



Dedicated to a better Brisbane

01 June 2026

Sunstate Civil Construction
C/- Urban Strategies Pty Ltd
PO Box 3368
SOUTH BRISBANE QLD 4101

ATTENTION: Blair McPherson

Application Reference: A006866747
Address of Site: 42 REDHEAD ST DOOLANDELLA QLD 4077

Dear Blair

RE: Information request in accordance with the Development Assessment Rules

Council has carried out an initial review of the above Changed application and has identified that further information is required to fully assess the proposal.

The proposed staged development is required to demonstrate compliance with the planning scheme at each stage. It appears that currently the development is considered wholistically rather than in stages, for example the submitted report states proposed staged development will include the dedication of the drainage reserve in stage one (1).

In addressing the planning merits of each stage - including but not limited to ecology, stormwater, setbacks, building separation, site cover, and landscaping and functionality - it is anticipated that the dwelling density will decrease to be more aligned with the outcomes anticipated in the Emerging community (EC) zone and the Doolandella neighbourhood (DN) plan.

Bushfire

- 1) The site is mapped within the Bushfire overlay. A site-specific bushfire hazard assessment report and bushfire management plan for the proposed MCU development has not been submitted. The Bushfire overlay code requires development to demonstrate that development will not be exposed to intolerable levels of radiant heat (i.e. $>29\text{kW/m}^2$) (PO1), minimises bushfire risk from build-up of fuels around buildings and structures (PO2), is designed to facilitate safe and efficient emergency services access and egress to/from the site (PO4) and makes adequate provision for fire-fighting requirements, including water supply (PO6). Assessment against Section A and Section B of the Bushfire overlay code is required. Consideration of the proposal as a staged development must also be addressed.
- 2) The submitted Vegetation Retention Plan BAL Setbacks (Drawing No. S523190_VRP_004, BCC received 05/05/2026) identifies proposed development, including Townhouses 12 and 13, within the bushfire management zones (i.e. areas exceeding a radiant heat flux of 29kW/m^2). This does not comply with PO1 of the Bushfire overlay code and is not supported.
- 3) Communal open space (COS) and deep planting areas are shown to be located within the bushfire management zone which has not been addressed. Landscaping must not create an unacceptable risk to people or property and must support the ongoing management of bushfire risk (PO13).

- 4) The following information is to be provided:
- a. A site-specific bushfire hazard assessment and management plan prepared in accordance with the Bushfire Planning Scheme Policy or an alternative approved methodology. Bushfire Reporting and hazard assessment guidelines are available within the [technical assessment guide for Bushfire reporting](#) available on Council's website. The assessment must also consider the ecological requirements and increase in retained values and rehabilitation as outlined below.
 - b. An assessment against Sections A and B of the Bushfire overlay code, informed by the bushfire assessment and staged development context.
 - c. Updated development plans incorporating required layout changes based on the bushfire assessment and overlay code provisions (i.e. development sited to achieve radiant heat flux of 29kW/m² or less). Plans must clearly identify bushfire management zones and setbacks within the staged development. Bushfire management zones are to be contained within the development footprint; impacts to, removal of or reduction in the ecological values will not be supported.

Ecological values

- 5) The proposed development will impact the ecological values of the site, mapped under the Biodiversity areas overlay (HES/HES/KHA) and the Waterway corridors overlay (Local waterway corridor). While the mapped waterway corridor has been historically modified, it remains ecologically significant within the Blunder Creek catchment and contains in-situ values as identified in the submitted Ecological Assessment Report.
- 6) Amendments to the proposed development and updated supporting documentation are required to demonstrate compliance with PO4, PO7, and PO8 of the Biodiversity areas overlay code, and PO1 and PO6 of the Waterway corridors overlay code. Please refer to attached plan for required Environmental Protection Zone to demonstrate the protection, conservation and restoration of the site's values. The following information is to be provided:
- a. Updated proposed plans, Vegetation Retention Plan (VRP), Arborist Report, engineering plans and Concept Rehabilitation Plan (CRP): clearly identifying the
 - i. One (1) Environmental Covenant as required per Council's plan and Bushfire Covenants as determined by the bushfire reporting (note bushfire requirements above). No encroachment into the Environmental Covenant is permitted, except for essential sewer and stormwater infrastructure.
 - ii. Retain T81, T56, T21, T22, T24, T25, and T9 within an Environmental Covenant, with no encroachment of development within their notional root zone (NRZ)/tree protection zone (TPZ).
 - iii. As required by the Project Arborist in the submitted Arborist Report removal of earthworks from the NRZ/TPZ of T7, T8, T92 and T94.
 - iv. Provide the sewer pipe specifications including location of start and end pits, depth and width of sewer pipes and all connection points. This includes detail for Stage 2 sewer works.
 1. Identify if benching or shoring will be required, details of stockpile requirements and whether construction access is required along the side of the excavation.
 2. Detail the construction methodology to undertake works in the channel of the creek, creek bed and creek banks, including any requirement for waterway barrier works.

3. Detail any ecological features potentially impacted within the construction alignment within the waterway corridor and appropriate mitigation measures/protection for these features.
 - v. Resolve the discrepancies regarding tree retention between the Arborist Report and the VRP (e.g. T59 and T60 are identified for retention in the Arborist Report but shown for removal in submitted plans).
 - vi. Identify only vegetation proposed for retention or removal. Previously removed vegetation as identified in the Arborist Report is to be removed from plans.
 - vii. An updated Concept Rehabilitation Plan that includes the sewer infrastructure and sewer easements and clearly outlines replacement planting constraints, removal protocols, and ongoing maintenance requirements.

Stormwater

- 7) The stormwater strategy is supported with detention and water quality however, the below outstanding issues need to be addressed:
 - a. Provide a swale along the eastern boundary of TH13 to manage major/blockage flows and ensure the TH13 floor level is at least 200mm above the top of that swale;
 - b. Ensure TH13 is at least 150mm higher than the road where detention tank is proposed to ensure major flows or blockages will spill along the eastern boundary. Its FFL should be slightly higher at 35.4m AHD; and
 - c. Detention tank requires a sag in driveway to capture major flows. Ensure lot levels are at least 150mm above the tank inlet pits.

Waterway corridor

- 8) The flood study must include the proposed filling associated with the proposed development at No 32 Redhead Street. This is to ensure cumulative impacts of filling addressed where filling within flooded parts of the waterway corridor overlay in accordance with PO7 of the Waterway corridor overlay code. Ensure flood impacts on others land is limited to <10mm.

Flooding

- 9) Submit an amended Flood study which includes the following to demonstrate compliance with PO5 and PO7 of the Flood overlay code:
 - a. A flood scenario is required for setting the flood planning levels for the development, requiring a Maning's value in the waterway of 0.15 as per the Flood PSP requirements;
 - b. The flood study must include the proposed filling associated with the proposed development at No. 32 Redhead Street. This is to ensure the flood immunity of developments is appropriate and ensure no flood impacts to levels or flood hazard;
 - c. Provide a table of minimum flood planning levels required for all units. The current plans show townhouse levels on the southern side of the development being too low;
 - d. It is recommended to lower the communal open space area so that it floods to <300mm depth in a 2% AEP event in order to minimise flood impacts. Otherwise ensure no adverse flood impacts;

- e. Provide an easement for overland flow flooding purposes over the areas affected by the 2% AEP flood extents to protect & maintain the filling strategy. Show this easement clearly on plan of development or separate easement plan.

Refuse

- 10) A review of the architectural drawings has identified that the Stage 2 “Roofed Bins Enclosure” does not provide adequate storage capacity or facilitate appropriate source separation. The current design is insufficient to accommodate the required waste allocation for each townhouse, being 240L of general refuse and 240L of commingle recycling per week. It is noted that the stage 1 refuse solution is adequate in size, subject to the refuse storage area and its dimensions being clearly denoted on the architectural plans. It is noted that Stage 2 - TH 1, 2, 5 & 6 have not been provided internal access to dispose of waste streams. It is not acceptable to enter the public realm to dispose of waste streams.

In accordance with PO2/ AO2, PO32/ AO32 of the Multiple dwelling code and PO8/AO8.1 & AO8.2 of the Infrastructure design code, provided amended architectural plans addressing the following:

- a. Clearly demonstrate that stage 2 has been provided with a “Roofed Bins Enclosure” (roofed & wholly screened) which has a minimum area of 19.54m² (internal dimensions of 5.34m W x 3.66m D) to house six (6) x 1,100L bulk bins (i.e., three (3) x 1,100L bulk bins for general refuse + three (3) x 1,100L bulk bins for commingle recycling each week;
 - b. Demonstrate that stage 2- TH 1, 2, 5 & 6 have been provided with internal access to dispose of waste streams; and
 - c. Denote the area (m²) and internal dimensions of the stage 1 and stage 2 “Roofed Bins Enclosures”.
- 11) In order to address PO1/ AO1, PO19/ AO19.2 & AO19.3 of the Transport, access, parking and servicing code and PO8/ AO8.1 & AO8.2 of the Infrastructure design code, provide amended architectural plans clearly demonstrating the Stage 2 RCV standing and loading area gradient does not exceed 1:20

Sewer

- 12) Submit a Service Advice Notice from Urban Utilities.

Streetscape works

- 13) Redhead Street and Giant Street are identified as a Neighbourhood Street Minor streetscape type under the Streetscape hierarchy overlay code which requires the provision of a 1.2m wide footpath and regrading of both verges to achieve a 1 in 50 crossfall. As part of any approval, works will be conditioned to the Redhead Street and Giant Street verges in accordance with this streetscape type and Infrastructure design planning scheme policy to support a high quality subtropical streetscape with a strong pedestrian amenity focus in accordance with PO2 of the Streetscape hierarchy overlay code.
 - a. Provide amended plans which indicates the following:
 - i. A 1.2m wide footpath along the full length of the Redhead Street and Giant Street verge on an alignment that is a minimum 1.3m from the back of kerb;
 - ii. Grading of the verge of Redhead Street and Giant Street to achieve a 1 in 50 crossfall falling towards the street.

Communal open space

- 14) The proposal indicates areas of communal open space that lack any recreational function, contain significant stormwater infrastructure, are potentially impacted by flooding and shared with deep planting. The proposal is to ensure communal open space offers a range of recreational opportunities in a safe and accessible space for all residents in accordance with PO30 of the Multiple dwelling code.
- a. Provide amended plans including a Landscape Concept Plan prepared by a suitably qualified Landscape Architect that demonstrates:
 - iii. The provision of a communal open space area for each stage that offers a range of passive and active recreational opportunities;
 - iv. The communal space is to be safe and accessible to all residents and be outside of any overland flow or flooding impacts;
 - v. Demonstrate through detailed drawings the levels of embellishments, proposed landscaping, indicative levels and pedestrian access; and
 - vi. Demonstrate opportunities to retain existing vegetation within communal open space areas or provides offset planting.

Landscape design

- 15) A landscape concept plan has not been provided; this is required to demonstrate how landscape outcomes on site will be delivered to demonstrate compliance with City Plan. Provide a landscape concept plan for each stage to demonstrate how landscape outcomes required in the Multiple dwelling code and Landscape works code are being achieved. The plan is required to be prepared by a suitably qualified landscape architect and address the following;
- a. Large subtropical shade trees species capable of growing to a minimum canopy diameter of 5m and a minimum height of 5m within 5 years of planting as well as casting shade over the adjacent verge within the deep planting areas in accordance with PO28 and PO29 of the Multiple Dwelling Code;
 - b. The provision of landscape buffers along the boundaries of the site that support the provision of columnar screening trees and shrubs that effectively soften the extent of built form, hardstand and retaining structures from adjoining properties in accordance with PO28 of the Multiple dwelling code, PO3 and PO11 of the Landscape work code;
 - c. The provision of small feature trees and landscape strip to the frontage within each street facing courtyard in accordance with PO28 and PO29 of the Multiple dwelling code;
 - d. The inclusion of sections and elevations that demonstrate how landscaping will be utilised to provide a positive interface with the streetscape and adjoining properties;
 - e. The inclusion of detailed drawings to demonstrate how private and communal open space areas will support a high level of amenity in accordance with PO28, PO30 and PO31 of the Multiple dwelling code;
 - f. A planting palette that details the selected plant species including planting densities and stock sizes in accordance with PO7 And PO8 of the Landscape Works Code; and
 - g. Detail how the proposal will achieve water sensitive design measures as outlined in PO12 of the Landscape Works Code.

Land use & yield

- 16) It is acknowledged that Multiple dwellings are contemplated to an extent in the DN plan, however further information is required to demonstrate how the land use aligns with the intent of the zone and Strategic framework as assessment benchmarks.
- a. Submit further material demonstrating how the proposed Multiple dwelling meets locational requirements to support the land use and proposed uplift in the zone and under the CP2014 Strategic framework.
- 17) The development proposes a yield of 44 dwellings per hectare comprising entirely of Multiple dwellings. While some density uplift can be contemplated overall outcome (3)(f)(i) of the DN plan specifies a mix of Dwelling houses and Multiple dwelling are anticipated in the locality at a yield of 16 dwellings per hectare. Further information is required to demonstrate the proposal is at a suitable scale for the locality and appropriately responds to site constraints and opportunities.
- a. Submit information to demonstrate the proposal is at an appropriate yield upon addressing the remainder of the issues identified herein. It is recommended an analysis of existing, approved and proposed developments in the locality is submitted to assist in demonstrating the development is at an appropriate density and contribute to a sustainable and functional community.

Building envelope

The development proposes a building height under 9.5m above ground level which aligns with the intent of CP2014. The proposed setbacks, building separation and site cover are of concern however, with the development appearing to seek multiple performance outcomes when considered in each stage.

Front setbacks

- 18) Provide an increased ground floor and first floor front setbacks to Giant Street for townhouse one (1) in accordance with PO6 of the Multiple dwelling code, noting within the same streetscape context on the northern side of Panda Street a 5m setback to garage and 7.3m to wall is provided at 20 Panda St.
- 19) Provide amended first floor plans with dimensioned setbacks including from the waterway corridor consistent with PO3 of the Multiple dwelling code.

Rear setbacks

- 20) The development proposes an ultimate 0m rear boundary setback to the waterway corridor in stage 1. Submit amended plans showing increased ground floor and first floor rear boundary setback to the waterway corridor in stage 1.

Side setbacks

- 21) It is currently unclear the extent of performance outcome sought for side boundary setbacks above 1 storey and 4.5m height in stage 2. Submit further details, including dimensioned plans, clearly indicating where performance outcomes for side setbacks are sought, specifically setbacks less than 2.0m up to 7.5m building height and 2.0m plus 0.5m/3m above 7.5m building height as per table 9.3.14.3.C of the Multiple dwelling code.
- 22) Built to boundary walls are proposed on the eastern side boundary of stage 2. It is noted that built to boundary walls are not contemplated in the EC zone under PO7 of the Multiple dwelling code, with the EC zone not being a residential zone and there being no adjoining built to boundary walls. Accordingly, increased side boundary setbacks are required at this interface. Submit amended plans showing increased side boundary setbacks on the stage 2 eastern side boundary in accordance with PO7 of the Multiple dwelling code.
- 23) Submit amended plans showing dimensioned ground floor and first floor stage 2 side boundary setbacks to the waterway corridor including additional justification against PO7

of the Multiple dwelling code where reduced side boundary setbacks at this interface are proposed on ground level and above.

Building separation

- 24) The development appears to seek a performance outcome for reduced internal building separation with approximately 6.5m between first floor habitable spaces of townhouses 4 and 11 in stage 1 and between townhouses 10 and 14 in stage 2. Further information is also required to understand building separation to the adjoining external properties.
- a. Submit a site context plan a site context plan that includes adjoining and adjacent buildings (including habitable rooms) internally and externally to the development and strategies to address separation issues such as screening.

Site cover

- 25) Confirm the revised site cover for each stage and the whole development in light of the above-requested changes, noting site cover is defined in Schedule 1 of the CP2014 as *'...portion of the site, expressed as a percentage, that will be covered by a building or structure, measured to its outermost projection, after the development is carried out, other than a building or structure, or part of a building or structure, that is—*
- a. *in a landscaped or open space area, including, for example, a gazebo or shade structure; or*
 - b. *a basement that is completely below ground level and used for car parking; or*
 - c. *the eaves of a building; or*
 - d. *a sun shade."*

Design

- 26) The proposal presents a relatively two-dimensional facade to the streetscape, with long horizontal elevations. There is opportunity to provide further breaks and modulation in built form and incorporate lightweight elements to reduce the appearance of the built form and reflect the subtropical character of the area as per PO9 and PO26 of the Multiple dwelling code.
- a. Submit amended plans incorporating the following design elements:
 - i. balconies, verandas or terraces on each level, including the upper storeys. Privacy screening on balconies and balustrades should be considered in the design;
 - ii. variation in the treatment and patterning of windows to bring visual interest and activation to each facade;
 - iii. variation in building form, materials, colours, textures and finishes to articulate finer scale architectural features and building elements such as party walls and slab edges;
 - iv. recessions and projections in the roof and wall plane, such as steps, slopes or splays which cast shadows;
 - v. modulation and substantial articulation to break up long elevations; and
 - vi. provide direct pedestrian access from Giant St to stage 1 townhouses 8, 9, and 10 as per PO12 of the Multiple dwelling code.

Urban Utilities (UU)

Council does not undertake water and sewer assessment of any planning applications. Contact UU on (07) 3432 2200 to discuss any water and sewer issues and whether you are required to submit an application to UU for assessment.

Responding to this request

Your response should include a summary table which outlines any changes to performance outcomes and plans that have resulted from addressing the issues outlined above. The table should also include details of any supporting documentation.

If a response is not provided within the prescribed response period of three (3) months assessment of the application will continue from the day after the day on which the response period would have otherwise ended.

Email your response to DSPlanningSupport@brisbane.qld.gov.au quoting the application reference number A006866747.

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

Yours sincerely



Joanna Smeed on behalf of Joel Wake
Senior Urban Planner
Planning Services South
Phone: (07) 3178 7467
Email: joel.wake@brisbane.qld.gov.au
Development Services
Brisbane City Council