



10 September 2026

Brisbane City Council
Attn: Allan Nguyen, Urban Planner
Emailed to: allan.nguyen@brisbane.qld.gov.au

Dear Allan,

RE: SUBMISSION SUMMARY AND APPLICANT RESPONSE
212-220 SHAFSTON AVENUE, KANGAROO POINT
COUNCIL REFERENCE: A007021113

1. OVERVIEW

This report provides a summary of the submissions received to date in relation to the development application for a Multiple Dwelling at 212–220 Shafston Avenue, Kangaroo Point (Council reference A007021113).

The application seeks approval for a 24-storey Multiple Dwelling comprising 84 units.

A total of seven (7) submissions is recorded on Council’s online system. The issues raised in the submissions have been reviewed by the applicant and project team. A consolidated response to the matters raised is provided below.

2. SUMMARY OF FEEDBACK AND APPLICANT RESPONSE

The following community feedback and applicant response is provided to council.

Submission Item	Project Team Response
Building height	
The proposed building height exceeds the height under the neighbourhood plan. Submitters contend that the proposal is inconsistent with the	The proposed height has been deliberately considered having regard to the site's location, physical context and the established and emerging built form of Kangaroo Point. The nominated building height under the neighbourhood plan is not an absolute height limit. As an impact assessable application, the proposal is required to be assessed against the planning framework as a whole,

planning framework and that sufficient justification has not been provided for the additional height.	having regard to the particular circumstances of the site and development. The proposal adopts a slender tower form rather than distributing additional building bulk across the site. This allows substantial separation from adjoining development and provides opportunities for landscaping, deep planting and communal open space at ground and podium levels. The additional height also facilitates increased housing supply in a highly accessible inner-city location, close to public and active transport, employment and services. The proposal is considered to represent an appropriate contemporary response to the ongoing evolution and intensification of Kangaroo Point. Housing supply is recognised as a significant community need and is a relevant consideration in assessing whether a building height exceeding the applicable acceptable outcome is appropriate. In this instance, the site's strategic inner-city location, high level of accessibility and proximity to employment, services and public and active transport provide a strong basis for accommodating increased residential density. Importantly, the proposal does not rely on housing supply alone to justify the additional height. The development adopts a slender tower form which accommodates the proposed density while maintaining substantial building separation, reducing the extent of built form across the site and preserving important views to and from the Story Bridge. In this regard, the proposal responds positively to the intended outcomes of the Kangaroo Point peninsula neighbourhood plan, including Overall Outcome 3(c).
Bulk and scale	
Submitters are concerned about building bulk, visual dominance, tower separation and the maintenance of	The proposal has been designed as a relatively slender residential tower with setbacks that provide meaningful separation from adjoining residential buildings. The notified proposal provides tower setbacks of approximately 6m or greater to the side and rear boundaries, including an 8m setback to the northern tower wall. The building footprint and tower form have been

openness between buildings.	designed to avoid a broad or continuous built form across the site. The proposed setbacks, tower proportions, landscaping and architectural treatment work collectively to provide an appropriate relationship with adjoining development and maintain access to light, air and outlook. The acceptability of the development should therefore be considered having regard to its overall built form outcome rather than building height in isolation.
Privacy and overlooking	
Submitters, particularly residents of Carlisle at 89 Thorn Street, are concerned that the tower will overlook adjoining apartments, balconies and communal areas and result in a loss of privacy.	The tower has been designed with substantial physical separation from adjoining residential buildings. Privacy is also addressed through the orientation and design of apartments, balconies, landscaping and architectural treatments. In an established high-density inner-city environment, some degree of mutual overlooking between residential buildings is expected. The relevant consideration is whether reasonable residential privacy is maintained. The combination of tower separation, setbacks and design treatments is considered to provide an appropriate level of privacy, having regard to the site's high-density urban context. Furthermore, 89 Thorn Street is not directly aligned with the proposed building footprint. The separation and offset between the two sites mean limits presentation of a direct line of site from the proposed development toward 89 Thorn Street.
Wind and loss of breezes	
Submitters are concerned that the tower will affect existing breezes and may create wind tunnelling or turbulence around adjoining buildings and communal areas.	The proposed tower is separated from surrounding buildings and incorporates a slender built form which assists in maintaining permeability through the site and between buildings. The development does not create a continuous built wall along the boundaries. Detailed architectural and landscape treatments at the lower levels also assist in moderating the pedestrian environment. The potential for changes to local wind conditions is an

	expected consideration for high-rise development and can be appropriately addressed through detailed design where necessary.
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Traffic and road network

Concerns have been raised regarding additional traffic on Shafston Avenue, Wellington Road, Lytton Road and surrounding local streets. Submitters are also concerned about vehicles travelling through surrounding streets to access the Story Bridge and other destinations.	The development has been supported by a traffic engineering assessment addressing the anticipated traffic generation and operation of the proposed access. The site is located on Shafston Avenue, an established major transport corridor, and is highly accessible to public and active transport. The traffic generated is not considered to result in an unacceptable impact on the operation of the surrounding road network. The assessment of the development must also recognise the site's inner-city location and the availability of transport alternatives to private vehicle use.
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Vehicle access and Shafston Avenue bikeway

Submitters are concerned about the use of a single access point from Shafston Avenue and potential conflicts between residents, visitors, service vehicles, cyclists and pedestrians. Concerns have also been raised about the relationship between the driveway and the Shafston Avenue bikeway.	The proposed access arrangement has been subject to detailed traffic engineering consideration. A consolidated access point is preferable to multiple vehicle crossovers as it limits the number of potential conflict points along Shafston Avenue. The development has also been designed having regard to the proposed bikeway infrastructure along the frontage. Appropriate sightlines, driveway design, pedestrian priority and cyclist safety treatments can be incorporated into the final design and secured through conditions of approval. The proposed arrangement is capable of providing a safe and functional interface between vehicles, pedestrians and cyclists.
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On-street parking

Submitters consider that surrounding streets already experience parking pressure and that residents and visitors associated with the development may increase demand for unrestricted on-street parking.	The development provides on-site car parking for residents and visitors. The adequacy of parking is properly considered against the parking requirements and transport objectives applicable to the site, rather than on the basis that all potential parking demand must be prevented from occurring within surrounding public streets. The site's accessibility to public and active transport is also relevant to anticipated private vehicle ownership and use. The development is considered to provide an appropriate parking outcome for its inner-city location.
Construction management	
Concerns have been raised regarding the extent of basement excavation and potential impacts from rock excavation, vibration, noise, dust, ground movement and groundwater changes on nearby buildings.	These concerns principally relate to the detailed construction methodology rather than the land use and built form being considered through the development application. Basement construction will be required to comply with applicable engineering, building and construction requirements. Detailed geotechnical and structural design will be undertaken prior to construction, including appropriate excavation support and protection measures for adjoining properties. Construction impacts such as vibration, dust and noise can also be managed through appropriate construction management measures and relevant statutory requirements.
Construction impacts on the bikeway and pedestrian network	
Concerns have been raised that construction traffic, site access and construction activities may affect the operation and safety of the adjoining bikeway and pedestrian network.	Construction impacts are temporary and can be appropriately managed through a Construction Management Plan and associated traffic management arrangements. These measures can address construction vehicle movements, pedestrian and cyclist safety, temporary access arrangements and the continued operation of surrounding transport infrastructure. These matters do not warrant refusal of the development application and can appropriately be addressed through conditions and subsequent construction approvals.

Waste collection, servicing and acoustic impacts

Submitters are concerned about the operation of waste and service vehicles and potential noise associated with vehicle movements, the basement entrance and security gates.	The development incorporates on-site servicing and waste arrangements designed to accommodate the operational requirements of the proposed Multiple Dwelling. Vehicle movements associated with servicing form part of the traffic assessment of the proposal. Operational noise associated with a residential development, including vehicle access and waste servicing, can be appropriately managed through building design, operational requirements and conditions of approval where necessary.
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Neighbourhood character and landscaping

Concerns have been raised that the development will contribute to a "concrete jungle" and is inconsistent with the existing character and scale of Kangaroo Point.	The proposal provides a contemporary high-density residential development within an established inner-city locality undergoing continued renewal and intensification. The design responds to the strategic role of the site within the High density residential zone and its location within the Mowbray Park Precinct, while providing a strong landscape and public realm outcome. Importantly, the proposal adopts a slender tower form with substantial landscaping at ground, podium and rooftop levels. This approach enables a greater proportion of the site to contribute to deep planting, communal open space, landscape and public realm outcomes than would be achieved through a broader building footprint. The proposal therefore combines increased housing supply with a considered built form and landscape response that contributes positively to the evolving character of Kangaroo Point. The assessment of building height is appropriately undertaken in the context of the City Plan as a whole. The 12-storey acceptable outcome identified for the Mowbray Park Precinct provides an important built form benchmark. However, it is not expressed as an absolute maximum height. The planning framework allows for development to be assessed on its merits where a different built form
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	outcome can demonstrate an appropriate response to the relevant planning outcomes and the particular characteristics of the site and its surrounding context. The site's broader planning context supports a substantial level of residential density and built form intensification. The site is located within the up to 15 storeys precinct of the High density residential zone, being the highest building height precinct identified within that zone. This reflects the strategic role of the locality for higher-density residential development and provides an important context for considering the appropriate scale and form of development on the site. The proposal's height should therefore be considered together with its overall built-form strategy, including its slender tower footprint, separation, architectural expression, extensive landscaping, communal areas, public realm contribution and management of potential amenity impacts. These characteristics enable the development to accommodate residential density while maintaining a high-quality relationship with the site and its surrounding urban context. Extensive technical, architectural and planning assessments have been undertaken to demonstrate that the proposal achieves an appropriate overall planning, built form and amenity outcome. When considered in its entirety, the development represents a well-resolved response to the site's strategic context and supports the intended character, residential intensification and amenity outcomes for the Mowbray Park Precinct and the broader Kangaroo Point locality.
Precedent	
A submitter is concerned that approval of the development would establish a precedent for other developments	Each development application is assessed on its individual merits having regard to the characteristics of the particular site, the proposed development and the applicable planning framework. Approval of this application would not establish an automatic entitlement for comparable

seeking similar increases in height and intensity.

development on other sites. Any future proposal would be required to undergo its own assessment and demonstrate that its particular built form and impacts are acceptable.

3. CONCLUSION

The submissions primarily raise concerns regarding building height and scale, setbacks, residential amenity, traffic and parking, the Shafston Avenue bikeway and construction impacts.

These concerns have been considered by the project team.

While the proposal seeks a building height greater than that nominated by the neighbourhood plan, height is only one component of the overall planning and urban design assessment. The proposal adopts a slender tower form with substantial separation from adjoining development and incorporates landscaping and communal open space while providing additional housing in a highly accessible inner-city location.

Traffic, access, parking, servicing and construction matters have either been addressed through the technical assessment supporting the application or are capable of being appropriately managed through detailed design and conditions of approval.

The matters raised in the submissions therefore do not identify impacts that warrant refusal of the application. The proposal is considered to represent an appropriate high-density residential outcome for the site and the evolving Kangaroo Point context.

Should you have any questions, please do not hesitate to contact me.

Yours sincerely,



Simon Grice
Director