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Thursday, 5 November 2026

Chief Executive Officer
Logan City Council
PO Box 3226,
Logan City DC Qld 4114

Attention: **Tara Green**
Via email: development@logan.qld.gov.au

RE: RESPONSE TO INFORMATION REQUEST

Reconfiguring a lot (1 into 4 lots)
COUNCIL REF: RL/78/2026
18 Springlands Drive, Slacks Creek QLD 4127
Lot 20 on RP89076

Dear Tara,

I refer to the Information Request received from Logan City Council dated 24 June 2026 in relation to the development application lodged for a Reconfiguring a lot (1 into 4 lots) at 18 Springlands Drive, Slacks Creek. On behalf of the applicant, Steffan Harries provides the following response in addition to the following attachments:

- **Appendix A – Revised Survey Plans**
- **Appendix B – Revised Engineering Plans**
- **Appendix C – Bushfire Report**

Matter Raised:

CRITICAL CONCERNS – FLOODING

1. CRITICAL CONCERNS – FLOODING

Council officers have critical concerns with the proposed development. Temporary Local Planning Instrument (TLPI) No. 1/2024 commenced on Thursday 6 March 2025, giving effect to updated risk-based flood mapping and policy for Logan. The subject site is located, and development proposed within, the Low, Moderate, and High flood risk areas and High flow area of the Flood hazard overlay, and therefore the Flood hazard overlay code (with TLPI No.1/2024) is an applicable assessment benchmark. Acceptable Outcome (AO)19 and Performance Outcome (PO)19 of the Flood hazard overlay code states that during the defined flood event (DFE), each proposed lot must have:

(a) Flood-free or low flood hazard vehicle access to a road above the flood level; and

(b) Flood-free or low flood hazard vehicle route that leads to a suitable flood-free area that contains essential goods to serve the needs of people. Planning scheme policy (PSP) 10 – Flood provides further guidance, and defines essential goods as including food, water, and prescription medication. The nearest suitable flood-free areas that contain these essential goods would be the Hyperdome Shopping Centre and associated Shops along Bryants Road to the east. The Pacific Highway Service Road inundates in both directions to the east and west during the 1% AEP Flood event (the defined flood event). Hazard category 1 (H1) illustrated in dark blue is classified as low flood hazard. Figure 1 below shows that the flood hazard category for inundation along the Pacific Highway Service Road as being H3 to H6, noting that the Pacific Highway Service Road also inundates beyond H1 at the Mandew Street overpass and intersection of Murrays Road/Mandew Street. 2 Figure 1: Flood hazard category – 1% AEP River Event The requirements of AO/PO19 are repeated within the Overall outcomes and Purpose of the Flood hazard overlay code as follows:

1. *The purpose of the Flood hazard overlay code is to ensure development:*

(a) *avoids flood risk or where not possible to avoid, mitigates the exposure of people, property, infrastructure and the environment to a tolerable level of flood risk;*

(b) *maintains the accessibility and functionality of Essential community infrastructure activities and Vulnerable use activities during and after all flood events;*

(c) *improves the resilience of buildings to flood risk, while maintaining built form and amenity expectations;*

(d) ***supports safe, self-evacuation and does not increase the emergency management response or recovery burden;***

(e) *increases the community's resilience to flood risk and minimises flood recovery time;*

(f) *does not result in unacceptable flood risk to people, property, infrastructure and the environment;*

(g) ***minimises the exposure of people to isolation during flood events;***

(h) *maintains the natural functions of the floodplain for the storage and conveyance of floodwaters and avoids adverse impacts on overland flow paths.*

2. *The purpose of the Flood hazard overlay code will be achieved through the following overall outcomes:*

(m) *Development does not add to emergency management or the evacuation burden during or after a flood event.*

(n) *Development:*

i. *involving an accommodation land use or new lots intended for a future dual occupancy (auxiliary unit), dwelling house or accommodation land use, has safe vehicle access to a low flood hazard road and road network that supports safe and efficient access to a suitable flood-free area that contains essential goods;*

ii. *not involving an accommodation land use (or new lots intended for a future accommodation land use) or Vulnerable use activities, has safe vehicle access to a low flood hazard road that supports safe and efficient self-evacuation, or is only isolated for a short duration from creek or overland flow flooding and has safe refuge available during flood events;*

iii. *plans for the orderly and safe evacuation of people, including being supported by a flood emergency management plan in particular circumstances;*

iv. ***does not rely upon flood emergency management plans to alter land use tolerability to flood risk. Editor's note - Flood emergency management plans should be utilised to assist in managing residual risk of development and should be implemented as a tool to plan for safe evacuation where an active management entity exists for the development. The proposal also does not comply with specific outcomes 3.10.2.1(1) and (3) of the Natural hazards and climate change theme of the Strategic framework:***

3. *People and premises are protected from and are resilient to natural hazards, taking into account the potential effects of climate change over time, having regard to:*

(b) ***flooding and inundation;***

4. *Development manages the risks associated with flooding by:*

(e) ***supporting safe self-evacuation and not increasing the emergency management response or recovery burden;***

(h) ***minimising the exposure of people to isolation.***

Further Advice

In consideration of the above, the proposed development does not comply with the Flood hazard overlay code or the Strategic framework, and therefore conflicts with the planning scheme in its entirety. On this basis, Council officers intend to recommend the application for refusal if not withdrawn prior.

Response:

The proposal has been amended to reduce the original 1 into 4 lot subdivision to a 1 into 3 lot subdivision, resulting in a net increase of only two additional lots. This reduction further limits the scale of the development and its potential impact on the existing road network. The relatively minor increase in residential lots does not materially alter the existing isolation exposure or flood-related access constraints experienced by the surrounding area.

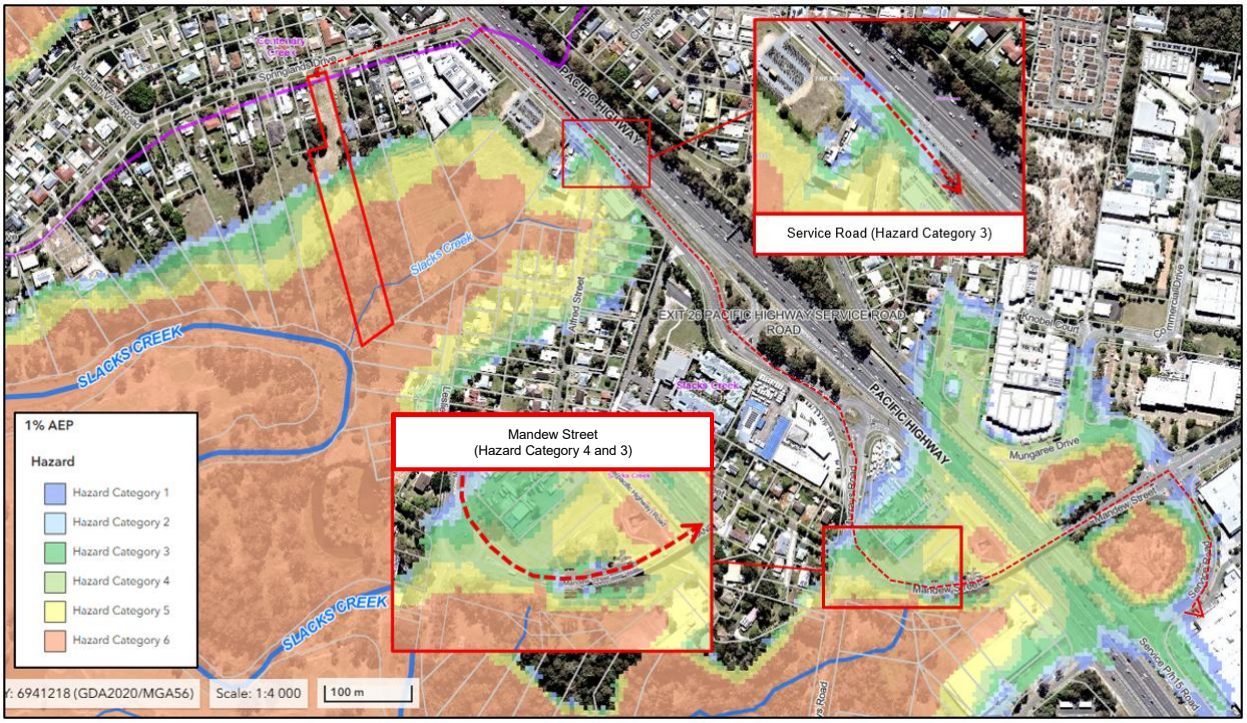
Access to the road network – AO19(a)

Each proposed lot has flood-free vehicle access to Springlands Drive. The proposed crossover sits at approximately RL12.4m AHD (Conceptual Services Layout Plan, DA1-2 Rev P2), around 1.5 metres above the defined flood level of 10.9m AHD. AO19(a) is satisfied.

The applicable benchmark is PO19

Council's concern relates to the essential-goods route in AO19(b). The acceptable outcome is only one way of meeting the performance outcome. PO19 does not require a flood-free route. It requires "a low flood hazard vehicle route to a suitable flood-free area that contains essential goods to serve the needs of people". The route from the subject site to the Hyperdome is safest travelled by Service (Pacific Highway) Road and Mandew Street. The vehicle route from the site to essential goods via Mandew Street reaches a maximum flood hazard of H4 at the base of the overpass during the defined flood event, not H5 or H6 as indicated. Beyond that location the route is low flood hazard.

The affected section along Service (Pacific Highway) Road is approximately 26m in length (Hazard Category 3), while the affected section along Mandew Street is approximately 100m in length, ranging from Hazard Category 3 to Hazard Category 4 (**See image below**). Both sections remain subject to low flood hazard in events up to and including the 1% AEP flood level. Any resulting isolation would be short in duration and occur only during rare flood events. Importantly, occupants have access to safe refuge on-site above the Probable Maximum Flood (PMF) level. Accordingly, the proposal does not give rise to the prolonged isolation that PO16 to PO19 are intended to address. The proposed development therefore achieves the intent of the Code by minimising the exposure of people to isolation during flood events and ensuring flood risk is mitigated to a tolerable level.



The proposal meets the purpose and overall outcomes of the code
The purpose of the Flood hazard overlay code is not to eliminate flood risk. It is to mitigate exposure "to a tolerable level of flood risk" and to "minimise the exposure of people to isolation during flood events" (8.2.5.2(1)(a) and (g)). The proposal does both:

- Future dwellings on each lot will be built to the minimum flood planning levels of Table 8.2.5.3.3, with habitable rooms at the defined flood event plus 500mm freeboard. Occupants are not exposed to inundation within their homes during the defined flood event.
- The site is identified as a High flood island. Its highest ground (18.1m AHD) sits above even the probable maximum flood level (17.4m AHD). In the very worst case, occupants have safe, flood-free refuge on their own land and do not need rescue. The emergency response burden 8.2.5.2(1)(d) is concerned with is not increased.
- Planning scheme policy 10 confirms that PO16–PO19 are aimed at "long-duration isolation". The route constraint Council has identified affects the regional road network. It does not affect the site, its access or Springlands Drive.

The constraint is existing, not created by this development
The flood hazard on the Pacific Highway Service Road, at the Mandew Street overpass and at Murrays Road/Mandew Street is an existing feature of the road network. Every dwelling in Springlands Drive and the surrounding established residential area already relies on that network. The proposal does not create or exacerbate this existing hazard, nor does it rely on any new road infrastructure through these affected areas.

The proposed TLPI No. 1/2026 further supports the development through its revised approach to flood risk, access and isolation, recognising that development may be appropriate where adequate flood-free refuge is available and risks can be managed to an acceptable level. The proposed subdivision aligns with this policy direction, providing minimal flood-risk access to Springlands Drive, and sufficient access to safe refuge during flood events.

Therefore, the proposal meets AO19(a) and PO19, and achieves the purpose of the Flood hazard overlay code. Development and habitable floor levels sit above the defined flood event, safe refuge is available on site above the probable maximum flood, and the proposal does not worsen the existing condition of the road network.

If you have any concerns regarding the justification provided, please raise them prior to a decision being made so that we can work through and address them accordingly.

Matter Raised:

2. PLANNING

PLANNING Plan of Development

(a) Confirm if Lot 1 will be taking access from the shared driveway or directly from Springlands Drive.

Response:

Lot 1 will share the access driveway with rear lots as per **Appendix A** revised survey plans and **Appendix B** revised engineering plans.

Matter Raised:

(b) Provide amended plans of development that include the required easements for sewer and water infrastructure.

Further advice: Items 5.1 and 5.3 provide further guidance on easement requirements, including minimum widths.

Response:

Please refer to **Appendix B** for all easements.

Matter Raised:

(c) Demonstrate how a dwelling house can be accommodated on Lot 3 without encroaching into the required sewer easements.

Further advice: A 150mm diameter sewer main traverses the northern part of the site in an east-west direction, located within proposed Lots 3 and 4. Therefore, a minimum 3-metre-wide easement centred over the sewer main is required, which will cut across the middle of Lot 3, in addition to the access and services easement over the driveway. Demonstrating that a dwelling can be sited within Lot 3 without encroaching into any of the easements will aid in demonstrating compliance with PO3 of the Reconfiguring a lot code.

The lot layout has been revised to reduce the subdivision to three lots, with an easement incorporated over the proposed sewerage infrastructure (refer to **Appendix B**). This ensures Lot 2 retains a sufficient area of 919m² to accommodate a dwelling house without encroaching upon the sewerage easement. Thus, complying with PO3 of the Reconfiguring a Lot code.

Matter Raised:

3. ENVIRONMENT

Bushfire Hazard Area

(a) The proposed development is located in a mapped Bushfire Hazard Area as identified on overlay map OM-03.00 of the Logan Planning Scheme 2015. Provide a bushfire hazard

assessment in accordance with Planning Scheme Policy 6 Management of Bushfire Hazard Part 1 of the Logan Planning Scheme 2015 to determine the actual level of bushfire hazard.

Response:

Please refer to **Appendix C - Bushfire Report**. The summary of this document identifies the actual bushfire hazard level.

Matter Raised:

(b) Should the assessment of the category of bushfire threat be identified greater than 'Low', submit to Council for approval a bushfire management plan in accordance Planning Scheme Policy 6 Management of Bushfire Hazard of the Logan Planning Scheme 2015.

Response:

Please refer to the Bushfire Hazard Assessment Report and Bushfire Management Plan prepared by Max Bushfire Protection Consulting (**Appendix C**) which addresses both matters raised.

Matter Raised:

4. ENGINEERING

Compensatory Earthworks

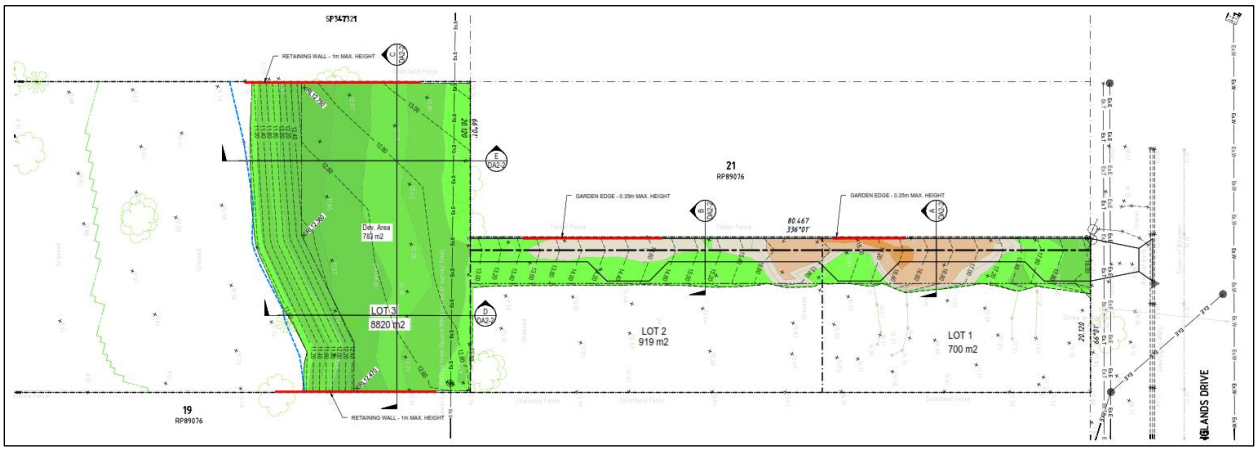
(a) Provide amended earthworks plans that show details of volume calculations for cut and fill below the defined flood level (1% AEP). Include notations of cut and fill areas marked on a detailed site plan with cross sections indicating existing and finished surface level with volume calculations for any compensatory earthworks. Compensatory areas of cut must be below the defined flood event, free draining with a cut/fill batter no steeper than 1V:4H.

Further advice: The above is required to demonstrate the development will ensure there are no losses of conveyance capacity of and storage so as not to adversely affect other premises, infrastructure and the environment and the development will result in no loss of floodplain storage up to the Defined Flood Event.

Response:

Please refer to **Appendix B** for the revised engineering plans, which demonstrate the proposed filling and earthworks will achieve a finished level of approximately RL 12.4m AHD, exceeding the 1% AEP flood level of RL 10.9m AHD. As illustrated in the engineering drawings, the proposed works will not adversely impact the remaining lots, adjoining properties or Lot 3. Appropriate provisions have also been incorporated to ensure that all existing services, including stormwater infrastructure, can be suitably relocated and accommodated.

As shown below, the blue dashed line represents the 1% AEP flood level, which remains unaffected by the proposed earthworks.



Matter Raised:

Access

(a) Amend the crossover to be constructed in accordance with IPWEA standard drawing RSD- 102 (heavy duty) for refuse vehicles to carry out on site refuse collection.

Response:

Please refer to the Engineering Report (**Appendix C**), which addresses this matter at the concept level appropriate to a reconfiguring a lot application. The amended crossover incorporates passing bays and appropriate truncation to accommodate street access for the three lots. As on-site refuse collection is not required, the proposed arrangement is considered compliant.

Matter Raised:

ENGINEERING - Access

(b) Provide a passing bay for every 30m length of the access driveway in accordance with Table in PSP 5 – Infrastructure.

Response:

Please refer to the Engineering Report (**Appendix C**), which addresses this matter at the concept level appropriate to a reconfiguring a lot application. The amended crossover incorporates 2 passing bays approximately 20m apart, with appropriate truncation to accommodate street access. Thus, it is compliant with Table in PSP 5 – Infrastructure.

Matter Raised:

ENGINEERING - Service

Service

(d) Provide on-site refuse collection in accordance with Table 3.4.5.1.2 in PSP 5 – Infrastructure and demonstrate through swept path analysis that a 10.3 metre long refuse collection vehicle can enter and exit the site in a forward gear, undertaking a maximum of one (1) three-point turning manoeuvre.

Response:

Not Applicable as the lot size has been reduced to three lots thus an on-site refuse collection point is not needed as per Table 9.4.6.3.4 of the Reconfiguration of a lot code.

Matter Raised:

WATER AND SEWER - Water

5. WATER AND SEWER Water

(a) Provide an amended Concept Services Plan incorporating the following:

i. Provide a minimum 6 metre wide easement over the proposed Council water main within the driveway, in accordance with the SEQ Code; and

ii. Extend the water main along the full frontage of the development site, including provision for future extension, incorporating appropriate valve and fire hydrant arrangements.

Response:

This has been completed within **Appendix B – Revised Engineering**.

Matter Raised:

WATER AND SEWER - Water

(b) Amend the driveway easement to include a flare at the frontage, ensuring that all private water services from the meters do not encroach onto adjoining private properties. Water service connections must be connected to the main with a minimum clearance of 600 mm between tapping bands.

Response:

Please refer **Appendix B – Revised Engineering**.

As they show a fare at the frontage and the extension of a new DN100 water main from Springlands Drive along the access driveway, separate water meters, and provision of an end-of-line fire hydrant, consistent with AO2 of the Infrastructure code

The 600mm tapping band clearance is a matter of detailed engineering design and can be appropriately resolved at the detailed design stage. Accordingly, we request that Council defer finalisation of the tapping band clearance, in accordance with the SEQ Water Supply and Sewerage Design and Construction Code, to the Operational Works and/or Plan Sealing approval stage, rather than requiring this detail to be resolved through an amended concept plan prior to the application decision.

Matter Raised:

WATER AND SEWER - Sewer

Sewer

(c) Provide an amended Conceptual Sewer Services Plan demonstrating the intended servicing for all allotments within the proposed development, making provision for the following:

i. Any easements required over any sewerage infrastructure within private property in accordance with the South East Queensland Water Supply and Sewerage Design and Construction Code (SEQ D&C Code);

ii. Provide a 10 metre easement over the existing 1500 mm trunk sewer main crossing the subject site

iii. Provide three (3) metre easements over the existing 150mm sewer main crossing

iv. Provide a four (4) metre easement where the proposed sewer main is located within the same easement with the proposed stormwater; and

v. Provide a one-metre-wide access easement from a designated road reserve to the sewer maintenance structure, when the sewer maintenance structure is not located along the frontage of the proposed allotment.

Response:

Please refer to the **Revised Engineering Report** (**Appendix B**).

i. All easements are provided within the property boundaries
ii. Easement over existing 150mm sewer main crossing site has been drawn
iii. 3m easement over the existing 150mm sewer main crossing has been drawn
iv. 4m easement for proposed stormwater and sewer main has been drawn
v. 1m wide access easement from a designated road reserve to the sewer maintenance structure has been proposed between Lot 2 and Lot 3.

The report identifies a 150mm sewer main traversing the northern part of the site, for which a 3m wide easement is shown, consistent with Acceptable Outcome (AO)2 of the Infrastructure code requiring connection to the sewerage network in accordance with the SEQ Water Supply and Sewerage Design and Construction Code. A 1m wide sewer access easement to the maintenance structure, where not located at the lot frontage, is also shown on the Conceptual Easement Plan. All relevant easements have been provided in the revised plans with correct widths across all affected infrastructure.

As per section 13.2 of the DA Rules, this letter provides a response to:
1. all of the information requested; or
2. part of the information requested; or
3. a notice that none of the information will be provided.

Should Council have any outstanding issues associated with the information provided within this report, we formally request that Council informs us prior to making a decision.

Kind regards,

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Alexander Steffan | Director
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