

BCC DS
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APPLICATION REF
A006943953

Our ref: STP4828
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Monday, 18 May 2026

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

Attention: Chris Dixon | Brisbane City Council
Via email: Chris.M.Dixon@brisbane.qld.gov.au
Cc: DSPlanningSupport@brisbane.qld.gov.au

RE: RESPONSE TO THE PUBLIC SUBMISSIONS

Multiple Dwelling (34 Units)
Council reference: A006943953
61 Landis Street, McDowall QLD 4053
Lot 31 on RP810085

Dear Chris,

We write to you in regard to the submissions received following the public consultation period for the above-mentioned development application. We provide this response to assist Council in assessing whether the matters raised by the public are relevant to the applicable planning matters of this application.

OVERVIEW OF SUBMISSIONS

Submission Number	Submission Date	Submitter	Submitter Relationship to Site
35766	16/04/2026	Details removed by request	New resident of De Mille Street, McDowall.
52300	19/04/2026	Rachel Meehan	Local McDowall resident.
55348	20/04/2026	Mike Fowler	Resident of 4 Bisset Place, McDowall, located above and directly south of 61 Landis Street.
65700	21/04/2026	Details removed by request	McDowall resident.

67419	21/04/2026	Details removed by request	Local resident.
74577	22/04/2026	Tina Summers	Resident of 94 De Mille Street, McDowall, directly opposite the site.
80856	23/04/2026	Details removed by request	Resident of Ruggles Court, McDowall.
91045	25/04/2026	Details removed by request	Local resident.
91127	25/04/2026	Tess Williams	Resident of Landis Street.
68892	02/04/2026	Details removed by request	Current local resident.
74781	05/04/2026	Christopher Webb	Resident of 67 Hackman Street, McDowall.
32123	15/04/2026	Details removed by request	Resident of 67 Landis Street, McDowall and adjoining neighbour to the subject site.

RESPONSE TO SUBMISSIONS

Submitted feedback	Relevant Submissions	Applicant response
<p>The proposal will add a significant number of vehicle movements to Landis Street, De Mille Street, Sinatra Crescent and surrounding local streets. Submitters state the road network is already narrow, congested and not designed to accommodate additional traffic from 27 townhouses. Concerns include traffic building up behind parked cars, difficulty passing on narrow streets, school peak congestion, and general worsening of traffic conditions.</p>	<p>35766, 52300, 55348, 65700, 67419, 74577, 80856, 91045, 91127, 68892, 74781, 32123</p>	<p>The applicant respectfully disagrees with this submission. The proposal has been independently assessed by Modus Traffic and Transport Engineering (RPEQ certified – Appendix C) and the operational outcomes have been demonstrated as acceptable. The development of 27 dwellings is forecast to generate a peak-hour volume of approximately 17 vehicles per hour, which equates to one additional vehicle movement onto the external network every 3 minutes and 32 seconds (Appendix C, Section 4). This generation rate is not capable of producing a material change to the existing operating conditions on Landis Street, De Mille Street or Sinatra Crescent. Further, Landis Street and the surrounding network are classified as Neighbourhood Roads under the Brisbane City Plan 2014 Road Hierarchy Overlay (refer Town Planning Report, Section 7.1.3), the express function of which is to accommodate property access and local traffic distribution. The carriageway width of Landis Street at the site frontage is 11.0m (Appendix C, Section 4.1.2), which is sufficient to accommodate two-way movement past kerbside parked vehicles. On this basis, the proposed development is considered to operate within the intended capacity of the existing local road network and will not compromise the safety or efficiency of the external road network.</p>

The Landis Street and Rode Road intersection is described as already dangerous, congested and difficult to exit, particularly for right turns during peak periods. Concerns include limited sight distance, a blind spot, queuing from the Rode Road roundabout, school traffic, illegal U-turns, and conflicts with vehicles entering and exiting Landis Street.

52300, 55348, 65700, 67419, 80856, 91045, 91127, 32123

The submitters' concerns regarding the Landis Street and Rode Road intersection have been considered. Modus Traffic and Transport Engineering (**Appendix C**) has assessed the site access arrangements against Australian Standard 2890.1 and the BCC Transport, Access, Parking and Servicing Planning Scheme Policy (TAPS PSP), and confirmed that the site driveway achieves the minimum sight distance of 90m in both directions along Landis Street (**Appendix C**, Section 4.1.4). The intersection of Landis Street and Rode Road is an existing piece of Council-controlled infrastructure that operates within the broader Brisbane road network and will continue to be operated and managed by Council. As demonstrated in the traffic report, the proposed development generates a low order of new traffic (17 vehicles per hour in the peak, equating to one additional vehicle every 3 minutes and 32 seconds), which is below the threshold typically warranting a Guideline for Traffic Impact Assessment (GTIA) or intersection upgrade contribution. The proposal does not materially change the existing operating conditions of the Landis Street/Rode Road intersection.

Submitters raise concern that the Landis Street precinct is serviced by one practical vehicle access point to Rode Road. They argue there is no alternative vehicle connection through De Mille Street or Osmond Street, making the area vulnerable to congestion, access constraints and safety risks.

35766, 74577, 80856, 68892, 32123

Acknowledged. The site is serviced by a single vehicular access onto Landis Street, which is consistent with the existing road network arrangement and is appropriate having regard to the road hierarchy under the Brisbane City Plan 2014. As outlined in the Town Planning Report (Section 7.1.3) and **Appendix C**, Landis Street functions as a Neighbourhood Road providing property access and local traffic distribution. From Landis Street the broader network is accessible via Rode Road (Suburban Road), and the future planned arterial connection to the west (refer Figure 11, Town Planning Report) is expected to further disperse traffic and improve network resilience. The traffic generation forecast for the development (refer **Appendix C**, Section 4.5) is well within the absorptive capacity of a Neighbourhood Road and does not warrant a secondary vehicular connection.

Submitters are concerned that the proposal will not provide enough on-site parking for residents, visitors and service vehicles. They argue this will force vehicles onto Landis Street, De Mille Street, Sinatra Crescent and nearby streets, reducing road width, affecting sight lines, obstructing access and worsening existing parking pressure.

35766, 52300, 65700, 74577, 80856, 91045, 91127, 74781, 32123

The submitters' concerns regarding parking are not supported by the technical assessment. Modus Traffic and Transport Engineering (**Appendix C**, Section 4.2) has provided a detailed parking provision and demand analysis in accordance with the BCC TAPS PSP. The revised proposal supplies 54 resident car parking spaces (2.0 spaces per 4-bedroom dwelling) and 8 visitor car parking spaces. While this constitutes a numerical shortfall of 14 resident spaces against the TAPS PSP rate of 2.5 spaces per 4-bedroom dwelling, the shortfall is supported by observed practical parking demand data for 4-bedroom medium-density dwellings (2.0 resident spaces per dwelling – NSW Guide to Transport Impact Assessment) and the high level of accessibility of the site to alternative modes of transport. The site is within a 5-minute walk of four bus stops along Beckett Road and Hamilton Road, within a 7-minute walk of McDowall Village Shopping Centre and essential daily services, and within a 10-minute walk of McDowall State School (Town Planning Report, Sections 7.1.2 and 7.1.3). Visitor parking exceeds the required rate (8 spaces provided against 7 required). On this basis the proposed parking provisions are deemed acceptable and on-street overflow is not anticipated.

Submitters state that existing townhouse development has already created speeding issues along Landis Street, with vehicles travelling as if it is a major road. They argue the proposed development will increase the prevalence of speeding and increase risks for pedestrians, children, residents and vulnerable road users.

91045, 91127, 32123

The submitters' concerns regarding speeding on Landis Street are noted; however, the regulation of vehicle speed on public roads is a matter for the Queensland Police Service and is not a matter within the scope of this development application. Landis Street is signed at 50 km/h, which is the prevailing limit for Neighbourhood Roads (**Appendix C**, Section 2.2). The proposed development does not alter the geometry of Landis Street, nor does it generate a volume of traffic capable of materially influencing prevailing travel speeds. The applicant respectfully notes that any concerns regarding driver behaviour on Landis Street should be directed to Council's traffic management area or the police for separate consideration.

Submitters raise concern about increased risk to pedestrians, cyclists, children, e-bike riders and scooter users. Particular concern is raised about the childcare centre, nearby park, school-related traffic, the pedestrian pathway beside the site, and children crossing between the childcare centre and park.

52300, 65700, 74577, 80856, 91045, 91127, 32123

The applicant is committed to delivering a development outcome that supports pedestrian and cyclist safety. As detailed in **Appendix C**, the proposed driveway achieves a 2.5m x 2.0m pedestrian sight splay at the egress point in accordance with AS2890.1, and a minimum 90m vehicle sight distance is provided in both directions along Landis Street. A dedicated pedestrian entry has been provided to the site at a minimum 1.2m width (refer to the RFI response, Item 7, and **Appendix A** – Revised Proposal Plans). The proposal generates a low order of additional traffic (one vehicle every 3 minutes and 32 seconds in the peak – **Appendix C**, Section 4.5) which does not materially elevate risk to pedestrians, cyclists or vulnerable road users. The footpath network along the site frontage and surrounding streets continues to provide a safe pedestrian environment, and the development supports active travel by providing 27 resident bicycle parking spaces (in garages) and 7 visitor bicycle parking spaces in accordance with the TAPS PSP (**Appendix C**, Section 4.3).

<p>Submitters identify the childcare centre as a sensitive nearby use. Concerns relate to traffic, parking, speeding and child safety during drop-off and pick-up periods, particularly where parked vehicles may reduce visibility.</p>	<p>35766, 52300, 55348, 74577, 91127, 32123</p>	<p>The presence of a nearby childcare centre is acknowledged and is noted in the Town Planning Report (Section 7.1.2, Figure 10) as one of the community facilities that contributes to the suitability of the site for a multiple dwelling development. The traffic generated by the proposed development is forecast at 17 vehicles per hour in the peak (Appendix C, Section 4.5), which is a small fraction of the existing traffic associated with the childcare centre drop-off and pick-up periods and does not materially alter the existing operating conditions on Landis Street. The proposed driveway achieves the minimum sight distance and pedestrian sight splay requirements of AS2890.1 (Appendix C, Section 4.1). The applicant is comfortable that the development can coexist with the childcare centre operations without compromising child safety.</p>
<p>Submitters raise concern that the site and adjoining gully are flood-prone. They refer to previous flooding, water rushing down De Mille Street, flooding of roads and properties, floodwaters near homes, and the creek or watercourse overflowing during heavy rain. Submitters argue additional roofs, driveways and hardstand areas will increase stormwater runoff and place more pressure on existing drainage infrastructure.</p>	<p>52300, 55348, 65700, 74577, 68892, 74781, 32123</p>	<p>The flood-related submissions have been considered against the technical flood assessment prepared by Bravo Consult Engineers and certified by an RPEQ (Appendix E – Flood Study Report). The site is identified as being within the Overland Flow Flood Planning Area of the Brisbane City Plan 2014 Flood Overlay. Hydrologic and hydraulic modelling has been undertaken using WBNM (rainfall-runoff) and TUFLOW (2D hydraulic) software, in accordance with SC6.11 Flood Planning Scheme Policy and Australian Rainfall and Runoff 2019 (Appendix E, Section 4). The modelling demonstrates that the proposed development does not create new off-site inundation areas, does not materially alter flood extents on adjoining properties, and does not result in a material increase in hydraulic hazard category on surrounding land (Appendix E, Table 5-1). The proposed development includes a designed overland flow conveyance corridor, a suspended driveway section, and habitable floor levels set above the 2% AEP flood level plus 500mm freeboard, in accordance with the Flood Overlay Code. Additional roof and hardstand runoff is managed via the on-site detention tank under the eastern driveway, which mitigates post-development peak flows to pre-development levels up to and including the 1% AEP storm event (Appendix D – Site-Based Stormwater Management Plan, Section 5.3).</p>

One submission raises specific concerns about the applicant's flood material, including peak flood depths exceeding 2 metres in parts of the site during a 2% AEP event, H5 extreme hazard conditions along the southern portion, and post-development flood level increases of 0.1 to 0.5 metres near the Landis Street frontage.

32123

The specific flood matters raised in submission 32123 have been considered. The Flood Study Report (**Appendix E**) has been prepared in accordance with the Brisbane City Plan 2014 Flood Overlay Code (Section 8.2.11) and SC6.11 Flood Planning Scheme Policy, using TUFLOW two-dimensional hydraulic modelling. The deeper flood depths referenced by the submitter (in the order of 2m) occur within the existing drainage corridor along the southern boundary of the site, which is an established overland flow path and is the subject of an existing Council drainage easement (EMT-A RP98956). The proposed development does not place habitable rooms within that flow path. With regard to flood levels in proximity to the Landis Street frontage, the modelling demonstrates that modelled flood depths on Landis Street remain generally less than 300mm during the assessed event and that localised changes in flood level occur primarily within the site and adjacent road reserve, with no material increase in flood levels on surrounding land (**Appendix E**, Table 5-1). The development incorporates flood-responsive design measures including a suspended driveway, a building undercroft for Townhouse 19, and finished floor levels set in accordance with Tables 5-2 and 5-3 of **Appendix E**. The overall conclusion of the RPEQ-certified Flood Study Report is that the proposal is consistent with the intent of the flood-related provisions of the Brisbane City Plan 2014.

One submission raises concern that Townhouse 19 requires an undercroft to maintain overland flow conveyance beneath the building, with final levels and structural design still to be confirmed. The concern is that this raises questions about the suitability of the site for 27 dwellings at this density.

32123

The submitter's concern regarding Townhouse 19 (TH19) is noted. The TH19 undercroft has been designed in accordance with the requirements of the Brisbane City Plan 2014 Flood Overlay Code (Table 8.2.11.3.E) and SC6.11 Flood Planning Scheme Policy, which expressly contemplate building undercrofts for overland flow conveyance where the area is subject to low hydraulic hazard conditions in the 2% AEP event. The detailed flood modelling for the TH19 undercroft (**Appendix E**, Section 5.2) demonstrates: a maximum flood depth beneath the building of approximately 0.40m (below the 0.60m threshold); a maximum velocity of approximately 1.5 m/s; and a maximum depth-velocity product ($d \times v$) of approximately 0.40 m²/s (below the 0.60 m²/s low-hazard threshold). The minimum undercroft clearance of 1.50m is provided in accordance with the Code, and the floor level for TH19 is set at RL 45.60m AHD, which is the governing of the freeboard-based and undercroft-clearance-based levels. The undercroft is intended solely for overland flow conveyance and is not proposed to be enclosed for storage or car parking. Final structural design will be confirmed at detailed design stage and can be the subject of a reasonable and relevant condition. The proposed design demonstrates that 27 dwellings can be appropriately accommodated on the site notwithstanding the overland flow constraint.

Submitters raise concern that the development is close to a creek, gully or waterway. Issues include building close to or on top of the creek, safety around the waterway, flooding, vegetation loss beside the waterway, and impacts on wildlife using the gully.

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The presence of the existing drainage corridor along the southern boundary of the site is acknowledged. The drainage corridor is an established Council drainage easement (EMT-A RP98956) which conveys overland flow and piped stormwater from the upstream catchment. The proposed development has been designed to maintain the existing drainage and overland flow function of this corridor, with all buildings set back from the easement and with revised civil works (**Appendix F**) reducing earthworks along the southern edge of the corridor to closer align with the existing approval over the site (Council Ref: A006211747). The Flood Study Report (Appendix E) and Site-Based Stormwater Management Plan (Appendix D) demonstrate that the proposal does not result in adverse off-site flood impacts and that the corridor will continue to function as an overland flow and drainage pathway. Vegetation and habitat values in proximity to the corridor are addressed through the approved Vegetation Retention Plan (consistent with Council approval A006620397) and the Landscape Plan (**Appendix B**), which proposes a planting framework that incorporates feature trees, screening shrubs and infill planting to soften the built form and provide ecological value.

Submitters object to the removal of mature native trees, including more than 30 significant trees. Concerns include loss of protected vegetation, large habitat trees, canopy loss, root damage to retained trees, and permanent impacts on the local environment.

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The proposed extent of vegetation removal and retention has been undertaken in accordance with the previously approved Vegetation Retention Plan prepared by S5 Environmental (Town Planning Report, Section 4.2.5) and is consistent with the existing approval over the site (Council Ref: A006620397 – Operational Works for Clearing/Vegetation). Tree numbers, removals, retained trees and tree protection zones have been mapped, and construction protection measures have been specified. The proposal also includes a comprehensive replacement planting strategy detailed in the Landscape Plan (**Appendix B**), prepared by Studio8 Concept+Design, which establishes a streetscape planting framework along Landis Street and De Mille Road, provides feature canopy trees throughout the site (including *Elaeocarpus reticulatus*, *Harpullia pendula*, *Waterhousea floribunda*, *Banksia* and *Magnolia* species), screening shrubs, and infill planting to soften the built form. The proposed deep planting areas are shown on the revised Site Plan (Appendix A). The proposed outcome is consistent with the Multiple Dwelling Code landscaping requirements (PO26–PO29 and PO35) and the Streetscape Hierarchy Overlay Code.

Submitters identify local wildlife including gliders, possums, birds, possible koalas, water dragons, reptiles, pythons, Rakali and other native species. They argue the site is a habitat area and wildlife corridor, and that vegetation removal and development will destroy or reduce the ability for wildlife to live on or move through the site.

35766, 52300, 55348, 65700, 67419, 74577, 68892, 74781, 32123

The applicant acknowledges that the local catchment provides habitat for native fauna, and the proposed development has been designed to be sympathetic to those values. The proposed extent of vegetation removal is consistent with the existing operational works approval over the site (A006620397) and the approved Vegetation Retention Plan (Town Planning Report, Section 4.2.5). The site is not mapped within a State-significant biodiversity area, a Koala Habitat Area, or a Matter of State Environmental Significance under the Planning Regulation 2017 (refer Town Planning Report, Section 5.3.1). The Landscape Plan (**Appendix B**) provides a comprehensive replacement planting framework, including indigenous and habitat-supporting species such as Banksia, Harpullia pendula, Elaeocarpus reticulatus, Waterhousea floribunda and Lomandra species, which support invertebrates, birds and small native fauna. The retention of the southern drainage corridor and its associated vegetation, together with the dry creek bed effect proposed in the landscape concept, maintains a habitat connection through the site.

Submitters specifically refer to water dragons living in the waterway or stormwater gully. They argue that vegetation clearing, construction and development close to the gully may significantly harm or displace them.

52300, 65700, 67419

The reference to water dragons in the southern drainage corridor is noted. The existing drainage corridor along the southern boundary will be retained as an overland flow path and will not be enclosed or converted to a piped drain. The proposed development includes revised civil works (**Appendix F**) that significantly reduce earthworks along the southern edge of the corridor relative to the original design, in order to closer align with the existing approval over the site. The Landscape Plan (**Appendix B**) proposes plantings adjacent to the corridor including Lomandra hystrix 'River Mat Rush', Lomandra 'Lime Tuff', Dianella, Hibbertia scandens and a dry creek bed effect, which together provide ground-level habitat structure consistent with the conditions favoured by water dragons and other small reptiles. Construction-phase impacts will be managed through the Erosion and Sediment Control measures detailed in Appendix G and the Site-Based Stormwater Management Plan (**Appendix D**).

Submitters argue that 27 townhouses is excessive, out of place and an overdevelopment of the site. Concerns include the proposal exceeding desirable density, being inconsistent with the Emerging community zone, being almost double the 18 dwellings per hectare benchmark, and not resolving the density concern through the revised proposal.

35766, 52300, 65700, 67419, 74577, 91045, 74781, 32123

The proposed dwelling yield of 27 townhouses has been arrived at through a substantive redesign in response to Council's Information Request, in which the originally proposed yield of 34 dwellings was reduced (refer **Appendix A** – Revised Proposal Plans, and the Response to Information Request, Item 1). The resulting density of approximately 33 dwellings per hectare sits comfortably within the established density range of recently approved multiple dwelling developments in the immediate Emerging Community zoned area of McDowall, as set out below (refer Town Planning Report, Section 7.1.1, Table B):

67 Landis Street – 44.40 dph; 906 Hamilton Road – 37.14 dph; 902 Hamilton Road – 40.95 dph; 112 Beckett Road – 37.40 dph; 36A Boulting Street – 35.93 dph; 11 Tuckeroo Street – 42.82 dph.

None of these approved comparable developments achieve a density of less than 35.5 dph and the average density is 39.18 dph. The proposed density therefore sits within the established prevailing range for the Emerging Community zone of McDowall and represents a logical continuation of the existing development character of the locality. The proposal is consistent with the Emerging Community zone code overall outcome at s6.2.6.2(c)(iii), which contemplates multiple dwellings 'at a larger scale and greater dwelling density appropriate for the site's location and commensurate with ease of access to services, facilities and high frequency public transport'.

Submitters say the development is not in keeping with the low-density, leafy suburban character of McDowall. Concerns include townhouse development being out of place, loss of spacious lots and yards, loss of neighbourhood character, and reduced residential amenity.

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The applicant respectfully notes that the subject site is zoned Emerging Community, not Low Density Residential. The Emerging Community zone is specifically intended to accommodate transitional residential development at higher densities, including multiple dwellings (refer Town Planning Report, Section 6.2.1 and 7.2.1). The site is also identified as a Potential Development Area within the McDowall Neighbourhood Plan (Figure (a) of s7.2.13.1 of City Plan), which signals the planning scheme's intent for development that addresses the location of the land, availability of services, environmental constraints, amenity and existing patterns of development. The surrounding development pattern in the immediate Emerging Community area is dominated by multiple dwelling townhouse estates (refer Figure 7 of the Town Planning Report). The proposed predominantly two-storey form, with appropriate setbacks, articulation and landscaping (refer revised proposal plans at **Appendix A** and Landscape Plan at **Appendix B**), represents a contextually appropriate built form for an Emerging Community zoned site that adjoins lower-density areas.

<p>Submitters raise concerns about density, height, bulk and building mass. One submission states the height, bulk and overall building mass are excessive compared to surrounding dwellings and will dominate the streetscape.</p>	<p>68892, 74781</p>	<p>The revised proposal has reduced the building height across the site to a predominantly two-storey built form, in direct response to Council's Information Request (Items 2 and 4 – refer Response to Information Request). All dwellings are now no greater than 2 storeys in height (refer Appendix A – Revised Proposal Plans). Building lengths have been significantly reduced and variation has been provided in the building line, in accordance with AO9.1 of the Multiple Dwelling Code. The 8.3m wide internal driveway provides a clear separation between built-form elements, with a minimum 9m building separation across the driveway area, supplemented by screening and privacy devices. Greater articulation, variation in roof form and shading elements have been incorporated to address the bulk and scale of the development and to provide a human scale consistent with the form and character of the neighbourhood. The revised built form is consistent with overall outcome 2(d) of the Emerging Community zone code and overall outcome 3(f)(ii) of the McDowall Neighbourhood Plan code.</p>
<p>Submitters raise loss of residential amenity through increased traffic, parking, congestion, noise, reduced safety, loss of privacy, reduced openness and loss of the quiet residential environment. Several submissions frame these concerns cumulatively, arguing the proposal compromises liveability, functionality and amenity.</p>	<p>65700, 91045, 91127, 74781, 32123</p>	<p>The cumulative amenity considerations raised by submitters have been addressed across the suite of supporting technical material. With regard to traffic and parking, Appendix C demonstrates that the development generates a low order of additional traffic (17 vehicles per hour in the peak, equating to one additional vehicle every 3 minutes and 32 seconds), provides parking in accordance with observed practical demand for 4-bedroom medium-density dwellings, and complies with AS2890.1 and the BCC TAPS PSP. With regard to noise, the predominantly two-storey built form, generous setbacks, internal driveway location and acoustic and visual screening (Appendix A and Appendix B) limit noise emission to surrounding properties. With regard to privacy, screening and other privacy techniques have been incorporated into the design including privacy film to windows and more solid balustrading (Response to Information Request, Item 3(vi)). With regard to openness and amenity, the revised design provides a centrally located communal open space with pool, BBQ and picnic spots, deep planting areas, a 1.2m wide pedestrian pathway, and revised landscape treatment along the internal driveway (Appendix B). The proposal is consistent with the amenity-related performance outcomes of the Multiple Dwelling Code and the Emerging Community zone code.</p>

<p>Submitters state that public transport in McDowall is already stretched, sporadic and unreliable. They refer to limited bus services and argue that residents will rely heavily on private vehicles, worsening traffic on local and arterial roads.</p>	<p>52300, 74577, 74781</p>	<p>The submitters' assessment of public transport accessibility is not supported by the technical material. As detailed in the Town Planning Report (Section 7.1.3) and the Traffic Engineering Report (Appendix C, Section 2.3), the site is within a 5-minute walk of four bus stops along Beckett Road and Hamilton Road, with the nearest bus stop (004059) located approximately 105m to 140m west of the site. Bus stop 004059 is serviced by Translink routes 352 and 353, and bus stop 004016 (approximately 355m north) is serviced by routes 350, 351 and 353. Together these stops provide multiple route choices and more than four bus services per hour in peak periods. The proposed development is well-positioned to take advantage of the existing public transport network, which is consistent with the State and Council planning policy direction of locating higher-density housing near public transport (refer ShapingSEQ 2023 – Town Planning Report, Section 7.2.3, and Brisbane's Housing Supply Action Plan).</p>
<p>Submitters argue the development provides expensive double-storey townhouses that do not address affordability or diverse housing needs. Concerns include limited suitability for older residents looking to downsize, and that the development appears driven by yield rather than affordable housing or housing built in harmony with the area.</p>	<p>52300, 74577</p>	<p>The proposed development is not promoted as affordable housing and the applicant has not represented it as such. The proposal does, however, deliver a significant uplift in housing supply (27 dwellings) on an existing under-utilised allotment within an established residential area, which contributes to housing supply, choice and diversity objectives at the regional level. ShapingSEQ 2023 expressly identifies that almost 900,000 new well-located homes are required in SEQ by 2046 and that more dwelling diversity is required, with a shift toward attached housing and apartments in well-located places (refer Town Planning Report, Section 7.2.3). The proposed development contributes to those objectives by providing 27 attached dwellings on land that is well-located in relation to centres, schools, parks and public transport. Housing affordability outcomes are also influenced by market supply – an increase in housing supply at this scale supports overall market affordability across the suburb.</p>
<p>Submitters refer to earlier proposals for 10, 14 or a smaller number of townhouses or lots, and question why the previous lower-density scheme was abandoned. They suggest the earlier proposal was more consistent with community expectations.</p>	<p>52300, 74577</p>	<p>Earlier development proposals over the site are noted. The site has been the subject of a number of historical applications (refer Town Planning Report, Section 3.2.4), including reconfiguration of a lot approvals and operational works approvals. The current application is for a Multiple Dwelling (27 units) and has been assessed against the current <i>Brisbane City Plan 2014 (v35)</i>, the relevant Assessment Benchmarks and Council's current Information Request response requirements. The relevant matter for assessment is whether the current proposal complies with, or can be conditioned to comply with, the Assessment Benchmarks under the <i>Planning Act 2016</i>. The applicant respectfully submits that the current proposal is the appropriate proposal for assessment and is supported by the comprehensive suite of technical reports submitted with the application and following the Information Request.</p>

<p>Submitters criticise the Modus traffic report. Issues raised include no existing traffic counts, no assessment of current traffic operations, no 10-year planning horizon assessment, no proper parking supply and demand assessment, no amenity impact assessment, reliance on an interstate NSW guide, no GTIA threshold assessment, and no assessment of Landis Street / Rode Road intersection safety.</p>	<p>80856, 32123</p>	<p>The Modus Traffic Engineering Report (Appendix C) has been prepared by Modus Traffic and Transport Engineering, an established traffic engineering consultancy, and the report has been signed off by Mr Harj Singh, Executive Director and Registered Professional Engineer of Queensland (RPEQ 22364). The methodology adopted is consistent with recognised industry practice and with the BCC TAPS PSP. The traffic generation rate of 0.6 vehicle trips per dwelling has been drawn from the NSW Guide to Transport Impact Assessment, which is a recognised source for medium-density residential traffic generation data routinely accepted by Queensland local governments where no equivalent Queensland-specific dataset is available. The resulting peak-hour generation of 17 vehicles per hour is well below the threshold typically warranting a full Traffic Impact Assessment under the relevant guidelines. Parking provisions are addressed in detail in Section 4.2 of Appendix C and are supported by reference to observed practical parking demand data. Site sight distance and crossover design have been assessed against AS2890.1 and the BCC TAPS PSP. The Modus report constitutes an appropriate level of traffic engineering assessment for a development application of this scale and is supported by RPEQ certification.</p>
<p>One submission argues the traffic report wrongly presents De Mille Street and Osmond Street as relevant vehicle access roads, creating the impression of multiple vehicle access options. The submitter states De Mille Street is separated by a watercourse and only connected by a pedestrian path, while all development traffic must use Landis Street and Rode Road.</p>	<p>80856</p>	<p>The applicant clarifies that the Modus Traffic Engineering Report (Appendix C) does not represent De Mille Street or Osmond Street as the vehicular access for the development. The report confirms at Section 3 that the proposed development is accessed via a single 7.0m wide crossover onto Landis Street. The reference to De Mille Street and Osmond Street in Table 2-1 of Appendix C is contextual only, identifying surrounding road characteristics, and the report does not assess them as access routes for the development. All development traffic is via Landis Street to Rode Road, which is the appropriate arrangement having regard to the road hierarchy and surrounding network.</p>
<p>Submitters raise cumulative impacts from existing and nearby developments, including 67 Landis Street and 69 Landis Street. Concerns include combined traffic volumes, parking pressure, cumulative intensification, stormwater impacts, pedestrian and cyclist safety, and erosion of neighbourhood character.</p>	<p>65700, 80856, 91045, 91127, 74781, 32123</p>	<p>Cumulative impacts of nearby approved and existing developments have been considered in the preparation of the supporting technical reports. The Site-Based Stormwater Management Plan (Appendix D, Section 3.9) and Flood Study Report (Appendix E, Section 2 and Section 4) both incorporate the upstream contributing catchment (approximately 2.4ha excluding the subject site) and adjacent developments, including the development to the north at 67 Landis Street, into the hydrologic and hydraulic modelling. The Traffic Engineering Report (Appendix C) similarly considers the broader operating conditions on Landis Street. The proposed on-site detention infrastructure has been sized to mitigate post-development peak flow rates to pre-development conditions up to the 1% AEP event (Appendix D, Section 5.3), thereby ensuring that the development does not contribute cumulatively to downstream flood impacts. With regard to traffic, the cumulative generation of additional dwellings in the locality remains well within the operational capacity of the existing road hierarchy.</p>

<p>Submitters argue that roads, drainage, schools, public transport and community facilities are not keeping pace with development. Concerns include additional pressure on infrastructure, reduced service levels and declining liveability.</p>	<p>52300, 74577, 74781</p>	<p>The applicant submits that the proposed development supports more efficient use of existing infrastructure rather than creating undue pressure on it. The Town Planning Report (Section 7.2.2) sets out the economic benefits of the proposed development, which is located in close proximity to existing schools, parks, public transport and the McDowall Village neighbourhood centre. Locating additional housing in this established suburban context is consistent with the ShapingSEQ 2023 'more homes, faster' priority, Council's Suburban Renewal Precincts program, and the Lord Mayor's anti-sprawl initiatives. Brisbane City Council's strategic position is to direct growth to well-located infill sites in order to better utilise the sunk investment in existing infrastructure, rather than greenfield expansion. Infrastructure charges payable in connection with the development (refer Town Planning Report, Section 6.2.6) will contribute to ongoing infrastructure renewal and augmentation by Council.</p>
<p>Concerns are raised about McDowall State School, school drop-off and pick-up congestion, and pressure on educational infrastructure including McDowall State School and Northside Christian College. One submitter argues the additional population will further strain school capacity and worsen traffic in school precincts.</p>	<p>52300, 74781</p>	<p>The proximity of the site to McDowall State School (approximately 650m – Town Planning Report, Section 7.1.2 and Figure 10) is identified in the Town Planning Report as a positive locational attribute of the site that supports active transport for school-aged residents and reduces reliance on short car trips. The proposed development provides 27 dwellings; this is not a scale of development that would, in itself, materially alter the catchment population or operating conditions of either McDowall State School or Northside Christian College, which are large institutions serving the broader McDowall area. Strategic planning for school capacity is a matter for the Queensland Department of Education and is informed by long-term population projections at the suburb level. The proposal is consistent with State and Council planning policy direction of locating additional housing within walking distance of schools.</p>
<p>Submitters refer to stormwater code non-compliance, erosion, environmental harm, and the sensitivity of the local environment. Concerns also relate to impacts on native animals and birds within the development area.</p>	<p>68892, 74781</p>	<p>The submitters' references to stormwater code non-compliance are not supported by the technical material. The Site-Based Stormwater Management Plan (Appendix D) has been prepared by Bravo Consult Engineers, certified by an RPEQ, and addresses the relevant provisions of the Brisbane City Plan 2014 Stormwater Code, the Queensland Urban Drainage Manual (QUDM), Australian Rainfall and Runoff 2019, Healthy Waterways – Water by Design, and the State Planning Policy 2017. The proposed strategy provides for: capture of site runoff into a below-ground on-site detention (OSD) tank located beneath the eastern driveway; mitigation of post-development peak flows to pre-development conditions up to and including the 1% AEP event (DRAINS modelling); and water quality treatment using ATLAN StormSack and SPeLFilter pollutant traps modelled in MUSIC (Appendix D, Section 6). Erosion and Sediment Control during the construction phase is addressed in the BCC Erosion Hazard Assessment Form (Appendix G), and detailed ESC plans can be conditioned at Operational Works stage. The lawful point of discharge is the existing Council stormwater drain in EMT-A RP98956 on the southern boundary, consistent with the pre-development condition.</p>

<p>Concerns are raised about driveway access, vehicle manoeuvring and servicing. One submission states the proposal relies on a single 7 m crossover, that access is constrained by services, and that the crossover is Type B1 where Type B2 is required for refuse collection vehicle access.</p>	<p>68892, 32123</p>	<p>The submitters' concerns regarding driveway access and servicing have been addressed in the revised proposal. The 7.0m wide Type B1 crossover proposed onto Landis Street has been adopted in order to avoid conflict with the existing Council stormwater gullies in the sag at the property frontage (refer Response to Information Request, Item 13). Modus Traffic and Transport Engineering has assessed the crossover and confirmed that the 7.0m crossover width at the property boundary, together with the 11.0m Landis Street carriageway, is sufficient to accommodate all private and service vehicle movements (Appendix C, Section 4.1.2). RPEQ-certified swept path assessments have been provided for both a 12.5m Large Rigid Vehicle (LRV equivalent to a Heavy Rigid Vehicle) and a BCC Rear Loader Refuse Collection Vehicle (RCV), confirming safe ingress and egress to all units (Appendix C, Section 4.5 and Appendix B of that report). The trade-off between a Type B2 crossover and the retention of the existing stormwater gullies is a site-specific engineering matter and the proposed approach is the appropriate response. Any matters of detailed servicing can be conditioned by Council.</p>
<p>Submitters request further studies before approval, including a flood risk assessment, full traffic impact study, revised or supplementary traffic assessment, independent hydraulic peer review, independent traffic and parking peer review, pedestrian and cyclist safety assessment, intersection safety assessment, and cumulative impact assessment.</p>	<p>52300, 80856, 32123</p>	<p>The applicant submits that the supporting technical reports already lodged with the application provide an appropriate level of assessment for a development application of this scale, and that further studies of the type requested by submitters are not warranted. The application is supported by: a Flood Study Report (Appendix E – Bravo Consult, RPEQ certified); a Site-Based Stormwater Management Plan (Appendix D – Bravo Consult, RPEQ certified); a Traffic Engineering Report (Appendix C – Modus, RPEQ certified); Civil Concept Drawings (Appendix F – Bravo Consult); a Landscape Plan (Appendix B – Studio8 Concept+Design); an Erosion Hazard Assessment Form (Appendix G); a Vegetation Retention Plan (S5 Environmental); and Revised Proposal Plans (Appendix A – Pembroke Construction). Each report has been prepared by a suitably qualified consultant and (where required) certified by an RPEQ. The reports have been prepared in accordance with the relevant assessment benchmarks under the Brisbane City Plan 2014 and applicable State guidelines. The applicant is comfortable that any residual matters can be addressed by way of reasonable and relevant conditions under section 65 of the <i>Planning Act 2016</i>.</p>

Several submitters request refusal of the application. Others request a substantial redesign, reduced dwelling yield, improved traffic safety, adequate parking, speed control measures, intersection upgrades, or a development more consistent with the planning scheme and character of McDowall.

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91045, 91127,
74781, 32123

Acknowledged. The applicant respectfully submits that the requested refusal of the application is not the appropriate planning outcome. The proposed Multiple Dwelling (27 units) has been substantively redesigned in response to Council's Information Request, including a reduction in dwelling yield from 34 to 27, a reduction in maximum height to predominantly 2 storeys, a reduction in building length and an increase in building line variation, the provision of communal open space and increased landscape treatment, and revised servicing and stormwater design. The proposal has been assessed against the relevant Assessment Benchmarks under the Brisbane City Plan 2014 (v35), including the Strategic Framework, the Emerging Community zone code, the McDowall Neighbourhood Plan code, the Multiple Dwelling code, the relevant Overlay codes and the relevant Secondary Codes, with no significant planning issues identified (refer Town Planning Report, Section 8). The applicant respectfully requests that Council issue a favourable decision on the application, subject to reasonable and relevant conditions.

We do not foresee any major additional concerns from Council but wish to formally request that should Council have any additional or outstanding issues to please contact us prior to making a decision.

Kind regards,



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