

21 August 2026

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

Via Email: dalodgement@brisbane.qld.gov.au

Council Reference: A006866747
Attention: Joel Wake

Dear Joel,

RE: Response to Information Request – Development Permit for Material Change of Use - Multiple Dwelling (27 Townhouses) at 42 Redhead Street, Doolandella

We write on behalf of our client, Sunstate Civil Construction, in response to Council's 1 June 2026 Information Request regarding development at 42 Redhead Street, Doolandella.

This letter and attachments are a formal response to Council's Information Request. Pursuant to Part 3 Section 13.2 (a) of the Development Assessment Rules, the applicant elects to provide all of the information requested.

To the extent changes made to the proposal plans are not in direct response to the Council's Information Request, these changes are considered to amount to no more than a Minor Change to a development application as outlined in Schedule 2 of the *Planning Act 2016*. In particular:

- The changes do not result in substantially different development;
- The revised proposal continues to require impact assessment;
- No prohibited development is proposed; and
- The revised application would not require referral to extra referral agencies.

This written response is accompanied by:

- Revised Architectural Design Plans prepared by Ian Webb Architect;
- Landscape Concept Plan prepared by Andrew Gold Landscape Architect;
- Revised Civil Engineering Plan and Response prepared by DRW Consulting;
- Traffic Engineering Response Letter prepared by BMC Traffic;

- Revised Bushfire Hazard Assessment, Concept Rehabilitation Plan, Vegetation Retention Plan RFI Response Letter by S5 Environmental;
- Revised Arboricultural Impact Assessment prepared by Independent Arboricultural Services.

This letter sets out the applicant's response to each item. The numbering corresponds to the numbering in Council's 01 June 2026 request.

Planning Assessment

Bushfire

Response

Items 1 – 4 of the Council Information requests have all been addressed by S5 Environmental in the attached Response to Information Request. Also accompanying this request is an amended Bushfire Management Plan which includes an assessment of the relevant provisions of the Bushfire Overlay Code.

Planning Assessment

Ecological Values

Response

A response to Items 5 & 6 has been provided in the accompanying response to Council information request prepared by S5 Environmental.

However, consideration for the EPZ proposed by Council was undertaken and it was determined the protection zone intended was predominantly guided by the retention of additional trees within the waterway corridor. The current proposal has made consideration for this by providing a widened corridor particularly in the western extent of the property adjoining TH#7 to approximately 30m from the identified centre line. This amendment to the proposed corridor has allowed for the retention of T21, T22, T24 and T25. Further to this several design changes have been made which allow for the retention of T81, T56 and T9 within areas of common property.

A revised Arborist Report prepared Independent Arboricultural Services also accompanies this response, suitably addressing Item 6. All trees identified by Council in item 6 are now to be located within the common property of Stage 1 or the dedicated waterway corridor, enabling their ongoing retention. All other relevant items have been suitably addressed. The proposed corridor width continues to tie in neatly with the widths of the approved development to the West (A004072658) and the proposed development to the East (A006711283) and their respective corridors.

The revised waterway corridor and additional tree retention represents a balanced outcome, securing a meaningful ecological corridor, protecting select trees beyond the main corridor and accommodating dwellings at an appropriate density in a well serviced location.

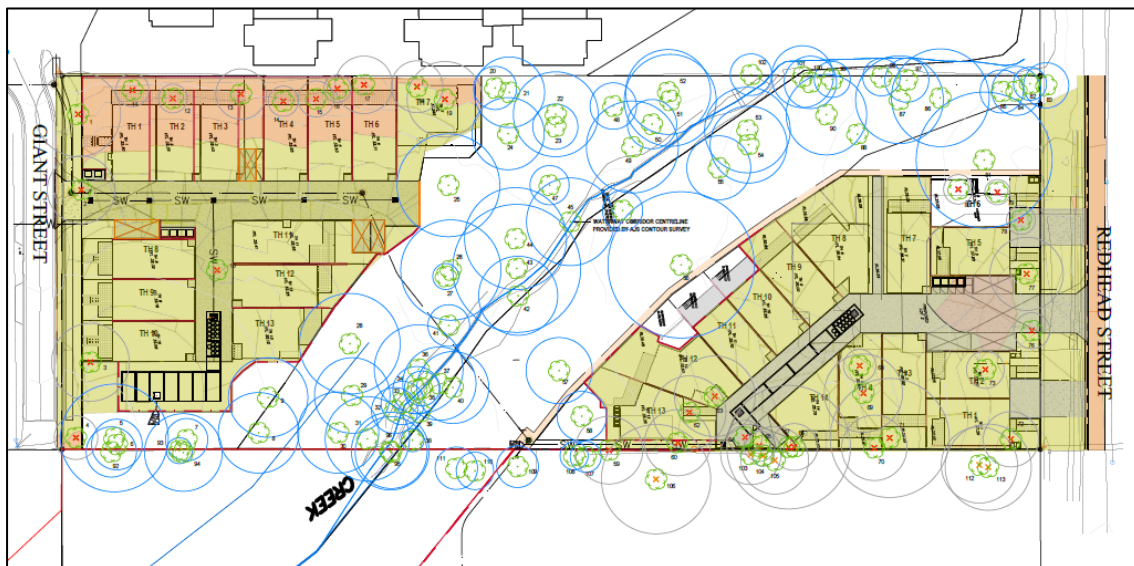


Figure 1: Proposed Vegetation Retention Plan – S5 Environmental (14 August 2026)

Planning Assessment

Stormwater

- 7) The stormwater strategy is supported with detention and water quality however; the below outstanding issues need to be addressed:
- 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;
 - 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
 - Detention tank requires a sag in driveway to capture major flows. Ensure lot levels are at least 150mm above the tank inlet pits.

Response

Updated Civil Concept Plan have been prepared by DRW Consulting and accompany this Development Application. In response to (a) – (c) the following changes in response to Council's request are noted;

- A swale along the eastern boundary adjoining TH13 will provide flows from the northern pad through to the waterway corridor. As demonstrated by Section D on drawing 25303-P1-C, TH#13's finished floor level is to be 35.53m AHD.
- The FFL of TH#13 is above the inlet level of the proposed detention tank.

- A 2% fall from the edge of the crossover towards the centre is proposed.

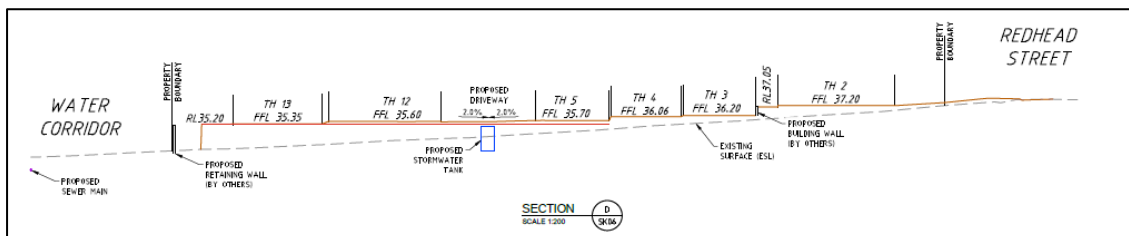


Figure 2: Section D from Preliminary Civil Concepts – DRW Consulting (07 August 2026)

Planning Assessment

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.

Response

A response to Item 8 has been provided in the accompanying civil response prepared by DRW Consulting. Updated modelling shows that a small portion of land at the rear of 32 Redhead Street will be affected by more than 10mm of flood. While in excess of 10mm the impact is on constrained land which is to be dedicated to Council as part of the waterway corridor/balance land as part of A006711283, therefore no actionable nuisance will be created.

Planning Assessment

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.

Response

A response to Item 9 (a) – (e) has been prepared by DRW Consulting Engineers and accompanies this response, see attached.

An easement over flood affected areas can be conditioned where appropriate.

Planning Assessment

Refuse

Response

A response to the respective Refuse items has been provided in the accompanying Traffic Engineering Response prepared by BMC Traffic. As indicated, TH1, TH2, TH5 and TH6 of Stage 2, will be provided with their own 240L refuse bins, which are to be stored within their exclusive use areas and collected at Redhead Street. All other units, in both stages are to make use of the proposed bulk bins. It is determined, on that basis, that sufficient refuse capacity has been provided. This has been detailed to a greater extent in the accompanying response.

Planning Assessment

Sewer

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

Response

The engaged Civil Consultant has lodged a Service Advice Notice with Urban Utilities and is still in progress. The applicant invites a standard “advice note” condition regarding obtaining a water approval.

Planning Assessment

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.

Response

As demonstrated on drawing DA101 of the proposal plans, both the Giant and Redhead Street verges are to be provided with a 1.2m wide footpath along the entire frontage. The pathway in Giant Street is to be setback 1.3m from the back of kerb and the Redhead Street path 2.24m. Both the Giant and Redhead Street verges are to be appropriately graded- see drawing 25303-P1-C prepared by DRW Consulting Engineers.

Planning Assessment

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:
 - i. The provision of a communal open space area for each stage that offers a range of passive and active recreational opportunities;
 - ii. The communal space is to be safe and accessible to all residents and be outside of any overland flow or flooding impacts;
 - iii. Demonstrate through detailed drawings the levels of embellishments, proposed landscaping, indicative levels and pedestrian access; and
 - iv. Demonstrate opportunities to retain existing vegetation within communal open space areas or provides offset planting.

Response

A Landscape Concept Plan accompanies this response, prepared by Andrew Gold Landscape Architect which is determined to achieve (a)(i)-(iv) through in the following ways:

- (i) Both Stage 1 and Stage 2 have been provided with a communal open space area which equates to 5% of their respective developable areas, being 151.2sqm and 155.7sqm respectively. These spaces are consistent with (b) – (h) of Acceptable Outcome AO30.1.

- (ii) Both areas of Communal Open Space are accessible through internal "shared zone" driveways which are free of any impact by flood.
- (iii) Each area of COS has been provided with a suitably sized embellishment, both to be provided a picnic shelter with suitable surrounding grassed areas for general leisure.
- (iv) as demonstrated within the accompanying Vegetation Retention Plan (S5 Environmental) and Arborist Assessment all trees located with the COS or surrounding Deep Planting areas are to be retained.

Planning Assessment

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.

Response

A Landscape Concept Plan prepared by Andrew Gold Landscape Architect accompanies this response to the Council's Information Request and is determined to satisfy Item 15 (a) – (g).

Planning Assessment

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.

Response

The subject land as alluded to in Item 16 is allocated as *Low Density Residential – Dwelling House and Multiple Dwelling* in Figure B – Doolandella South Plan within the Doolandella neighbourhood plan code. Further, the Strategic Framework mapping allocates the land within the Suburban Living Areas. Land Use Strategy L3.2 of Part 3.7.6, Element 5.5 – Suburban Living Areas outlines that small scale Multiple Dwellings are expected in the Emerging Community zone where outlined as being suitable within the relevant neighbourhood plan.

The proposal is also determined to achieve the intent of Strategic Outcome SO3 as the proposal is for a small-scale multiple dwelling which is well located. The site is within 250m (walking distance) of the established neighbourhood centre at the corner of Crossacres Street and Blunder Road with primary tenants being a pharmacist and large format grocery outlet. The Crossacres Street frontage also contains a Council bus-stop (450m from the site) providing for a semi-regular service which facilitates connection to the District Centre at Forest Lake and alternative higher frequency public transport services being Richlands and Oxley Station, and the Forest Lake bus interchange. It makes strategic planning sense to locate additional residential density in proximity to transport and other services.

The proposal also provides for increased supply and diversity of housing options within a locality which is currently transitioning to predominantly detached dwellings on small lots. The proposal is for entirely three-bedroom units which will be suitable for intergenerational living, provides a more affordable option to detached housing, and is well located with essential amenities with a reasonable walking distance of the site.

Planning Assessment

Land use & yield

- 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.

Response

On further review of other established multiple dwelling developments within the direct and wider locality of the site, it is evident that several uplifts in density of a similar nature have been supported by Council. As indicated above, this proposal is intended to achieve a density of 44 Dwellings per hectare once accounting for the waterway corridor dedication. The following sites achieved a comparable density:

- 39 Cloverdale Road, Doolandella – 40 Dwellings per hectare
- 49 Cloverdale Road, Doolandella – 42 Dwellings per hectare
- 73 Redhead Street, Doolandella – 43 Dwellings per hectare
- 36 Philong Street, Doolandella – 43 Dwellings per hectare

The proposal is generally consistent with the expectations of the Emerging Community Zone and Multiple Dwelling Code. As outlined in response to Items 18 – 25 below, several amendments have been made to the proposal to remedy Councils concerns and reduce any impacts on amenity of adjoining landowners. Further, where performance outcomes have been sought, they are able to be appropriately managed or have no material impact on adjoining properties.

Planning Assessment

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.

- 18) & 19) – Front Setbacks
- 20) – Rear Setbacks
- 21), 22) & 23) – Side Setbacks

- 24) – Building Separation
- 25) – Site Cover

Response

Road Boundary Setbacks

In response to Council's request, the proposed road boundary setback to Giant Street is increased to 5000mm (to wall) from TH1 and 5100mm from TH8-10. This setback is consistent with the established streetscape pattern created by the adjoining development to the west on the northern side of Panda Street. See drawing DA105.

Rear Boundary Setbacks

The proposed minimum setback to the waterway corridor is to the ground floor level wall of TH13 where a setback of 950mm is proposed an increase on the previously proposed which features a 0mm setback. While a reduced setback is still being requested, the 'land' which is to be adjoining at the rear is to be allocated for waterway corridor and the direct interface results in no loss of amenity or privacy for any party so is suitable given the context.

Side Boundary Setbacks

In response to item 21, the following performance outcomes for side boundary setback are sought:

- Townhouse #1 –
 - Ground Floor – 500mm
 - First Floor – 2000mm
- Townhouse #14 –
 - Ground Floor – 1000mm
 - First Floor – 2400mm
- Townhouse #13 –
 - First Floor – 2000mm

The proposed performance outcomes at a ground level are both for the respective garages of TH#1 and TH#14 a non-habitable space. As demonstrated on the relevant elevation plans, the garage of TH#1 will include no windows which could result in impact on privacy or amenity of a future adjoining landowner. The increased setback of 500mm (previously built-to-boundary) removes the direct interface between the proposed dwelling unit and the future adjoining lot. As demonstrated in Figure 4 below, the proposed performance outcome for TH#14 is largely due to a projection of the garage at the ground level because of its orientation. The 1000mm setback has no material impact on the adjoining property, especially once accounting for the 1.8m boundary fence.

As detailed above, performance outcomes are sought for TH#1, #14 and #13 for their first-floor side boundary setback. As demonstrated by Elevation 2 on Drawing DA204 of the proposal plans, there is to be minimal windows provided to the upper storey with those provided being to bathrooms. These windows would be likely to be provided with obscured glazing, however, to avoid any doubt we request that Council impose suitable conditions for these windows to be screened appropriately.

As detailed on the revised Architectural Plans, a minimum internal separation of 6500mm (ground floor) and 7830mm (first floor) between TH#11 and TH#4 is proposed. Elevation 2 of Drawing DA203 shows that TH#11 and TH#8 both include only a single first floor window where there is to be no direct view lines between the units. It is requested that Council impose standard screening conditions where reasonable to mitigate impact.

Response to Council Information Request HG.docx – 42 Redhead Street, Doolandella

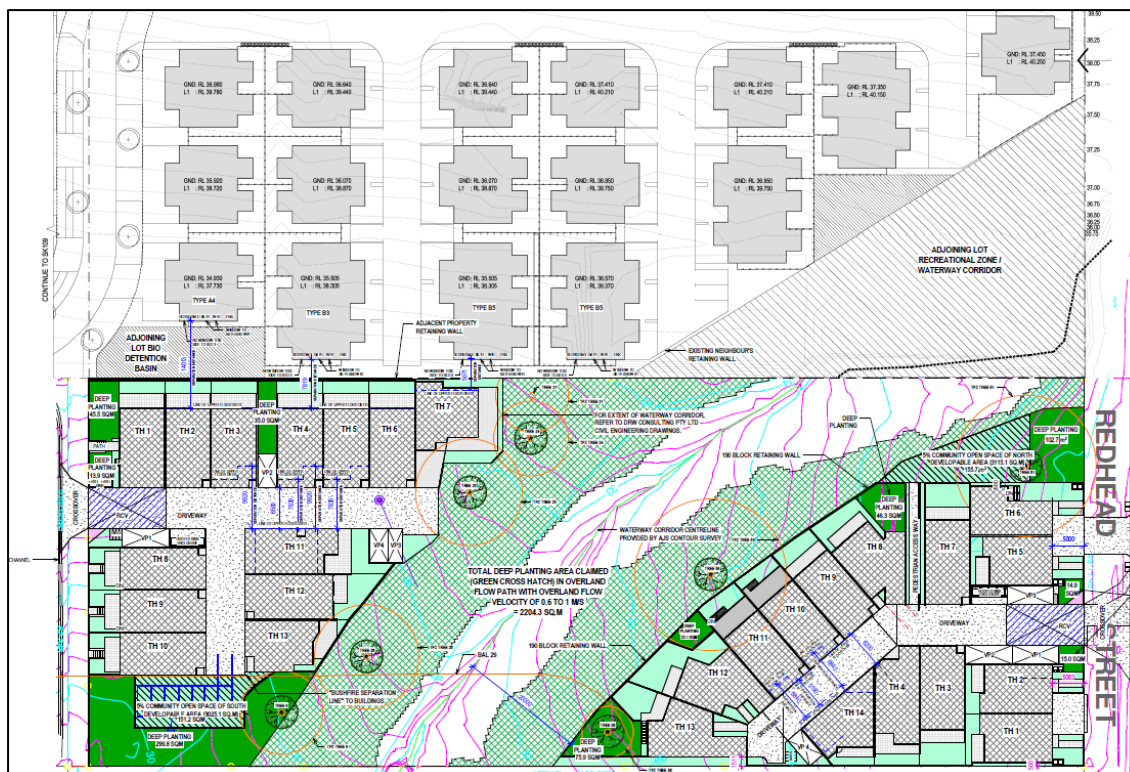


Figure 5: Site Context Plan with Proposed Building Separations – Ian Webb Architect

Site Cover

As demonstrated on drawing DA111 – Site Cover Area Calculation Plan of the proposal plans a site cover of 49.6% is achieved for Stage #1 and 49.3% for Stage #2. On a per site area basis, the total site cover is 30.4%. To the extent a Performance Outcome is required, the proposal achieves an appropriate balance between built form and open space.

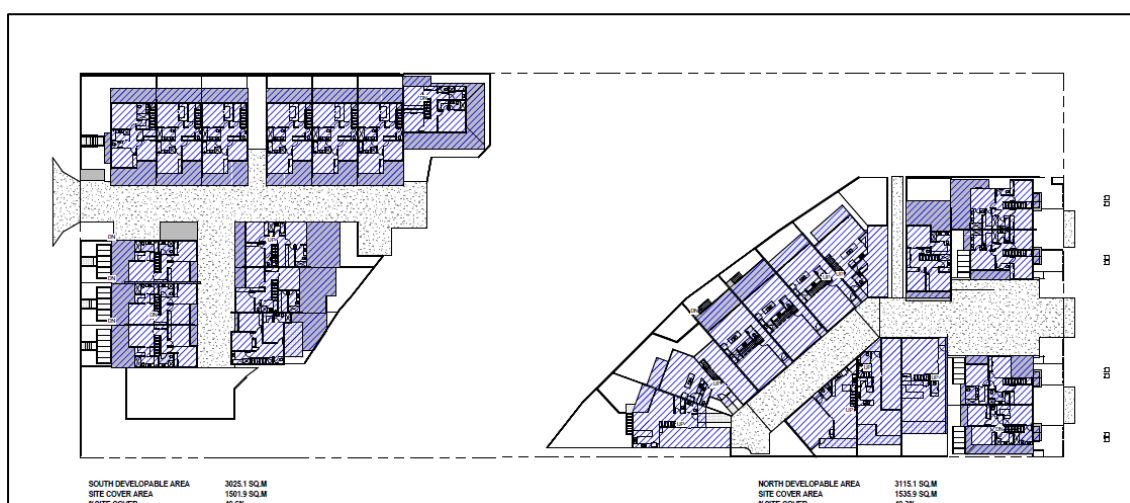


Figure 6: Proposed Site Cover Plan – Ian Webb Architect

Planning Assessment

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.

Response

As demonstrated by Elevation 2 on drawing DA201 and Elevation 1 on DA204 of the proposal plans, the units which are proposed to have direct interface with both Giant and Redhead Street have been amended to include additional articulation elements. This has been provided as below:

- Variation in roof form with the use of opposing skillion forms and open gables porch elements.
- Variation in the use of materials including weatherboard cladding to the upper storey and rendered masonry at the ground floor;
- The proposed external finishes include variation in the direction of weatherboard cladding (both vertical and horizontal), the colours of external treatments;
- Lightweight fencing elements along the road boundary;
- Irregular window patterning to create additional visual interest;
- Recessed building elements to provide shadow casting and modulation in the overall form;
- Slab protrusions which provide for additional modulation and visual interest;



Figure7: 3D View of Stage 1 From Giant Street – Ian Webb Architect (tree planting not shown)



Figure 8: 3D View of Stage 2 From Redhead Street – Ian Webb Architect (tree planting not shown)

We trust the above and accompanying information suitably addresses the comments of the Council however should further clarification or information be required please contact our office.

Public Notification shall now commence in accordance with the procedures outlined in the *Planning Act 2016*.

Yours faithfully

URBAN STRATEGIES PTY LTD



Blair McPherson
SENIOR TOWN PLANNER