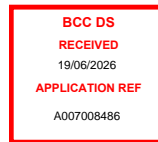


19 June 2026

Attention: Carly Manley
Brisbane City Council
GPO Box 1434
Brisbane QLD 4000



Via email: DSPlanningSupport@brisbane.qld.gov.au

Dear Carly,

**RE: RESPONSE TO INFORMATION REQUEST
SECTION 13.2 OF THE DEVELOPMENT ASSESSMENT RULES
86 KEONA ROAD, MCDOWALL QUEENSLAND 4053**

We act on behalf of River Quarter No. 3 Development Co. Pty Ltd, the Applicant in relation to a Development Application lodged with Brisbane under the *Planning Act 2016* (the Planning Act) over the above land seeking:

- Reconfiguring a Lot – Subdivision (1 Lot into 13 Lots and new private road)

On 20 May 2026 we received an Information Request from Brisbane under Part 3 of the *Development Assessment Rules* (DA Rules). In accordance with Section 13.2 (a) of the DA Rules, we now provide a response to all of the information requested.

In support of our response, we provide the following attachments:

- Attachment A** Amended Engineering Plans
- Attachment B** Amended Stormwater Management Plan
- Attachment C** Bushfire Hazard Assessment
- Attachment D** Updated Proposal and BLE plans
- Attachment E** Traffic Engineering Response

A response to each item of Council's Information Request is included below.

Response to Information Request

Dwelling density

- 1) *In accordance with Overall Outcome 2(d)(i) of the Emerging community zone code, development involving a reconfiguration to accommodate future dwelling houses is to achieve a dwelling density of approximately 18 dwellings per hectare. While it is acknowledged that the proposal achieves an average lot size and dimensions*



consistent with the Subdivision code, and that these provisions are not varied by the McDowall neighbourhood plan code, further information and amendments are required to demonstrate compliance with the intended density outcomes of the Emerging community zone.

- a) Provide further justification demonstrating the walking distance between the subject site and the nearest public transport stop; and
- b) Provide further information and amendments demonstrating that the proposed dwelling density is consistent with the density of comparable subdivisions within the Emerging community zone in the surrounding locality.

Response: The site can service increased density given its proximity to schools, centre zoned land, childcare, healthcare, parks, open space and public transport. Council has specifically requested detail to the nearest public transport stop - The figure below shows there are multiple bus stops on Rode Road and Old Northern Road, and that at least two of these are located within approximately 400m of the site.

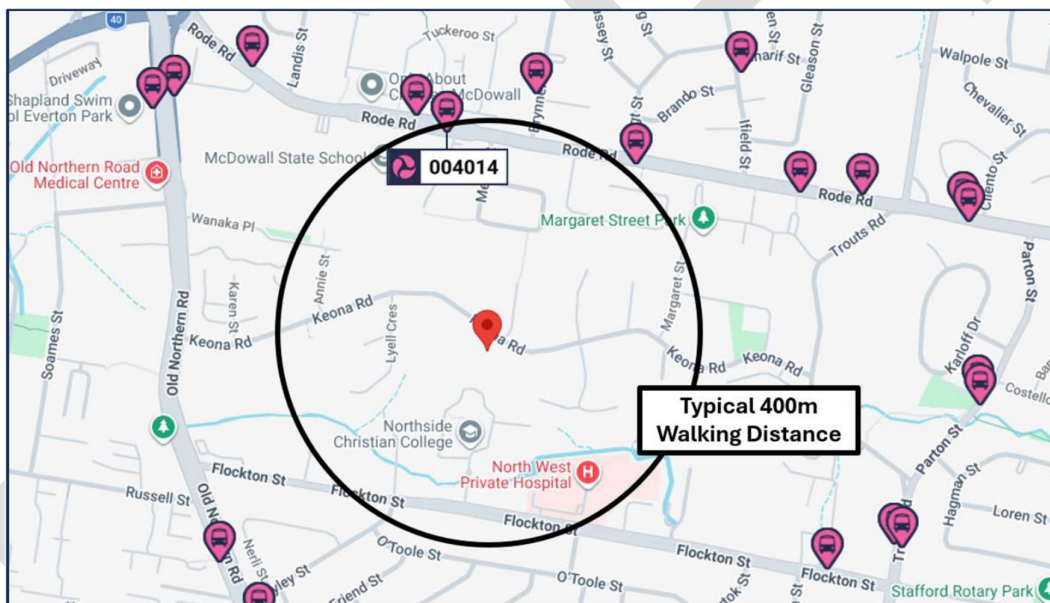


Figure 1 – Public transport stops within proximity of the site

Having regard to the proposed density, an analysis of recent development in the surrounding locality, shown in the table below, demonstrates that densities are typically higher in this neighbourhood compared to other EC / low density residential areas. Multiple dwelling developments have been included in the analysis, as this form of development could also be supported on the site and would achieve a higher density outcome than the proposed subdivision. The proposed development achieves a minimum average lot size of 350m², minimum lot size of 300m² and minimum frontage dimension of 10m and as such, is not considered to represent an overdevelopment of the site.



Council Reference	Address	Description	Density
A006575259	71 Keona Rd McDowall Qld 4053	Reconfiguring a Lot (1 into 13 Community Title Lots; 12 Standard Format Lots and Access Easements)	20.6 dw/ha
A005044406	107 Keona Rd McDowall Qld 4053	Material Change of Use; Reconfigure a Lot	33 dw/ha
A005718737	113 Keona Rd McDowall Qld 4053	Material Change of Use; Reconfigure a Lot	25.5 dw/ha
A005239578	122 Keona Rd McDowall Qld 4053	Material Change of Use; Reconfigure a Lot	26.6 dw/ha
A006760167	61 Landis St McDowall QLD 4053	Reconfigure a Lot	20 dw/ha
A004228846	960 Rode Rd McDowall QLD 4053	Reconfiguring a Lot (2 into 30 Lots) including a new road, and a drainage reserve	29.5 dw/ha
A006300125	105 Keona Rd McDowall QLD 4053	Reconfiguring a Lot (1 into 15 and New Road)	19.5 dw/ha
A006770216	22 Russell St Everton Park QLD 4053	Multiple Dwelling in the Emerging Community Zone (17 units)	46 dw/ha
A001628507	19 Russell St Everton Park QLD 4053	Carry Out Building Work; Material Change of Use (Multi-Unit Dwelling)	33.7 dw/ha
A004329502	112 Old Northern Rd Everton Park QLD 4053	Carry Out Building Work; Material Change of Use; Reconfigure a Lot (Multi-Unit Dwelling; Subdivision of Land)	38.3 dw/ha
A003723995	128 Barton St Everton Park QLD 4053	Carry Out Building Work; Material Change of Use; Reconfigure a Lot	29.9 dw/ha

Existing vegetation

2) *The existing vegetation on-site is identified as Significant Urban Vegetation under the Natural Assets Local Law. Overall outcome 2.b.iii of the Emerging community zone code, Overall outcome 2.b.v and Performance outcome PO1 of the Subdivision code and OO3(b & f) of the McDowall neighbourhood plan code require development to respond appropriately to the landscape character and site-specific conditions.*

A number of the trees provide important habitat values that must be protected and enhanced, while others contribute significantly to the visual amenity of the area. Accordingly, the complete removal of all vegetation is not supported.

Earthworks and retaining structures must be designed and located outside the Nominal Root Zones (NRZ), also referred to as Tree Protection Zones, to avoid adverse impacts on retained trees.



- a) *Submit amended plans, demonstrating:*
 - i) *Retention of trees along site boundaries in accordance with AS4970 'Protection of trees on development sites'.*
 - ii) *Lot layout and lot sizes to accommodate building envelopes as well as NRZ of retained trees.*
 - iii) *All earthworks excluded from NRZ; and*
- b) *Submit an earthworks plan, demonstrating no fill, cut or services are located within an NRZ.*
- c) *Submit an arborist report, prepared by an AQF Level 5 qualified arborist, outlining protection measures where earthworks are proposed to more than 10% of an NRZ.*

Response: Given the steep fall of the land from Keona Road to the rear property boundary, a combination of cut, fill and retaining walls are required across the majority of the site to achieve the required engineering outcomes and flat, easy to build on lots which the market demands for the dwelling typology. As a result, the retention of vegetation on this site is very difficult.

A major consideration in the required earthworks is the internal road which is cut to a maximum grade of 16.7% in order to take up the grade quickly to reduce the height of retaining at the southern boundary, which interfaces with the school. The ability for the road to take up grade is complicated by the requirement of the Refuse Planning Scheme Policy which limits the grade of refuse collection maneuvering areas (the t-head) to a maximum of 5%, requiring the lower end of the site to be lifted (filled). These works relative to the existing topography are illustrated in **Figure 2** below.

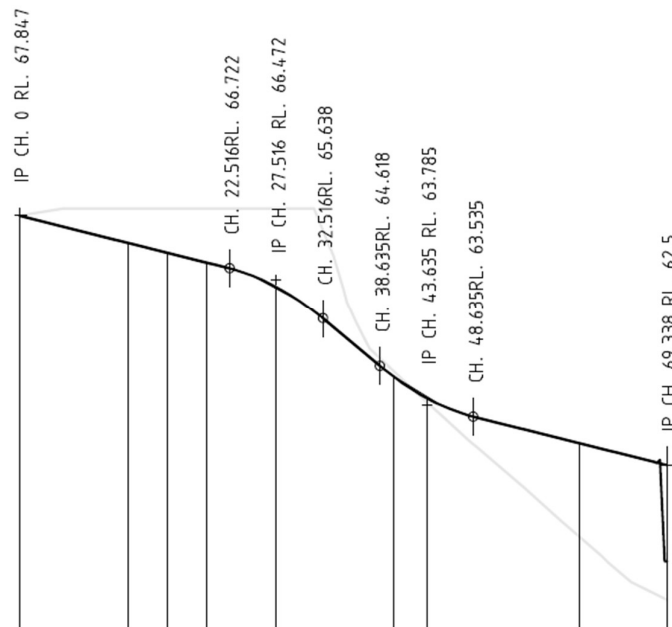


Figure 2 – New road centreline longitudinal section

The earthworks levels for individual lots are largely fixed based on access requirements from the central road.

On the eastern side of the road, Lots 1-3 are largely required to be in fill while Lot 4 is cut, however there is no vegetation here due to the existing tennis court. Given the steep drop off in the southern part of the site, Lots 5 and 6 are also required to be filled to align with the internal road and facilitate servicing and drainage. Accordingly, vegetation retention is very difficult in this part of the site.

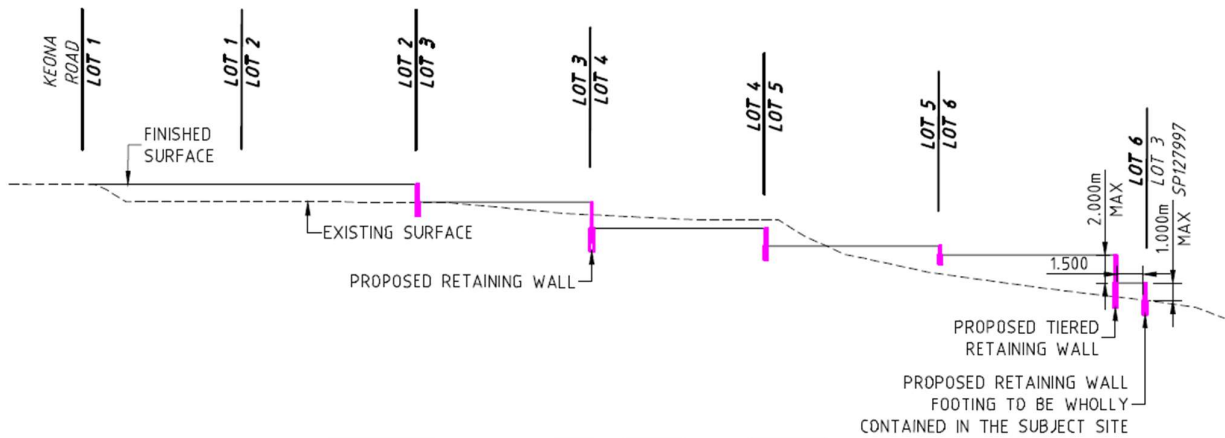


Figure 3 – Section D of Civil Engineering plans showing stepped retaining

On the western side of the road, lots in the northern part of the site are generally proposed in cut in order to lengthen the road's descent to assist with grade constraints. In the south-western part of the site (Lots 7 and 8), where the land falls steepest, individual lots are required to be cut at the high side and filled and retained at the low side to achieve flat building pads in line with market expectations. This is illustrated in Figure 4 below:

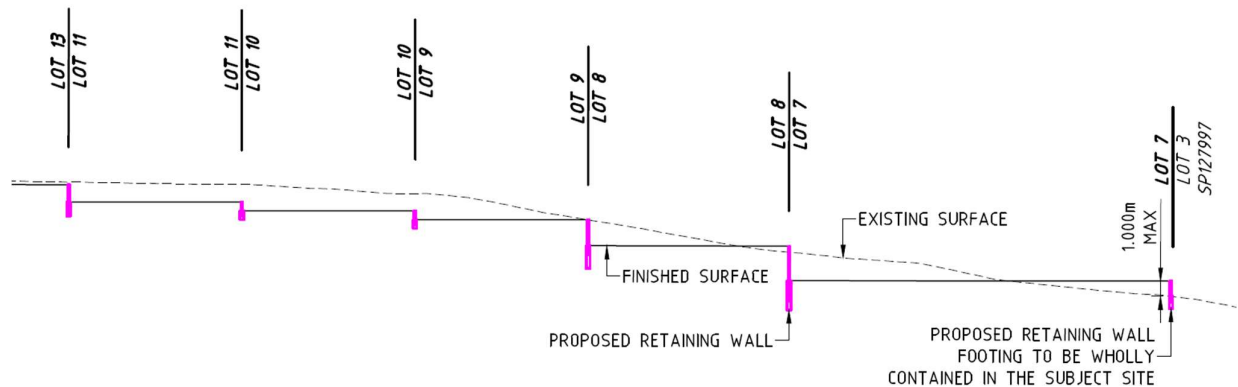


Figure 4 – Section C of Civil Engineering plans showing stepped retaining



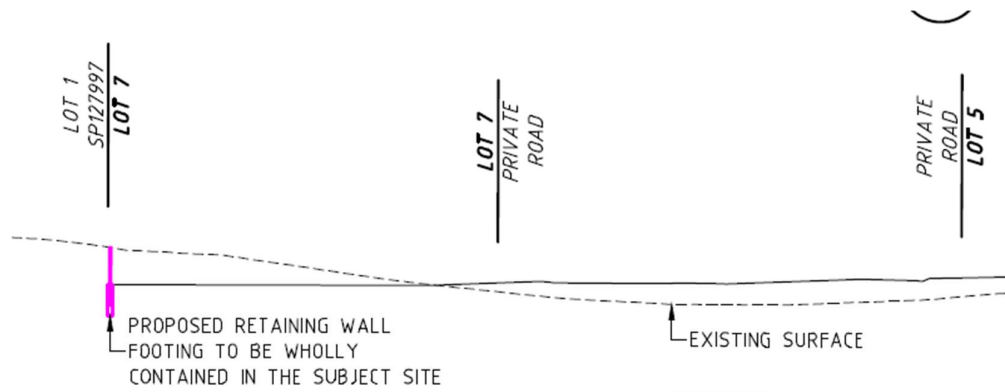


Figure 5 – Section B of Civil Engineering plans showing cut through HES mapping

These earthworks make the retention of vegetation, particularly in the HES, largely untenable.

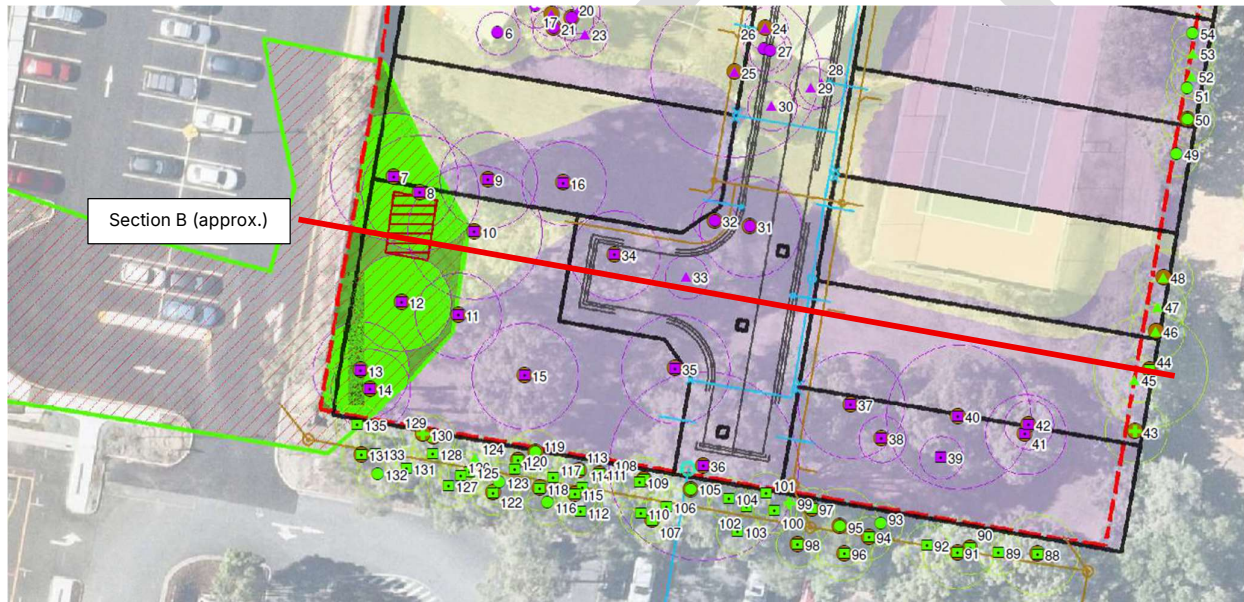


Figure 6 – Extract of Tree Retention and Removal Plan

Notwithstanding the above, retaining a small number of disconnected trees at the south western corner would have limited ecological value insofar as the vegetation will be adjoined by urban development to the north and a school car park on its west and south. Importantly, the school has approval to remove the vegetation immediately south of the site for a multi-storey car park. As a result, any remaining will be isolated in a highly modified environment and disconnected from adjoining environmental areas.

In terms of landscape value, none of the trees qualify as significant landscape trees under the Significant Landscape Tree Overlay Code.



Having tabled all relevant considerations relating to engineering constraints, market demand for flat useable building pads, lack of ecological value found and the immediate need for dwelling supply and more affordable housing, there has been no chance to the engineering design or tree retention status.

Bushfire

3) *The site is mapped within a Bushfire Hazard Area in the State's Natural Hazards, Risk and Resilience mapping.*

a) *Provide a site-specific bushfire hazard assessment in accordance with the Bushfire planning scheme policy or other approved methodology. Where within a bushfire prone area, provide a radiant heat exposure assessment to demonstrate compliance with PO1 of the Bushfire overlay code. Bushfire Reporting and hazard assessment guidelines are available within the technical assessment guide for Bushfire reporting available on Council's website.*

Note: If the bushfire hazard assessment determines a hazard score of 'low', no further assessment against the code is required. If a hazard score of 'medium' or 'high' is determined, an assessment against relevant sections of the code and a Bushfire Management Plan are required.

b) *Provide an assessment against the relevant sections of the Bushfire overlay code, based on the findings of the Bushfire reporting.*

Response: A site-specific bushfire hazard assessment has been prepared by Land and Environment Consultants and is provided at **Attachment C**. The assessment concludes that the site is not affected by bushfire hazard. Therefore, further assessment of the proposed development against the Bushfire overlay code is not required.

Access

4) *Whilst the CTS accessway and direct access from Keona Road to Lots 12 and 13 are generally supportable, the proposal increases both the number and frequency of conflict points and reduces available on-street parking due to the multiple access points to Keona Road. In accordance with PO3/AO3.2 and AO3.3 of the Subdivision code, it is recommended that access to Lots 12 and 13 be consolidated to minimise crossovers and conflict points, and to retain greater kerbside space for waste collection and on-street parking.*

a) *Provide amended plans and supporting documentation demonstrating the consolidation of access for proposed Lots 12 and 13.*



Response: L+R have provided a Traffic Engineering Response at **Attachment E**. The response confirms that Keona Road functions as a neighbourhood road supporting direct lot access, and the proposed access to Lots 12 and 13 is consistent with the existing pattern along Keona Road. Compliant sight distances are achieved and traffic generation is low, such that the additional access points do not result in a significant increase in conflict or impact on road safety or operation. Accordingly, the proposed access arrangement complies with PO3 and consolidation of access is not warranted. On the basis that there is no impact to safety or loss of efficiency, and that separate access to lots 12 and 13 represents an improved outcome for the development, the proposed driveways remain unchanged.

Pedestrian footpath

- 5) *In accordance with PO3/AO3.1 of the Subdivision code and PO1/AO1 of the Infrastructure design code, a non-trunk concrete footpath is to be constructed along the full extent of the site frontage to Keona Road.*
- a) *Provide amended plans which include a concrete footpath along the Keona Road frontage of the site.*

Response: Although a neighborhood road is only required to provide a footpath on one side, and there is already a footpath on the northern side, the applicant agrees to provide a 1.2m wide concrete footpath along the Keona Road frontage of the site. Refer to the amended engineering drawings at **Attachment A**.

- 6) *The proposed CTS accessway generally complies with Table C of the Subdivision code, providing a 6.5m wide carriage way and verges greater than 1.5m width within a 10m wide accessway reserve. However, a 1.5m wide concrete footpath is required to be constructed to one side of the CTS accessway in accordance with PO36/AO36.1 of the Subdivision code Table 9.4.10.3.C—Design of access ways in community title development.*
- a) *Provide amend proposed plans to incorporate the 1.5m concrete footpath.*

Response: Fundamentally, there is not enough space in a 10m reserve for a 6.5m carriageway and a 1.5m footpath. In the applicant's experience, it results in small strips of grass either side of the footpath that create ongoing maintenance issues and clashes with electrical pillars. The applicant has designed multiple CTS estates without a footpath (including 71 Keona Rd and 846 Beams Road, details below) and is of the view that it results in a superior visual, useability and maintenance outcome without any introducing any pedestrian safety concerns.

Given the small scale of the development, extremely low traffic volumes and low posted speed (20km/h), it is unlikely that there will be any conflicts with pedestrians and vehicles. As such, a shared carriageway arrangement is proposed, with pavement differentiation at the entry to delineate a changed traffic environment. Accordingly, while the proposal does not



provide a footpath in accordance with the acceptable outcome, it achieves the intent of PO36 by delivering a safe, functional and high-amenity pedestrian environment that is appropriate to the role and context of the internal CTS road.

In addition, a review of the State Government's Planning Regulation 2017 – "Walkable Neighbourhoods" provisions and the Land Act 1994, indicates that these requirements are only triggered where the reconfiguration includes the construction or extension of a "road". Under the Land Act, Section 93 outlines the meaning of road and states that a road means an area of land, whether surveyed or unsurveyed, for the purpose of a road for public use. The proposed road is not for public use and as such the Walkable Neighbourhood footpath requirements are not applicable. Notwithstanding, a footpath is proposed along the site's frontage.

We note that Council has previously accepted a 6.5m pavement with no footpath for CTS private roads in many recent developments including:

- 159 Ridley Rd, Bridgeman Downs (A006301420);
- 74 Redhead Street, Doolandella (A006305517);
- 150 Lovat Street, Ellen Grove (A005503509)
- 35 Roxwell Street, Ellen Grove (A005718505);
- 89 Cloverdale Road, Doolandella (A005256667 – approved with a 9.5m wide private road);
- 846 Beams Road (A006604001); and
- 71 Keona Road, McDowall (A006575259).

Refuse collection

7) Kerbside collection of the mobile garbage bins (MGBs) presented at the Keona Road kerbside at the frontages of Lots 12 & 13 is supported in principle. The internal swept path diagrams demonstrate that a side loading RCV is able to turn around within the site of the private road. However, the left of the RCV (with the lifting arm) is never presented to the frontage of Lot 7, therefore, the 2 x MGBs for Lot 7 will need to be presented on the frontage of Lots 6 or 8 (preferred) in accordance with PO8 of the Infrastructure design code.

a) Provide amended plans to show the bin presentation/ collection point for Lot 7.

Response: Bins for Lot 7 and 8 will be collected from the frontage of Lot 8 – refer to the updated Proposal Plans (**Attachment D**). This location has been selected as it ensures the left-hand side of the RCV is appropriately aligned with the MGB's at the time of collection whilst being on the straight section of the internal private road and ensures sufficient space is available for the future crossover provision for Lot 8. A Swept Path Assessment has been



provided, demonstrating that a refuse collection vehicle can manoeuvre to collect both sets of bins. Refer to Traffic Engineering Response at **Attachment E**.

8) *The proposed 1m to 2m high terraced retaining wall along the southern rear boundary represent a safety concern that needs to be addressed via a safety crash barrier and / or bollards, located at the end of the CTS road to negate any potential vehicle roll off.*

a) *Provide amended plans which include reference to a safety crash barrier and / or bollards at the end of the CTS road.*

Response: Refer to the amended engineering drawings at Attachment A, which shows proposed bollards at the end of the CTS road.

Summary

We offer this as a response to all of the information requested in Council's Information Request. As required by Section 14.1 (a) of the DA Rules, we advise that Council is to proceed with its assessment of the application.

In fulfilment of our obligations under Part 4 of the DA Rules, we will now arrange for public notification to be carried out for a period of 15 business days.

Should any clarification be required, please contact me on (07) 3251 9439 or email at rileyburke@saundershavill.com.

Yours sincerely,
Saunders Havill



Riley Burke
Town Planner

