

Our ref: STP4370
Contact: Alex Steffan | alex@steffanharries.au
Website: www.steffanharries.au
Phone: 07 3317 0042



Thursday, 13 August 2026

Chief Executive Officer
Brisbane City Council
GPO Box 1434,
Brisbane QLD 4001

Attention: Joel Wake
Via email: joel.wake@brisbane.qld.gov.au

RE: RESPONSE TO FURTHER ADVICE NOTICE

Reconfiguration of Lot (1 into 13 lots) on a Community Titles Scheme + Access easement
COUNCIL REF: [A006711283](#)
32 Redhead Street, Doolandella QLD 4077
Lot 71 on RP90234

Dear Joel,

I refer to the Further Issues notice received from Brisbane City Council dated 23 March 2026 in relation to the development application lodged a Reconfiguration of Lot (1 into 13 lots) on a Community Titles Scheme + Access easement at 32 Redhead Street, Doolandella. On behalf of the applicant, Steffan Harries provides the following response in addition to the following attachments:

- **Appendix A** – Ecologist response to Further advice
- **Appendix B** – Updated vegetation retention plan
- **Appendix C** – Updated servicing plan
- **Appendix D** – Updated stormwater management plan

Matter Raised:

Ecological Values

1. The revised civil design show stormwater infrastructure that encroaches further into the mapped waterway corridor than previously proposed. This further encroachment into the waterway corridor is not supported. The extent of infrastructure and earthworks previously shown in the Servicing Layout Plan (Drawing No. 5397-SK01) and the Earthworks Layout Plan (Drawing No. 5397-SK02) can be considered subject to providing an amended Vegetation Retention Plan which includes the following;

- (a) The proposed civil design plans (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) and associated structures required during construction of the development.
- (b) If works encroach into the TPZs of any trees identified to be retained, a report from a qualified arborist (minimum AQF level 5 Arboriculture) is required to demonstrate no negative impacts on the long-term health of the trees.

Response:

Please refer to **Appendix A-B** (amended Vegetation Retention Plan, Drawing Nos. S524136_VRP_001 to 003, Issue C, 5 August 2026, S5 Environmental) for a response to this matter raised.

The amended plan overlays the proposed civil design plans, including all services and infrastructure on site and external to the site (road frontage), and clearly shows the full extent of the proposed earthworks (cut and fill) and associated structures required during construction, in accordance with item (a) of the notice.

Tree retention and removal has been amended to reflect this earthworks extent. Three trees on the neighbouring lot to the east (trees 36, 42 and 43) have been identified as 'retain subject to arborist approval' due to the incursion of the proposed earthworks into their tree protection zones. An Arboricultural Impact Assessment by a suitably qualified arborist (minimum AQF level 5) is currently being undertaken by Independent Arboricultural Services to determine the retention or removal of these three trees, in accordance with item (b) of the notice. Should the assessment recommend removal, written consent from the affected neighbouring landowner will be obtained before any tree is removed.

We request that Council condition the provision of the completed Arboricultural Impact Assessment, and any consequential amendment to the Vegetation Retention Plan, prior to the plan of subdivision being submitted for sealing.

Matter Raised:

Bushfire

- 2. The Information Request response refers to Figure 22 of the Bushfire Management Plan to identify required setbacks from hazardous vegetation for Lots 8–13. However, the BAL setback shown in the figure to achieve BAL-29 for Lots 12 and 13 does not consider the proposed rehabilitation of the Environmental Protection Zone, which will adjoin the southern boundary of Lot 13. As a result, the figure does not accurately represent the required 15.4m setback from hazardous vegetation to the south for Lots 12 and 13.
- (a) Provide an amended subdivision plan that clearly identifies the required bushfire management areas/covenants for the development. A figure is not appropriate for this purpose. Page 1 of 2

Response:

Please refer to **Appendix A** (amended Bushfire Hazard Assessment and Management Plan, Reference S524136_BHAMP_v1.2, 3 August 2026, S5 Environmental) for a response to this matter raised.

The amended BHAMP has re-modelled the setbacks off the proposed retained and rehabilitated vegetation to the south, rather than the pre-rehabilitation extent shown in Figure 22 of the earlier version. Figures 16 and 17 of the amended BHAMP show the Bushfire Attack Level (BAL) setbacks over the proposed development, confirming that all bushfire level exposure areas for Lots 8 to 13 are sited so that a maximum of BAL-29 is achieved, and cannot cross into the BAL-40 contour. This is consistent with acceptable outcome AO1.2 of the Bushfire overlay code, which requires development, where not in compliance with an approved bushfire management plan or development footprint, to achieve a bushfire attack level 'less than or equal to:

- i. BAL-29; or
- ii. BAL-12.5 if for vulnerable uses, difficult to evacuate uses, assembly uses, essential community infrastructure...'.

The amended modelling shows a 15.2m setback to the BAL-29 contour from the hazardous vegetation to the south.

The Bushfire overlay code recognises that 'any bushfire management zone, asset protection zone or similarly defined area approved as part of a bushfire management plan used for bushfire management purposes is considered to be a bushfire management footprint plan' (Note to AO1.1, Bushfire overlay code). Consistent with our response to Council's original Information Request on this matter, we request that Council condition the registration of the Bushfire Management Zone as a covenant or notation on the plan of subdivision at the time it is prepared for sealing, informed by the setbacks confirmed in the amended BHAMP, rather than requiring the subdivision plan itself to be redrafted as part of this Further Advice response.

Matter Raised:

Engineering

3. Further information is required to demonstrate compliance with provisions of the Transport, access, parking and servicing code, Infrastructure design code and Subdivision code. Provide additional information and amended plans to address the following
 - (a) Typical Redhead Street cross sections showing verge treatments, service allocations, footpath locations, and interface with existing levels.
 - (b) Typical driveway cross sections, including transitions, gradients, and tie-in points to the internal accessway and public road.
 - (c) Fully dimensioned extent of all external works along the Redhead Street frontage of the site, including frontage improvements, driveway works, verge treatments, kerb and gutter, drainage, and any required service adjustments.
 - (d) Provide a driveway designed with a minimum width of 5.50•m to accommodate RCV access, in accordance with the requirements of the Refuse PSP.
 - (e) Amend the T-head turn-around area to comply with BSD-3001, ensuring a minimum 5.5•m carriageway width is achieved to support RCV.

Response:

Please refer to **Appendix C-D** (amended civil engineering plans, Drawing Nos. 5397-SM00 to SM07 and 5397-SK01 to SK04, DRW Consulting Pty Ltd, RPEQ 10697) for a response to this matter raised.

The amended plans provide typical cross sections for the internal driveways (Drawing 5397-SM04, 'Typical 10m Wide Driveway Section'; Drawing 5397-SM05, 'Typical 4.5m Driveway Section'), longitudinal sections for the proposed road and driveway centrelines (Drawing 5397-SK04), and a fully dimensioned layout of the external works along the Redhead Street frontage, including the formalised kerb and channel, gully pits and driveway crossovers (Drawings 5397-SM01 to SM03), addressing items (a) to (c) of the notice.

In respect of items (d) and (e), the main internal driveway serving Lots 6 to 11 is designed at 10m in width, well in excess of the minimum required for refuse collection vehicle (RCV) access.

Matter Raised:

Sewer

4. Updated civil plans appear to indicate the utilisation of sewer infrastructure proposed to be constructed as part of an adjoining development. It is noted that the application for this development is still under assessment

- (a) Provide additional information to demonstrate how the proposal can provide sewer infrastructure to service the development in a timely manner and without unreasonably relying on the completion of development on an adjoining site.

Response:

The reliance on sewer infrastructure proposed as part of an adjoining development is appropriately addressed by a condition of any approval, rather than a reason to withhold approval of this application.

Acceptable outcome AO9.1 of the Infrastructure design code already requires that 'the reticulated water and sewerage distribution system for all services is in place before the first use is commenced', and acceptable outcome AO9.2 requires that 'Development provides the lot with reticulated water supply and sewerage to a standard acceptable to the distributor-retailer.' These acceptable outcomes respond to performance outcome PO9, which requires that 'land used for an urban purpose is serviced adequately with regard to water supply and waste disposal'. Acceptable outcome AO4.1 of the Subdivision code similarly requires development to provide land and works for infrastructure and services 'in compliance with... the Local government infrastructure plan... [and] codes and planning scheme policies that apply to the site'.

These acceptable outcomes, applied as standard conditions of any development approval, will ensure that no lot can be used, and reticulated sewerage must be connected and operational, before first use commences - regardless of whether that infrastructure is ultimately delivered through completion of the adjoining development or an alternative direct servicing solution. We therefore request that Council condition this development such that no lot may be used until reticulated sewerage servicing is connected and operational to each lot, whether by the completion of the adjoining development's sewer infrastructure or an alternative servicing arrangement provided by the applicant. This maintains the position advanced in our response to Council's original Information Request on this matter.

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,



Alexander Steffan | Director

Steffan Harries

Email: alex@steffanharries.au