

20 May 2026

Chief Executive Officer
Brisbane City Council
Development Services - Planning Services North
GPO Box 1434
BRISBANE QLD 4001

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

Council Reference: A006721031
Attention: Shirley Mills

Dear Shirley,

**RE: Response to Submissions Received during Public Notification –
Multiple Dwelling & Food and Drink Outlet at 299 Coronation Drive,
Milton**

This letter has been prepared to assist the Council in its assessment and consideration of submissions received during the statutory public notification period for the above pending Development Application. Public notification commenced on 1 April 2026 and concluded on 24 April 2026. Fourteen submissions have been received, all of which were objections.

The purpose of this response is not to respond individually to each submitter, but rather to acknowledge and address the primary matters raised throughout the submissions for Council's consideration. The response groups the submissions into the following matters:

- Residential land use conflict
- Height, scale, built form;
- Infrastructure capacity and overdevelopment
- Flooding
- Car parking and traffic
- Character, urban form and visual amenity
- Setbacks, deep planting and building separation
- Strategic planning and community consultation.

For the purpose of this summary, the submissions are referenced as:

- Submission 1: DAPublic-A006721031-20250304-28392
- Submission 2: DAPublic-A006721031-20250317-45583
- Submission 3: DAPublic-A006721031-20250413-17531
- Submission 4: DAPublic-A006721031-20250813-05799
- Submission 5: DAPublic-A006721031-20251120-74597.
- Submission 6: DAPublic-A006721031-20260203-12666
- Submission 7: DAPublic-A006721031-20260309-26684
- Submission 8: DAPublic-A006721031-20260416-41778
- Submission 9: DAPublic-A006721031-20260416-40161
- Submission 10: DAPublic-A006721031-20260421-61524
- Submission 11: DAPublic-A006721031-20260421-67644
- Submission 12: DAPublic-A006721031-20260424-86498
- Submission 13: DAPublic-A006721031-20260424-87091
- Submission 14: DAPublic-A006721031-20260429-09553.

Relevant submissions	Matters raised in submissions	Applicant's response
1, 3, 4, 7, 8, 9, 10, 11, 12, 13, 14.	<p>Residential land use conflict</p> <p>Conflict with the Office precinct of the Milton neighbourhood plan.</p> <p>Residential use not supported in mixed-use office precinct.</p> <p>Residential use is inconsistent with the intent of the Planning Scheme.</p>	<p>It is acknowledged that Overall outcome 6 of the Milton neighbourhood plan code identifies residential development as not being expected within the Office Precinct. The proposed residential use results in Impact Assessment and trigger public notification. The planning scheme is not however intended to place a prohibition on residential uses within this locality and such a use can still be considered on its merits.</p> <p>Brisbane City Plan 2014 operates as a performance-based planning scheme requiring Impact Assessable Development Applications to be assessed having regard to the planning scheme as a whole, relevant assessment benchmarks, site context and other relevant matters. The proposal has been assessed against the broader Strategic Framework, Mixed use zone code and Milton neighbourhood plan code.</p> <p>The Strategic Framework identifies Milton as an Inner City corridor hub at the edge of the City Centre intended to accommodate significant urban activity, transit-oriented development and high-density residential outcomes. The proposal is considered to support this broader strategic intent given the site's highly accessible inner-city location proximate to public transport infrastructure, the Brisbane River and the City Centre.</p> <p>Further, section 45.5.b. of the Planning Act 2016 provides</p>

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		<p>that an Impact Assessable application “may be carried out against, or having regard to, any other relevant matter”. The Act identifies examples of relevant matters including “a planning need” and “the current relevance of the assessment benchmarks in light of changed circumstances”.</p> <p>Several Brisbane City Council strategic policy documents have been released since adoption of the current Milton neighbourhood plan, including Brisbane’s Inner City Strategy (BICS), the Sustainable Growth Strategy, and the Housing Supply Action Plan. While not statutory planning instruments, these policy documents identify the Council’s broader strategic direction in response to Brisbane’s projected population growth, housing supply pressures, and community desire and need to accommodate additional housing within well-located, transport-oriented inner-city areas. Housing supply pressures are therefore considered relevant planning needs for the purpose of section 45.5.b. of the Act.</p> <p>The office market analysis submitted in support of the application identifies materially changed market conditions, including reduced demand and elevated office vacancy rates. These matters are relevant considerations in assessing the current relevance of the assessment benchmarks in light of changed circumstances.</p> <p>To the extent there is considered to be a level of conflict with the planning scheme, the proposal is considered supportable having regard to the planning scheme as a whole, the Strategic Framework, the site’s strategic inner-city location and the relevant matters identified under section 45.5.b. of the Planning Act 2016.</p>
2, 9, 10, 11, 12, 13, 14.	<p>Height, scale, built form</p> <p>Excessive height and scale of the proposed development.</p> <p>Proposal exceeds the intended built</p>	<p>Concerns regarding the height and scale of the proposed residential tower are noted. Whilst the proposal seeks a building height that exceeds the Acceptable Outcome in the Centre or mixed use code, it is considered that the proposal satisfies the corresponding Performance Outcomes.</p> <p>No specific building height is prescribed for the Office 3a sub-precinct of the Milton neighbourhood plan. The proposal has been appropriately assessed against PO1. Having regard to the site’s size, dual street frontages,</p>

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	<p>form outcomes and height transition.</p> <p>Office and residential tower heights should be determined by the site size and location.</p>	<p>proximity to the City Centre and major public transport infrastructure, together with the proposed setbacks, landscaping and building separation, the proposal is considered to achieve an appropriate height, scale and form outcome for the site.</p> <p>The proposal maintains the same building height of RL110.05m as the approved office tower over the site (A006315084). The increase in storey count reflects differing floor-to-ceiling requirements associated with residential development. Council previously determined, under approval A006315084, that a tower development of this scale on the subject site was consistent with the amenity and character, community expectations and infrastructure assumptions for the site, having regard to the site's dual frontage and area of 2,339m², proximity to the Brisbane River, Coronation Drive, Milton Ferry Terminal and surrounding mixed use context.</p> <p>Whilst overall outcome 6.a. of the Milton neighbourhood plan code anticipates medium-rise office development within the Office precinct, the proposal remains consistent with the broader strategic intent of the neighbourhood plan by capitalising on the site's proximity to the Brisbane River, City Centre and major public transport infrastructure in accordance with overall outcomes 3.a. and 3.b. The proposed height and scale is considered to comply with the relevant performance outcomes of the Milton neighbourhood plan code and Centre or mixed use code.</p>
<p>1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 14.</p>	<p>Infrastructure capacity and overdevelopment</p> <p>Excessive density and overdevelopment within Milton.</p> <p>Cumulative strain on existing infrastructure, transport and servicing networks.</p>	<p>Existing policy through the Milton neighbourhood plan, Mixed use (Inner city) zone and Strategic Framework of Brisbane City Plan 2014 supports significant urban activity, increased residential density and transit-oriented growth in this location.</p> <p>The site is identified within the Milton Corridor Hub (CH1) on Strategic Framework Map SFM-003 and forms part of the Inner City area, which the Strategic Framework identifies as accommodating the city's highest concentration of employment, residential development and public transport infrastructure.</p> <p>Overall outcome 3.d. of the Milton neighbourhood plan code states that development is to be of a height, scale and</p>

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	<p>Increased pressure on public transport capacity.</p> <p>Intensification occurring without broader infrastructure planning or strategic review.</p>	<p>form consistent with community expectations and infrastructure assumptions intended for the precinct. Whilst the proposal introduces a residential land use within the Office precinct, the Council's previous assessment of the approved office tower (A006315084) concluded that existing infrastructure within the precinct, including stormwater, sewer, road and public transport networks, is well established and has capacity to accommodate increased density.</p> <p>The submitted material includes technical assessments by suitably qualified consultants, including RPEQ-certified traffic, civil and hydraulic engineers, which conclude that the development can be appropriately serviced and accommodated within the existing infrastructure network.</p> <p>The development will also contribute approximately \$5,201,804.48 in infrastructure charges, subject to Council's final calculation, toward the delivery and augmentation of trunk infrastructure under the infrastructure charging framework established by the Planning Act 2016.</p>
<p>1, 2, 4, 7, 10, 12, 14.</p>	<p>Flooding</p> <p>Development site is in a flood prone area.</p> <p>Objection to high density towers in flood prone areas.</p>	<p>The site is located within the Brisbane River flood planning area 5 sub-category of the Flood overlay, being the lowest flood risk planning sub-category. The submitted flood and stormwater assessments demonstrate that the proposed development can be developed in accordance with Engineering Best Management Practice, Brisbane City Council requirements, QUDM (2017) and the State Planning Policy (2017).</p> <p>The submitted material concludes that the site has no flood levels or flags applicable to building development and is subject to a low risk of flooding from the Brisbane River.</p> <p>Table SC1.1.2 in Schedule 1 of Brisbane City Plan 2014 does not identify the proposed land uses as vulnerable uses, difficult to evacuate uses or essential community infrastructure. Notwithstanding this, the proposal has been assessed against the Flood overlay code and relevant flood immunity and evacuation requirements.</p>
<p>1, 3, 5, 9, 10, 11, 12, 14.</p>	<p>Car parking and traffic</p>	<p>Figure a of the Transport, access, parking and servicing code identifies the development site within the City Frame, where minimum car parking rates apply. Unlike sites within</p>

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	<p>Excessive car parking provision. 291 carparks for 192 apartments seems excessive.</p> <p>Visitor car parking spaces should be removed to encourage the use of active and public transport.</p> <p>Residential car parking should be limited and built below ground.</p> <p>Traffic issues at the intersection near Fort Lane, Park Road and McDougall Street.</p>	<p>the City Core, the City Plan does not prescribe maximum parking rates for the subject site.</p> <p>The City Plan requires a minimum provision of 270 car parking spaces for the proposed development. The proposal provides 291 spaces, representing a modest increase above the minimum requirement. The proposal also provides a reduction in visitor car parking from the required 29 spaces to 19 spaces.</p> <p>The proposal provides car parking across three basement levels and four above-ground podium levels. Whilst the Milton neighbourhood plan does not contain specific podium parking design provisions, the podium has been designed in accordance with the relevant provisions of the Centre or mixed use code, including façade articulation and architectural treatments to reduce visual bulk and improve streetscape outcomes.</p> <p>Concerns regarding broader congestion and traffic conditions within the wider road network are acknowledged. These matters extend beyond the scope of the development application and broader network planning functions. The submitted traffic engineering assessment concludes that the proposal can be appropriately accommodated within the existing transport network.</p>
2, 9, 10, 12, 19.	<p>Character, urban form and visual amenity</p> <p>Character and urban form concerns.</p> <p>Continuous line of high rise towers along Coronation Drive conflicts with the intended building height transition and character outlined in the</p>	<p>Overall outcome 5 of the Mixed use zone code provides that development is to be of a height, bulk, scale and form tailored to its specific location and site characteristics, including the surrounding neighbourhood and proximity to public transport infrastructure. The proposed tower is considered an appropriate intensity for the site, having regard to its inner-city location within the high-density suburb of Milton and proximity to the City Centre and significant public transport infrastructure.</p> <p>Overall outcomes 3.a. and 3.b. of the Milton neighbourhood plan contemplate development which capitalises on the area's proximity to the City Centre, public transport and the Brisbane River, together with an intensity of office and residential development which encourages active use of the river corridor along Coronation Drive. The proposal is considered consistent with these strategic</p>

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	<p>City Plan.</p> <p>An urban form of high-rise towers along Coronation Drive is not a desirable visual aesthetic and does not align with the character intent of the City Plan.</p> <p>Tower in this location will obstruct river views from surrounding residential buildings.</p>	<p>outcomes given its location, built form and activation of the river corridor.</p> <p>Theme 5: Brisbane's CityShape Strategic Outcome 1.b.iii. identifies Milton as a corridor hub at the edge of the City Centre, intended to provide seamless transition and connections to the Selected Transport Corridors. The proposed residential tower is considered an appropriate high-density built form outcome that supports the strategic role and transition function of the Milton corridor hub within this highly accessible inner-city location.</p> <p>Theme 2: Brisbane's Outstanding Lifestyle Strategic Outcome 1.b. identifies Brisbane's urban form as being characterised by concentrated centres along transport corridors and the Brisbane River, with neighbourhoods expressing their individual identity. The proposed tower reinforces Milton's established inner-city character and contributes to a coherent urban corridor outcome along Coronation Drive through a consistent built form and density.</p>
9, 13.	<p>Setbacks, deep planting and building separation</p> <p>Limited setbacks restrict deep planting and building separation.</p> <p>Setbacks associated with Level 4 and above require further consideration.</p> <p>Though not prescribed, greater consideration should be given where exceeding</p>	<p>The Milton neighbourhood plan does not prescribe specific setback requirements. Therefore, setbacks are in accordance with Table 9.3.3.3.C of the Centre or mixed use code and the corresponding PO26.</p> <p>The proposal incorporates setbacks generally consistent with the previously approved office tower (A006315084), with increased tower setbacks introduced through the amended design and minor change process. Increased setbacks are provided to portions of the tower adjoining the commercial office building fronting Coronation Drive, with setbacks generally ranging between 5m and 7.317m.</p> <p>The proposed setbacks, together with the articulated tower design and landscaping treatments, are considered sufficient to maintain appropriate building separation, minimise amenity impacts and avoid prejudicing the future development potential of adjoining sites. It is considered that the proposal achieves PO26.</p> <p>AO27.1 of the Centre or mixed use code provides that development ensures building separation complies with Table 9.3.3.3.E. Whilst the acceptable outcome identifies a</p>

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	<p>15 storeys.</p> <p>Proposed setbacks, building separation and deep planting are not appropriate will disrupt amenity and views.</p>	<p>12m building separation, the corresponding performance outcome is considered the more relevant assessment benchmark in this instance given the site adjoins predominantly commercial development and the proposal comprises a single tower form.</p> <p>The proposal incorporates façade articulation, modulation and landscaping treatments to reduce the perception of bulk and improve visual separation between built form elements. The proposed separation distances, together with the orientation of adjoining commercial buildings and existing access easement arrangements, are considered sufficient to appropriately address amenity, privacy and future development considerations. It is considered that the proposal achieves PO27.</p>
<p>1, 2, 3, 4, 7, 8, 9, 10, 14.</p>	<p>Strategic planning and community consultation</p> <p>Disregard for planning framework and performance outcomes.</p> <p>Application is being considered on individual merit rather than through strategic planning.</p> <p>The proposal should not be considered in isolation and instead requires coordinated precinct planning.</p> <p>Community concerns have not been</p>	<p>Submitters' concerns regarding broader strategic planning, community expectations and future planning for Milton are acknowledged. Brisbane City Plan 2014 operates within the statutory framework established by the Planning Act 2016 as a performance-based planning scheme, whereby Development Applications are assessed on their individual merits having regard to the planning scheme as a whole, relevant assessment benchmarks, strategic intent, site context and community feedback.</p> <p>While the Milton neighbourhood plan identifies an intent for office development within the Office precinct, the Strategic Framework simultaneously identifies Milton as an Inner City corridor hub at the edge of the City Centre intended to accommodate significant urban activity, transit-oriented development and high-density residential outcomes. The proposal is therefore considered to support the broader strategic intent of the planning scheme for intensified development within highly accessible inner-city locations.</p> <p>It is acknowledged that the proposal introduces a residential land use outcome within the Office precinct and therefore gives rise to Impact Assessment and public notification under the Planning Act 2016. The proposal has appropriately facilitated public notification and consideration of submissions as part of the statutory assessment process.</p>

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	<p>adequately addressed.</p> <p>Neighbourhood plan should be reviewed in consultation with community.</p> <p>Development would set undesirable precedent for further office-to-residential conversions and additional high-rise development inconsistent with existing planning controls.</p>	<p>Requests for broader precinct-wide planning review or amendment of the neighbourhood plan extend beyond the scope of the current Development Application. Notwithstanding this, the application is required to be assessed against the existing statutory planning framework, including the Strategic Framework and relevant assessment benchmarks of Brisbane City Plan 2014.</p> <p>Community and Council expectations regarding the appropriate height and scale of development on the site have also been informed by the previously approved office tower development (A006315084), which established a 25-storey built form outcome on the site following detailed assessment against the relevant provisions of the City Plan and Planning Act.</p>

We thank the Council for their ongoing consideration of the pending Development Application. We believe the proposal at hand provides a positive planning outcome for the subject site and that the information provided is sufficient for the Council to positively determine the Development Application. However, should further information or clarification be required, please contact our Brisbane office.

Yours faithfully

URBAN STRATEGIES PTY LTD



Geoff Gibbons
DIRECTOR