



Our Ref: 23-304  
27 February 2026

Chief Executive Officer  
Brisbane City Council  
GPO Box 1434  
BRISBANE QLD 4000

Dear Jack,

**RESPONSE TO FURTHER ADVICE – A006737871  
70 SYLVAN ROAD, TOOWONG**

We refer to Council's Further Advice dated 3 February 2026 and respond to the issues raised as follows.

**Building Height**

1. *The response to information request has resulted in an increase of four additional storeys and approximately 10m of building height built to the side boundaries due to the podium design. The podium height now exceeds the total building height of the adjoining multiple dwelling at 8 Jephson Street and results in an adverse amenity impact.*

*The information request response states the requirement for the additional podium levels is due to the road widening affecting the basement carpark geometry, however, the development still includes a basement level, as such, it is unclear why the development cannot support additional basement levels. It is noted the development provides 31 carparking spaces over the prescribed rate from the Transport, access, parking and servicing (TAPS) planning scheme policy (PSP).*

*Amendments to the proposal are required to mitigate adverse amenity impacts and ensure the proposal achieves the relevant assessment benchmarks. To this end, provide amended proposal inclusive of the below:*

- a. *Amend the proposal to reduce the external impacts of the podium. This includes but is not limited to:*
  - i. *Reducing podium height (Both physical height and number of storeys).*
  - ii. *Increasing podium setbacks above ground level to a minimum of 1m to facilitate landscaping.*
  - iii. *Reducing carparking numbers.*
  - iv. *Increasing landscaping along interfaces with adjoining sites.*

Changes to the proposed podium height, between the original lodgement of the application and the response to the Information Request, are largely a result of the revised access arrangement. The split access scenario was a necessary outcome to reduce the traffic

impacts to Sylvan Road in accordance with Council's original concerns, and this has necessitated an increase in the podium height. The access point to Jephson Street is significantly higher than the access to Sylvan Road.

Since the original lodgement, further geotechnical reporting has also been undertaken on site. The reporting shows significant rock below surface level. For both practical construction feasibility and to lessen the construction impacts on surrounding properties, it is therefore necessary to extend the podium level rather than extending the basement beyond that shown on the current plans. A reduction in car parking, beyond that outlined below, is not feasible in this location and with consideration to the type of housing product proposed.

However, with acknowledgement to Council's concerns regarding the extent of podium along the southern boundary, the updated plans provided demonstrate significant changes to maximise the visual amenity and reduce the dominance of the south-facing podium levels as much as possible.

The podium is now setback 550mm from the southern boundary along the full width of the building. This ensures all maintenance, particular of proposed vegetation, can happen within the property boundary. This setback has been achieved through the maximum possible tightening of the building core and ramps, noting that the proposed road resumption along Sylvan Road does not allow the building to shift northwards. A padmount transformer is now also proposed in the southwest corner of the site at ground level, and this has meant a reduction in the extent of podium wall along the extent of the southern boundary.

Nothing that the building was always proposed with a component of podium and podiums are a generally anticipated component of medium/high density residential development, further changes have been made to the upper levels of podium to avoid an excessive bulk and scale to the southern interface.

A carparking space (number 77) has been removed from the southwest corner of the level 3 podium. This has allowed for a chamfered corner and an overall reduced extent of podium wall along these levels. The new wall alignment allows for an opening with planter bed to be included in the southwest corner of the level 3 podium, which will further soften the appears to Jephson Street and the driveway entry to the adjoining property.

The height of the planter bed which sits on top of the podium along the southern boundary has also been reduced in height. This planter bed will provide for cascading plants which will extend down the southern podium wall and ensure a softening of the built form. As outlined, due to the proposed setback, these will not overhang the property boundary and can be maintained from site.

Podium level floor plans have also been updated to provide detail of the building separation to the neighbouring building to the south. The adjacent building has only unit entries and an access walkway facing northwards.

The adjacent building has two levels of residential space with three units per level. The eastern and western units on each level have balconies which face east and west and will

not be impacted by the proposed podium. The central units on each level do not have designated areas of private open space. The building is also substantially separated from the shared boundary. The separation distance is demonstrated on the plans provided, with 5.46m of separation to the edge of the access walkway and 6.52m to the wall. This separation will further ensure that the proposed building does not impose upon the adjacent building, and the building can also maintain access to natural light and breezes.

- b. Provide amended shadow diagrams comparing a compliant built form and the proposed height/setbacks at solstice and equinox (10am, 12pm, 2pm). Ensure the shadow diagrams apply accurate north orientation. Utilise different colours/shading for the tower and podium components.*

Updated shadow diagrams have also been provided as requested. The diagrams demonstrate that the shadow cast by the proposed building is similar to the shadow that would be cast by a building of compliant height. In some instances, there is no discernible difference in the two potential shadowing outcomes.

During most periods, the main shadowing impacts will be along Sylvan Road and Jephson Street and therefore will not impact upon the amenity of adjoining properties. In periods where shadows are directed further southwards, particular in June, the diagrams show that the limited dimensions of the proposed tower ensures a fast moving shadow that does not impact a particular adjoining property for an extended period. On this basis, the proposed design ensures an appropriate consideration of the amenity of adjoining properties.

### **Isolation of Adjoining Site**

- 2. The adjoining site at 58-68 Sylvan Road being approximately 515sqm will be isolated by the proposed development. As it does not meet the minimum area required for a multiple dwelling use, further information is required to demonstrate that the proposal does not unduly prejudice the development of the adjoining site.*
  - a. Acknowledging the several performance outcomes being sought, consider including the adjoining lot in the application.*
  - b. Where inclusion of the additional lot is not feasible, demonstrate the proposed development does not prejudice future development. Provide:*
    - i. Potential developable area (height, setbacks etc) on the adjoining lot.*
    - ii. Interface sections demonstrating how privacy and amenity impacts are managed.*

The applicant made attempts as part of the initial investigation process to purchase the adjoining site. This was not commercially viable.

An anticipated built form outcome, for the maximum possible yield of residential development, has been discussed informally with Council. It is not considered reasonable for Council to require the applicant to provide plans which demonstrate the built form outcome achievable on this site. This would require the architect to input their intellectual property into a forum which could be used by the adjoining owner at no cost. An indicative building

footprint has been previously shown to Council in the originally lodged plans and this should be sufficient in confirming that the site is developable.

The adjoining site is able to develop in isolation of the subject proposal, with the yield achievable likely dictated by the number of refuse bins able to be collected from the street frontage. The site is of dimensions which would not allow for on-site refuse collection and therefore street collection of bins is required. The planning scheme only permits a maximum of ten units to be serviced from the street and this would therefore be the maximum hypothetical yield achievable. A building with one unit per level could then be built above and this would be dependent on the amount of car parking provided.

The proposed podium is designed in an attractive manner with feature concrete panels. It is also only built to boundary up to podium level 2, and is otherwise setback 500mm from the eastern boundary with a small planter along the boundary. This design outcome ensures a positive amenity is maintained to the adjoining property.

While the proposed podium car parking levels will require mechanical ventilation, it is confirmed that this will be directed to the street and there will be no openings to the adjoining properties. It is concluded that the adjoining property remains developable and can achieve an appropriate residential amenity.

### **Encroachment into Road Dedication Area**

3. *The revised development proposes architectural elements, building services and structural walls within the area to be dedicated as road. Council does not support encroachment of the development in the road reserve above ground, and where below ground, further details are required to ensure there is not impact on the intended function of the verge.*
  - a. *Provide amended plans demonstrating the development is completely contained within the subject site.*
  - b. *Encroachment of the basement level into the road reserve may be supported where it resolves other non-compliances. Any encroachment below ground must be supported by a volumetric easement.*

All encroachments into the road dedication have been removed as demonstrated on the amended plans prepared by HAL Architects.

### **Landscaping**

4. *It is acknowledged that the site is constrained by road widening requirements, limiting the provision of in-ground deep soil planting and large canopy trees. The proposal therefore relies on containerised planting at ground and podium levels, including trellis planting.*

*Council is not satisfied that sufficient information has not been provided to demonstrate that the proposed planter sizes, species selection, and long-term*

*maintenance arrangements are appropriate or feasible. In addition, inconsistencies between the landscape concept and architectural plans have been identified. The following further information is required:*

- a. An increased planter width at the mezzanine level to accommodate effective screening vegetation along the full length of the southern and eastern side boundaries.*
- b. Details of planter depths and amended plans resolving inconsistencies between the landscape and architectural drawings. It is noted the perspectives and elevations illustrate trellis planting which is not included in the landscape concept plan.*
- c. Details of access and maintenance arrangements for the containerised planters along the western side boundary at podium levels 2 and 3, having regard to the proposed planter width of 540mm.*
- d. A schedule of proposed planting species for all containerised planters at podium levels 2 and 3. Low to medium height shrub planting is recommended for these areas.*

Please find attached an amended Landscape Concept Plan prepared by HAL in response to the above.

### **Access, Servicing and Refuse**

- 5. It is unclear if the proposed refuse collection vehicle (RCV) movements can be undertaken safely and in compliance with the Transport, access, parking and servicing (TAPS) code.*

*The submitted swept path information demonstrates that the RCV reversing manoeuvre does not consistently achieve the minimum 0.5m clearance to the north-eastern corner of the lift lobby room. This manoeuvre also occurs over the access ramp; however, no information has been provided to demonstrate compliance with minimum vertical clearance requirements.*

*In addition, Council's design planning for the Sylvan Road corridor has progressed and indicates that future road works are likely to result in the stop line shifting approximately 1.5m to 2.0m east, the removal of the existing on-road bicycle lane along the Sylvan Road frontage, and the lateral realignment of the westbound traffic lanes. These changes may require minor amendments to the driveway exit splay to ensure that service vehicles and refuse collection vehicles can continue to safely exit the site. The following additional information is required:*

- a. Revised ground-level plans and RPEQ-certified swept path analysis demonstrating that all RCV manoeuvres within the site maintain a minimum 0.5m clearance to all buildings and obstructions, and that adequate vertical clearance is achieved where vehicle movements occur over the access ramp, in accordance with PO18 and PO19 of the TAPS code.*

The Ground Level plan has been amended to maintain a 0.5m clearance to all obstructions and adequate vertical clearance is achieved.

- b. A separate RPEQ-certified swept path analysis that considers the future Sylvan Road corridor layout and confirms that the driveway crossover, including the exit splay, supports the safe egress of service vehicles and refuse collection vehicles under the future road configuration, in accordance with PO18 and PO19 of the TAPS code.*

It has been confirmed with Council that no additional swept path analysis is required.

Further information has also been provided by Council regarding the future intersection and roadway layout. We have had this reviewed by our traffic engineer and it is confirmed that changes will only benefit our proposed manoeuvring arrangement. Under the revised scenario, an RCV will stand more parallel to the kerb with reduced prospect of overhanging.

- 6. The main bin storage room appears to share the bicycle parking access and is not provided with a separate access which is of sufficient width to allow for the movement of bins. A separate stand-alone access should be provided, and the bin store room is to be enclosed to reduce impacts on residents accessing the bike parking room.*
  - a. Submit revised plans showing the door to the main bin store room widened to allow for bins to be transported to the rear of the RCV, without use of the access to the bicycle room, to maintain amenity for bicycle users and avoid conflicts; in accordance with PO8 of the Infrastructure design code.*

*Note: The small bin room may use the bicycle access corridor for the circulation rotation of bins to the main bin room.*

Amended plans prepared by HAL Architects show an amended access point to the bin room which is no longer shared with the bicycle parking access hallway.

This letter represents a full response to Council's Further Advice.

Should you require any further clarification or additional information please do not hesitate in contacting the undersigned.

**Yours faithfully,  
Plan A Town Planning Pty Ltd**



**Matt Geyle  
Director**