between the engineering plans and architectural.

b) Clearly demonstrate the existing and proposed surface levels, retaining wall locations and heights on a concept earthworks plan.

c) Provide cross- sections at regular intervals to demonstrate the extent of cut and fill and retaining wall heights, as required to provide clarity on the proposed site levels and retaining walls.

d) Retaining walls over 1 metre in fill height on the boundary are not supported by Council and should be terraced in accordance with AO2.1 of the filing and excavation code.

Response to item 2a:

The earthworks plans have been updated to coordinate with the architectural drawings and relevant stormwater drainage plans.

Response to item 2b:

The existing contours are shown on the Earthworks Plans, and the proposed surface levels are included. Retaining wall locations are indicated, and heights are shown in the plan and sectional views. The drawings are considered to document all required information clearly and as requested.

Response to item 2c:

Earthworks cross-sections have been provided at regular intervals to demonstrate extent of cut and filling and retaining walls. Cross-sections also clearly indicate the height of the retaining walls.

Response to item 2d:

Any retaining walls over 1.0m have been shifted back from the boundary and terraced in accordance with the Filling and Excavation Code.

3. Traffic

The submitted information request response 'Technical Traffic Memorandum' has been reviewed, however, there are still concerns about pedestrian/vehicular conflict within the development and lack of pedestrian amenity.

a) Demonstrate that a minimum dedicated pedestrian pathway width of 1 metre is achieved through the entire site (barring TH35 as shown), separate from the minimum 6.5 metre wide access aisle for car and service vehicles.

b) Confirm that the pedestrian guardrail on the northern side of the culvert is extended up and around to the garden area to the northwest.

c) Plans to reflect sufficient space for the installation of a pedestrian guardrail on the northern side of the culvert.

d) Provide details of how each refuse storage areas will be accessed, and how safe pedestrian standing areas are provided around each entrance

The amended traffic report should be certified by the signing RPEQ.

Response to item 3a:

The plans have been amended to provide a dedicated 1.0m pedestrian path adjacent to the 6.50m road carriageway. Pedestrian crossings are provided throughout the development to link the dedicated path to the residences.

Response to item 3b:

It is confirmed that the pedestrian guardrail on the northern side of the culvert is confirmed to be extended up and around the garden area to the northwest.

Response to item 3c:

The plans have been annotated to reflect there is sufficient space for the installation of the pedestrian guardrail, which is considered appropriate for the DA stage. Specifics will be provided during the detail design phase.

Response to item 3d:

Swept paths for the proposed refuse enclosures have been reproduced for the updated development plan set. The updated swept path is majorly the same as the previously produced swept paths and continue to provide sufficient clearances to obstructions in accordance with AS2890.

The Refuse Collection Vehicle (RCV) will sit within the culvert bridge on the left side of the road while bins are transported from the enclosure to the rear of the truck. The bin enclosure door is proposed to open outward towards the culvert bridge for direct and logical access to the rear of the RCV for rear loading. The provided pedestrian path network does not interfere with this loading arrangement and stays completely clear of this area.
Similarly, for collection of bins within the northern enclosure, the vehicle will sit as shown on the swept path, directly north of the enclosure of bins to be logically and directly accessed. The surrounding pedestrian network does not interfere with these servicing arrangements.

It has been recommended that refuse collection vehicle warning signage within the paring aisle, adjacent spaces #6-10 to improve understanding of the refuse vehicle movements.

On a weekly basis refuse collection occurs infrequently and for a short duration of time. Refuse collection typically occurs early morning and pedestrian activity is not expected to be significant. Traffic volumes are anticipated to be low and sightlines for pedestrians surrounding each refuse enclosure is clear. It is considered that conflict risk between pedestrians and refuse activities to be low, as outlined in the revised RPEQ Traffic Response (refer to Appendix 5).

4. Waterway corridor/deep planting

The proposal does not currently meet City Plan 2014 requirements in relation to the Waterway corridor overlay, nor is it clear how deep planting will be provided within and around the waterway due to the retained areas proposed.

The updated ecological reporting has confirmed that all native trees from within the waterway corridor are proposed for removal, along with 300mm of 'in-situ material' to be removed and replaced with stone pitching. Stone pitching is proposed to cover a significant portion of the waterway and this, in combination with the

existing concrete channel on the southern end of the corridor, will reduce the extent of rehabilitation provided. Accordingly, deep planting cannot be provided within this area at all.

While it is acknowledged that some engineering works to the corridor may be required from a stormwater conveyance perspective, alternative solutions are required so that the development can meet PO6 of the Waterway corridors overlay code including the protection and enhancement of waterway values, existing landscape character, and deep planting areas can be supported.

a) Provide an amended plan demonstrating:

i) Retention of as many native trees as possible within the mapped waterway corridor and other areas.

ii) A development layout that preserves vegetation within the waterway corridor and along site boundaries, with all retained trees shown with applicable TPZ (radius calculated per AS4970).

iii) An earthworks plan identifying retained trees and associated TPZ.

iv) *An updated Arborist report prepared by an experienced AQF Level 5 qualified arborist, detailing protection measures where works within a TPZ are unavoidable.*

b) To support this development application, provide the following:

i. Revised stormwater management solution that would allow for the retention of trees as per above.

ii. An updated stormwater management plan that removes the stone pitching proposed within the corridor so that this area can be rehabilitated. Where any part of the proposed development will create shading within the waterway corridor and which will compromise healthy plant growth, development design must also be modified; and

iii. Amended plans that clearly indicate areas that are now proposed as 'deep planting' of minimum 1,280m² across the site.

Response to item 4a (i) & (ii):

We note that many of the trees in the waterway corridor are exotic and those that are native will be impacted due to the development encroaching with the TPZ of these trees. Notwithstanding this, it is proposed to retain 3 trees (Tree 16, Tree 20 and Tree 21), which are the considered to be trees that will be least impacted from the proposed development given their central location within the corridor. In addition, Tree 21 has a large canopy spread and is approximately 20.0m in height, therefore, ensuring a large shade tree is retained.

Response to item 4a (iii):

An earthworks plan has been provided in Appendix 6, which shows the trees to be retained and the extent of works around these trees. We note that no excavation will impact the trees within the waterway corridor, although fill will be placed over some of the TPZ areas.

Response to item 4a (iv):

An Arborist Report response has been provided in Appendix 7, which outlines the protection measures for works within the TPZ areas.

Response to item 4b (i):
A revised stormwater management plan has been submitted, which shows the retained trees in the waterway corridor.

Response to item 4b (ii):
The stone pitching has been removed from the waterway corridor.

5. Landscaping plan/ communal open space/street trees

Provide an updated Landscape Concept Plan and Arborist Report/Tree retention plan demonstrating the following:

a) Details about planting areas along driveways to accommodate large shade trees with adequate soil volumes and clearances to ensure long-term tree health. Where trees are provided within communal open space, demonstrate how these trees will enhance the shading and utilisation of the communal open space, e.g. placed around communal seating or play areas, etc.

b) Green space areas abutting the waterway corridor to comprise a planting palette of native plant species mix (consistent with species present within RE12.11.3).

c) Ensure a minimum of two (2) metres between the new driveway access and the street trees on Frasers Road. Where a street tree is proposed to be removed, identify and assess its existing condition within the updated Arboricultural report/Tree retention plan.

Response to item 5a & b:
An updated Landscape Concept plan will be provided, which will demonstrate the shading in the Communal Open Space Areas, and a native plant species mix abutting the waterway corridor.

Response to item 5c:
One existing street tree is to be removed as part of the proposal (refer to Figure 1). The crossover will be greater than the 2.0m from the nearby street tree.

It was confirmed by the previous assessment manager that there was no issue with the removal of the street tree, nor was it raised in the previous Information Request.

Notwithstanding the above, the applicant will accept a replacement street tree condition.

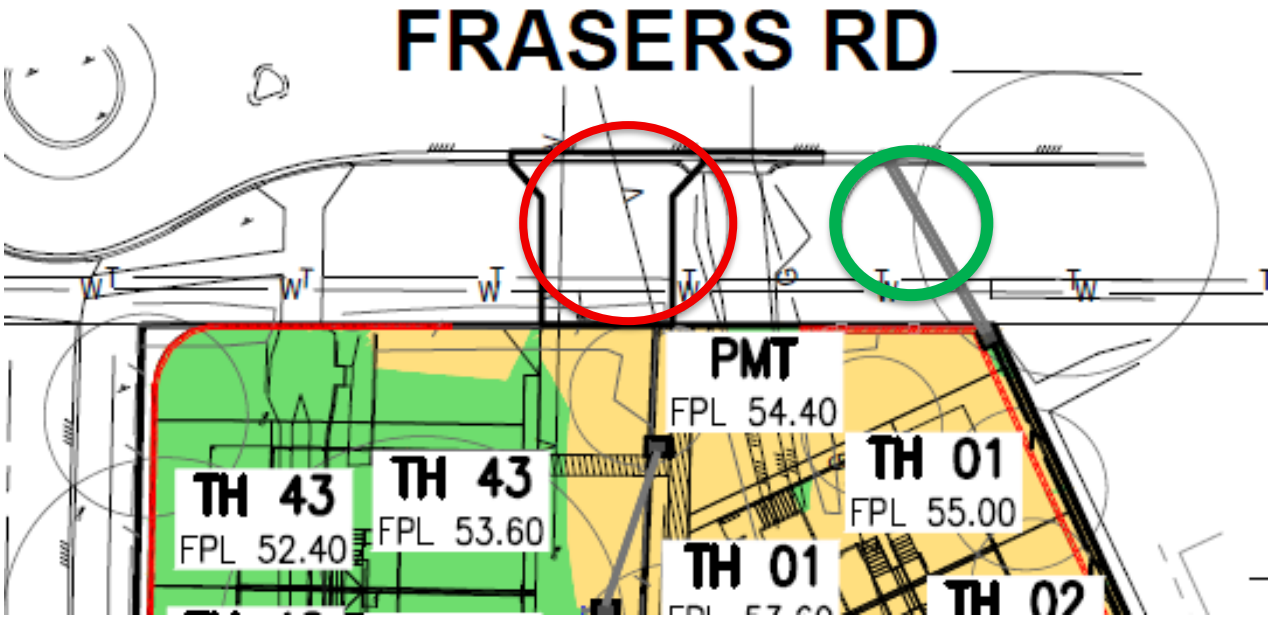


Figure 1: The proposed tree to be removed in red and the nearby tree in green.

6. Architecture/design

Changes to the design of the townhouses has reduced their bulk and scale, which is a positive, however, the windows facing north and north-west (e.g. Module 13 rear elevation) do not appear to receive adequate shading/weather protection from the elements.

There is also still a concern about the lack of orientation of the two townhouses to the street frontage as no balconies have been orientated to the street. The Information Request response to this matter is not satisfactory. Main living areas and windows have not been designed to provide casual surveillance of the street.

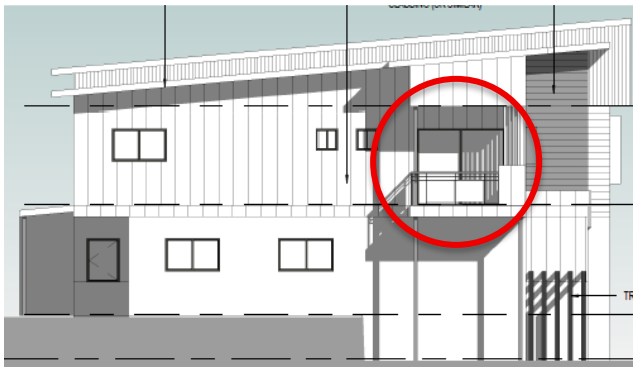
a) Provide amended plans showing balconies for TH1 and TH43 facing the street.

b) Provide amended plans showing window projections/hoods that better address the subtropical design requirements of the Multiple dwelling code, particularly windows facing north and northwest. The development should also ensure that the 1m wide footpath is separate to the vehicle access and distinct in terms of the underlying substrate and materials e.g. exposed aggregate concrete or brick pavers for the pedestrian path to contrast with finish for the driveway. The driveway entry from Frasers Road also requires further variation to limit visual amenity impacts to the street.

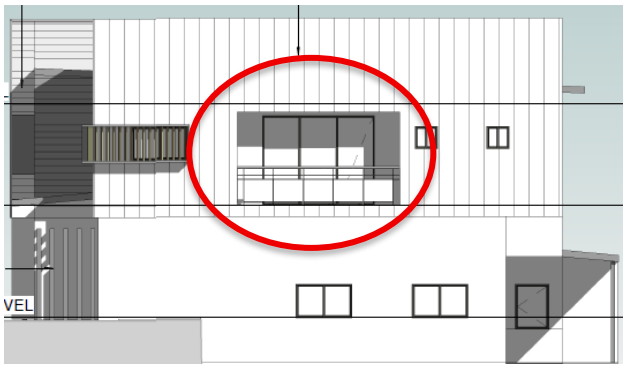
Response to item 6a:

Balconies have been incorporated for TH1 and TH43, where facing the street (see below).

TH1



TH43



Response to item 6b:

The plans have been updated to include:

- The inclusion of window projections and hoods on the north and northwest elevations.
- A dedicated 1.0m wide pedestrian footpath is provided, which will be distinct to the existing internal roadway, through the use of a different material.

The information contained herein provides a response to the matters raised in Council's Further Advice Letter. On behalf of the Applicant, we request that Council proceed with its assessment of the development application.

If you have any further questions, please do not hesitate to contact the undersigned on 0435 812 611.

Kind Regards,

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Enc: Appendix 1 – Proposed Plans
Appendix 2 – Hydraulic Impact Assessment
Appendix 3 – Engineering Services Report
Appendix 4 – Stormwater Management Plan
Appendix 5 – Traffic Response
Appendix 6 – Earthworks Plan (Tree Retention)

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Appendix 7 – Arborist Response
Engineering Response Letter
Response to WRM Submission

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