

Dear Tyrah,

1. Introduction

I refer to my previously lodged submissions regarding the above impact assessable development application.

I have now reviewed the applicant's amended plans dated 1 May 2026, together with the subsequently submitted amended landscape plans (**Attachment A**).

The amended plans do not materially respond to the substantive concerns raised in my original submission, nor do they address the matters identified by Council in its Information Request.

Most notably, the proposal continues to present an unacceptable, overbearing and grossly non-compliant built-to-boundary outcome ... with the fundamental western interface condition remaining effectively unchanged.

2. Western Boundary Interface Remains Fundamentally Unchanged

I note Council's Information Request specifically raised concern that the western side boundary wall height would negatively impact the amenity of adjoining properties and did not comply with **PO7 of the Multiple dwelling code**, requesting reductions in wall height, a stepped built form outcome and additional landscaping to reduce visual bulk and improve the interface condition.

The amended plans dated 1 May 2026 fail to address these concerns in any meaningful respect.

They do not reduce the height, length, scale or dominance of the western built-to-boundary wall. They do not provide the increased setback, stepped built form or genuine deep planting response requested by Council. The amended plans therefore leave the fundamental western boundary interface problem unchanged.

Instead, the applicant has simply attempted to add a trellis and climbing vegetation treatment to the face of the same non-compliant wall. This is a cosmetic device, not a planning response. It does not reduce the built form, does not reduce the wall height, does not reduce the wall length, does not provide a compliant setback, and does not deliver any substantive improvement to the amenity outcome experienced from 17 Swinburne Street.

In practical terms, the amended plans seek to disguise, rather than resolve, an unacceptable built form outcome. The proposal remains grossly non-compliant, visually dominant and overbearing, and continues to fail the basic interface outcomes required by the Multiple dwelling code.

The amended western elevation (**Figure 1**) continues to show a built-to-boundary wall with:

- a **maximum height of approximately 4.5 m;**
- an **average height of approximately 4.0 m;** and
- a **continuous length of approximately 22 m.**



**Figure 1 - Non-Compliant Built-to-Boundary Wall
(Western Elevation – Amended Plans 1 May 2026)**

This outcome is clearly non-compliant with City Plan benchmarks intended to protect residential amenity. In particular, built-to-boundary walls are contemplated to be limited to **3.0 m in height** and a **maximum cumulative length of 15 m** (AO7.2(g) and AO7.3(a)).

- **City Plan acceptable outcome:** 3.0 m × 15.0 m (≈ 45 m²)
- **Proposed outcome:** 4.5 m (avg 4.0 m) × 22 m (≈ 88 m²)

The proposed western boundary wall therefore remains approximately **twice the scale of the acceptable solution** contemplated under City Plan.

When viewed ... the wall remains unacceptably overbearing, materially restricting outlook, reducing access to natural light and breezes, and eliminating any meaningful opportunity for deep planting and landscape buffering.

The proposal continues to fail the Multiple dwelling code outcomes requiring development to minimise visual dominance and overlooking (**PO3**) and to provide setbacks that enable meaningful landscaping and protect residential amenity (**PO7**).

3. Amended Landscape Plans Fail to Resolve Interface Concerns Unresolved

I have also reviewed the applicant's amended landscape plans (**Attachment A**). These plans do not resolve the western boundary interface concerns and, in several respects, further reinforce the conclusion that the proposal remains fundamentally unacceptable.

At the outset, I note the amended landscape package includes an elevation to Reid Lane (eastern interface) but notably does not provide a corresponding elevation or detailed landscape section for the most critical and offending interface — namely the excessive height built-to-boundary wall along the western boundary ...

The omission of any western landscape elevation is notable. Given the western boundary interface is the principal issue identified by Council's Information Request, and the most sensitive adjoining residential interface, the absence of any detailed visual representation of this boundary limits transparent assessment of the proposal and avoids proper scrutiny of the true scale and dominance of the built-to-boundary wall.

The amended landscape plans also raise a number of additional concerns regarding their practical viability and compliance with City Plan landscape outcomes:

- **Western boundary planting / vine trellis is not a genuine landscape response**

The reliance on vines attached to a trellis on the western built-to-boundary wall reinforces the inadequacy of the amended design response. This is not meaningful landscape buffering; it is a superficial greening treatment applied to the face of the same excessive wall. There does not appear to be any realistic opportunity for these vines to establish in natural ground, given the basement wall / footing / capping beam condition at the western boundary (the detail of which are omitted from the plans). Further, ongoing maintenance of the vines and trellis would appear impossible ...

This further demonstrates that the amended landscape response is not credible, durable or capable of resolving the western boundary amenity impacts.

- **Non-compliant podium planter depth on the western side**

Trees proposed within the western podium planter appear to rely upon approximately 800mm soil depth only, which is substantially less than the 1500mm soil depth requirement as identified within **Brisbane City Council BSD-9004** for meaningful tree establishment. If the planter were amended to provide a compliant soil depth, this would require an additional depth of approximately 700mm, which would further increase the effective height and visual dominance of the western built-to-boundary wall.

- **Failure to provide meaningful side boundary landscape buffer**

The proposal continues to fail to provide an adequate side boundary setback capable of accommodating meaningful landscape buffering. In particular, the western boundary interface does not appear capable of achieving the 1.5m buffer planting width contemplated by PO28 / AO28.2, further reinforcing the overbearing and visually dominant nature of the built form outcome.

- **Deep planting non-compliance to Reid Lane**

The purported deep planting zone to the Reid Lane frontage appears compromised by underground services and building overhangs, reducing both the functionality and integrity of the deep planting outcome. This calls into question whether the proposal genuinely satisfies the intent of the deep planting provisions.

Taken collectively, the amended landscape plans do not resolve the fundamental issue previously identified by Council and the submitters — namely that the proposal fails to provide a reasonable and appropriately landscaped interface

outcome to adjoining properties. Instead, the landscape package relies upon superficial greening treatments to visually soften a built form outcome that remains fundamentally excessive in scale and non-compliant in character.

4. Previous Concerns Remain Unresolved

Beyond the western boundary interface, I confirm that all concerns raised in my original submission remain unresolved.

Importantly, the amended plans do not materially alter the proposal in a manner that addresses the key issues previously identified, including:

- the practical feasibility of constructing the basement excavation and retaining wall condition as shown, particularly having regard to the significant excavation depth and extremely constrained offset to the western boundary;
- the continued risk that the proposal sterilises or materially constrains the future orderly and efficient development potential
- unresolved privacy and overlooking impacts associated with the western interface; and
- the absence of a meaningful setback and landscape response capable of softening the built form and reducing visual dominance.

The amended plans leave the fundamental problems unchanged from the version previously publicly notified. As such, the concerns previously raised by Council and residents remain unresolved.

5. Recommendation

For the reasons outlined in previous submissions and above, I respectfully submit that the amended plans dated 1 & 7 May 2026 fail to address the concerns previously raised by Council or adjoining residents.

The proposal remains fundamentally unchanged in terms of the western boundary interface and continues to present a grossly non-compliant, visually dominant, overbearing and unacceptable built-to-boundary outcome.

Accordingly, I respectfully request that Council require a substantive redesign of the western boundary interface, including a materially increased setback, genuine deep planting opportunity and meaningful reduction in wall scale and visual dominance, **or otherwise refuse the application.**

Yours faithfully,

Brisbane City Council
Development Assessment – City Planning and Sustainability
Public Notification Submission (Development.i)

Attention: Tyrah Zarafa, Senior Urban Planner

Re: Supplementary Submissions – Amended Plans (1 May 2026); Amended Landscape Plan (7 May 2026)
Council Reference: A006774817
Site: 11 & 15 Swinburne Street, Lutwyche QLD 4030
Date: 14 May 2026

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Most notably, the proposal continues to present an unacceptable, overbearing and grossly non-compliant built-to-boundary outcome with the fundamental western interface condition remaining effectively unchanged.

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They do not reduce the height, length, scale or dominance of the western built-to-boundary wall. They do not provide the increased setback, stepped built form or genuine deep planting response requested by Council. The amended plans therefore leave the fundamental western boundary interface problem unchanged.

Instead, the applicant has simply attempted to add a trellis and climbing vegetation treatment to the face of the same non-compliant wall. This is a cosmetic device, not a planning response. It does not reduce the built form, does not reduce the wall height, does not reduce the wall length, does not provide a compliant setback, and does not deliver any substantive improvement to the amenity outcome

In practical terms, the amended plans seek to disguise, rather than resolve, an unacceptable built form outcome. The proposal remains grossly non-compliant, visually dominant and overbearing, and continues to fail the basic interface outcomes required by the Multiple dwelling code.

The amended western elevation (**Figure 1**) continues to show a built-to-boundary wall with:

- a **maximum height of approximately 4.5 m**;
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The proposal continues to fail the Multiple dwelling code outcomes requiring development to minimise visual dominance and overlooking (**PO3**) and to provide setbacks that enable meaningful landscaping and protect residential amenity (**PO7**).

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At the outset, I note the amended landscape package includes an elevation to Reid Lane (eastern interface) but notably does not provide a corresponding elevation or detailed landscape section for the most critical and offending interface — namely the excessive height built-to-boundary wall along the western boundary

The omission of any western landscape elevation is notable. Given the western boundary interface is the principal issue identified by Council's Information Request,

the absence of any detailed visual representation of this boundary limits transparent assessment of the proposal and avoids proper scrutiny of the true scale and dominance of the built-to-boundary wall.

The amended landscape plans also raise a number of additional concerns regarding their practical viability and compliance with City Plan landscape outcomes:

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The reliance on vines attached to a trellis on the western built-to-boundary wall reinforces the inadequacy of the amended design response. This is not meaningful landscape buffering; it is a superficial greening treatment applied to the face of the same excessive wall. There does not appear to be any realistic opportunity for these vines to establish in natural ground, given the basement wall / footing / capping beam condition at the western boundary (the detail of which are omitted from the plans). Further, ongoing maintenance of the vines and trellis would appear impossible

. This further demonstrates that the amended landscape response is not credible, durable or capable of resolving the western boundary amenity impacts.

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Trees proposed within the western podium planter appear to rely upon approximately 800mm soil depth only, which is substantially less than the 1500mm soil depth requirement as identified within **Brisbane City Council BSD-9004** for meaningful tree establishment. If the planter were amended to provide a compliant soil depth, this would require an additional depth of approximately 700mm, which would further increase the effective height and visual dominance of the western built-to-boundary wall.

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The proposal continues to fail to provide an adequate side boundary setback capable of accommodating meaningful landscape buffering. In particular, the western boundary interface does not appear capable of achieving the 1.5m buffer planting width contemplated by PO28 / AO28.2, further reinforcing the overbearing and visually dominant nature of the built form outcome.

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The purported deep planting zone to the Reid Lane frontage appears compromised by underground services and building overhangs, reducing both the functionality and integrity of the deep planting outcome. This calls into question whether the proposal genuinely satisfies the intent of the deep planting provisions.

Taken collectively, the amended landscape plans do not resolve the fundamental issue previously identified by Council and the submitters (neighbours) - namely that the proposal fails to provide a reasonable and appropriately landscaped interface outcome to adjoining properties. Instead, the landscape package relies upon superficial greening treatments to visually soften a built form outcome that remains fundamentally excessive in scale and non-compliant in character.

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Importantly, the amended plans do not materially alter the proposal in a manner that addresses the key issues previously identified, including:

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- the continued risk that the proposal sterilises or materially constrains the future orderly and efficient development potential of
- impacts associated with the western interface; and
- the absence of a meaningful setback and landscape response capable of softening the built form and reducing visual dominance.

The amended plans leave the fundamental problems unchanged from the version previously publicly notified. As such, the concerns previously raised by Council and residents remain unresolved.

5. Recommendation

For the reasons outlined in previous submissions and above, I respectfully submit that the amended plans dated 1 & 7 May 2026 fail to address the concerns previously raised by Council or residents.

The proposal remains fundamentally unchanged in terms of the western boundary interface and continues to present a grossly non-compliant, visually dominant, overbearing and unacceptable built-to-boundary outcome.

Accordingly, I respectfully request that Council require a substantive redesign of the western boundary interface, including a materially increased setback, genuine deep planting opportunity and meaningful reduction in wall scale and visual dominance, **or otherwise refuse the application**.

Yours faithfully,

Attachment A –
Amended Landscape Plans
(May 2026)



