

Response to Submissions

A006954430

355 Coronation Drive, Auchenflower

M E W I N G
P L A N N I N G
C O N S U L T A N T S

Overview

Mewing Planning Consultants has reviewed Brisbane City Council's public scrutiny file (Development i) and understands from our review that 366 properly made submissions were received in relation to the development application. Of the submissions properly made, 40 were in support of the application and 326 were in opposition (this should be confirmed by Council from their records).

Within the properly made submissions which opposed the application, many were of a proforma style, identifying the same or very consistent items across each individual submission. Three (3) main proforma styles were identified. A summary of the number of submissions made in accordance with each style is provided below:

- Proforma style 1 (typically from residents or visitors of the Linear Apartments): 63 submissions
- Proforma style 2 (typically addressing built form, amenity and planning needs): 156 submissions
- Proforma style 3 (longer form submission typically 9 pages): 17 submissions

The proforma submissions typically addressed the same or very similar items. As such, and on behalf of the Applicant, we provide a summary of the key themes (tabulated below) raised within the submissions and a corresponding response. These themes are a summary of those identified by Mewing Planning Consultants, and therefore does not address each precise aspect in the submissions but instead addresses key themes raised across the spread of submissions.

It should be noted that 17 submissions received were not 'properly made' as they were submitted prior to the public notification period commencing on 17th April 2026 or after it concluded on 11th May 2026. Notwithstanding, these submissions were reviewed and the key themes raised have been addressed in the below table below for completeness.

Key Themes: Submissions in Support

In addition to the key themes outlined within the table below, it is noted that the key themes outlined within the submissions of support of the development are as follows:

- The site provides for high density development as anticipated by the Planning Scheme on a landmark site, which is intended to provide citywide prominence.
- The project makes a meaningful contribution to housing supply in a well located part of the inner city.
- The proposal provides for dwelling diversity supporting a range of future tenants in a location that is highly accessible with public transport in direct proximity of the site.
- The proposal provides a genuine subtropical response featuring curved balcony edges, layered facades, and provides for urban greening.

- The proposed publicly accessible open space provides a tangible benefit to the community at the corner of Coronation Drive and Lang Parade.
- Increased residential density is seen as a positive contribution for local small businesses, providing a sustained increase in foot traffic for cafes and retailers along Park Road and Coronation Drive.
- The proposal provides for a sustainable urban form by concentrating density in a well-serviced inner city location. This approach makes efficient use of existing infrastructure and helps reduce the pressure on urban sprawl.

Key Themes: Submission in Opposition

The below provides the Applicant's view in respect to each theme raised in the submissions objecting to the proposed development. In several instances, the response refers to the Town Planning Report and the technical reports submitted with the original application, to assist in guiding this summary response to the more detailed content that forms the 'common material' for the development application.

Submission Matter	Response
<p>Building Height</p> <p><i>'The building's excessive height is not of a scale and form that is consistent with form and amenity of the neighbourhood will seriously affect the views of the Brisbane River from Founda Gardens, Linear, Coronation Towers and Sylvan Grove, and of Mount Coot-tha from many properties in West End.'</i></p> <p><i>'The applicant attempts to justify this extreme height by claiming the building acts a transition from Milton... The opposite side of Land Parade is zoned MU1 and is subject to a strict 5-storey limit...'</i></p> <p><i>'Self-evidently, while there may be greater height existing,</i></p>	<p>The site at 355 Coronation Drive, Auchenflower is a strategically located site within Brisbane's inner city and presents a range of particular site and contextual characteristics that create an opportunity for a high-quality residential-led development outcome. The proposed built form has been resolved by the project team having regard to the local context and site-based characteristics, together with the relevant provisions of the City Plan (notably including the site's inclusion as a Landmark Site under the Toowong-Auchenflower Neighbourhood Plan¹) and relevant matters.</p> <p>The proposed development represents a high-quality residential development that will contribute to the ongoing transformation of the broader inner-city locality. The proposed building height is appropriate for the reasons expressed below:</p> <p>Evolving Policy Context:</p> <p>As outlined within the subsequent sections detailed sections below of this Submission Response (page 16), the policy context of Brisbane and the inner-city has undergone a dramatic shift within the last three (3) years, with several strategic planning policies, including ShapingSEQ South East Queensland Regional Plan 2023, clearly demonstrating that well-located inner city areas will be required to support a significant amount of density to ensure a sustainable supply of housing across Brisbane. This shift in policy setting is observed through the release of several Council policy documents including Brisbane's Sustainable Growth Strategy and Brisbane's Inner City Strategy, in which the site is identified as a 'inner city growth area' and 'key inner city precinct'. The identification of the site and surrounding area as an 'inner city growth area' and 'inner city precinct' indicates that Council is anticipating the site and surrounding locality to support increased densities in the lead up to the Brisbane 2032 Olympic and Paralympic Games.</p> <p>The broader Auchenflower locality is guided by a number of Council's strategic strategies (detailed above), which encourages the urban consolidation and redevelopment of existing urban areas to support housing supply and the efficient use of physical and social infrastructure in well-located and highly amenable parts of Brisbane. The proposal will provide housing opportunities to cater for population growth in a well-connected and serviced locality and provides for a residential-led, inner-city development that increases housing diversity.</p> <p>Therefore, it is clear the proposal aligns with the emerging policy context being pursued by Brisbane City Council pursuant to the abovementioned strategic planning documents (and further detailed within the subsequent sections of this Submission Response – please refer to page 16). These documents have been in place since early 2023 when the growth strategy was released, with Brisbane City Council pursuing this position continually since its publication. While Auchenflower is not subject to a specific planning scheme amendment to date, Council clearly intends to enable higher density development in well located inner city areas therefore demonstrating the proposal aligns with Council's intention and public policy position.</p> <p>Site location, accessibility and servicing:</p>

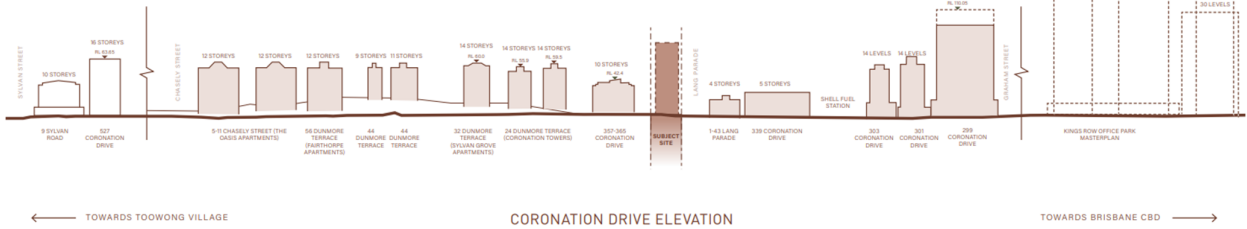
¹ Refer to **Page 10** of this Submission Response for further detail in relation to the site being identified as a 'landmark site'.

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<p><i>proposed and approved for other areas, the streetscape and character of the surrounding Auchenflower area is currently characterised by buildings of lower heights than the proposed development as seen in Figure 4.... Figure 3 misrepresents the true streetscape and character of the surrounding land by ignoring the smaller height built forms of the area...'</i></p> <p><i>'...[the] streetscape experienced when entering the Dunmore precinct along Coronation Drive, range in height between 5 and 14 storeys.'</i></p>	<p>The site is located within the inner-city suburb of Auchenflower and is located approximately 2.3km (or 1.9km as the crow flies) south-west of the Brisbane Central Business District. The site is well-located, with access to key public transport services, established activity centres, local parks and health care services. Therefore, the proposal provides high density housing in proximity to employment, educational facilities, open space and recreation, high frequency public transport and entertainment venues. The site is an ideal and convenient location for high density residential development, particularly noting increasing pressure on housing supply and cost of living.</p> <p>Furthermore (and as presented within Section 2.2 of the Town Planning Assessment), the site is identified in close proximity to key employment nodes (including the City Centre and Toowong Village), educational facilities, local parks and mixed use centres. The site represents a high amenity location, which is reinforced by the Overall Outcomes for the Toowong – Auchenflower Neighbourhood Plan which identifies <i>"Higher density development is located in areas with high amenity, close to major open space or the Brisbane River, or in centres and around major public transport to promote a legible centre structure and support transit oriented development"</i>.²</p> <p>Alignment with Strategic Framework of City Plan:</p> <p>The strategic policy direction set by the regional plan and other key policy documents are effectively captured by the Strategic Framework of the City Plan and the key themes. The key themes most relevant to the proposal include Theme 2: Brisbane's outstanding lifestyle and Theme 5: Brisbane's CityShape. With these key themes in mind the Applicant notes the following:</p> <ul style="list-style-type: none"> • The proposal provides for housing choice and diversity in proximity to the CBD (1.9km as the crow flies), providing accessibility to places or work, retail and entertainment (Strategic Outcomes f-g Theme 2); • The site represents an infill location ensuring that major new housing opportunities are provided in existing urban areas , ensuring easy access to employment, goods, services, community facilities and protects the city's green edge (Strategic Outcome h, Theme 2); • The proposal provides strong urban legibility by locating taller buildings closer to the principal centre (CBD) enabling a sloping skyline from the City Centre down and away from the CBD (Specific Outcome 1, L1.2 – Theme 2); • The proposal does not impede on any identified view corridors or iconic vistas pursuant to the Neighbourhood Plan or other relevant overlays (Specific Outcome 6, L6.1-L6.3 – Theme 2); • The development proposes a high density residential development within the Growth Node along the South-west Rail Transport Corridor and between the Toowong Major Centre and the City Centre. Therefore the proposal locates a high density residential development appropriately in relation to key transport infrastructure, pursuant to Theme 2, Element 2.1 - Land Use Strategy L12, Theme 2, Element 2.1 – Specific Outcome SO15, and Theme 2, Element 2.2 - Land Use Strategy L1, Theme 5, Element 5.3 – Land Use Strategy L5.3, Theme 5, Element 5.3 – Land Use Strategy L4; • The proposed development's location in close proximity to public transport networks will encourage a walkable neighbourhood and reduced vehicle-based trips (Theme 5, Element 5.8 – Land Use Strategy 2.1);

² Overall Outcome OO3(f) of the Toowong – Auchenflower Neighbourhood Plan Code

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	<ul style="list-style-type: none"> The proposed development represents a high quality architectural design and form that will enhance the character of Auchenflower and the creation of high quality, contemporary and well-articulated and subtropical streetscape (Theme 2, Element 2.1 – Land Use Strategy 13); and The built form, siting and design of the development promotes a subtropical urban design and living outcome for the occupants of the building (Theme 2, Element 2.1 – Land Use Strategy 7). <p>Therefore, as outlined in the original town planning report and above, the proposal clearly aligns with the policy direction set by the Strategic Framework of the City Plan.</p> <p>Alignment with overall outcomes of the High Density Residential zone code:</p> <p>The proposal complies with the relevant overall outcomes of the High Density Residential zone code as previously addressed within the submitted development application material and town planning assessment. Please refer to the detailed code assessment which was undertaken against the High Density Residential Zone Code (provided within Appendix A of the original application material) for further detail.</p> <p>Consistency with the surrounding area and streetscape:</p> <p>It acknowledged that concerns were raised by submitters in relation to the consistency of the proposal with the surrounding area and streetscape of Coronation Drive and Dunmore Terrace, noting that the proposal <i>‘...is not aligned with and is unquestionably inconsistent with community expectations about the number of storeys to be built ...in the Dunmore residential precinct...’</i></p> <ul style="list-style-type: none"> As outlined above, the policy context for Auchenflower and the inner-city area of Brisbane as a whole is undergoing significant shifts, due to the ongoing need to address housing supply shortages. Notwithstanding, the proposal provides a clear transition from the highest density area within the city being the CBD in the east (approximately 1.9km east) to the Toowong Major Centre to the southwest (approximately 1.4km), which currently supports development up to 25 storeys. The transition in height from the CBD down to the Toowong Major Centre along Coronation Drive is evidenced by the figures provided in the original town planning report, reproduced below for ease of reference (Figure 1 and Figure 2).

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	 <p data-bbox="604 987 1724 1011">Figure 1: Building Height Context (as shown in original town planning report Figure 36) (Source: Joe Adsett Architects, 2026)</p>

Submission Matter	Response
	 <p data-bbox="569 662 1751 688">Figure 2: Building Height Context (originally provided as Figure 34 in the town planning report) (Source: Joe Adsett Architects, 2026)</p>
	<p data-bbox="451 850 1869 1029">As demonstrated above, it is evident that the proposal fits within the context of Coronation Drive and transitions in height from the CBD down to the Toowong Major Centre. Section 2.3.1 of the Town Planning Report and the above figures demonstrate that the relevant section of Coronation Drive is characterised by a variety of built form outcomes and building heights, which extend up to 37 storeys to the north-east (i.e. towards the Brisbane CBD). In addition, the building height has a clear relationship with the built form of the Dunmore Terrace precinct, per the diagram above given the changes in topography and with built forms sitting atop elevated parts of the precinct (whereas this site is on lower ground). The following key aspects are also noted below:</p> <ul data-bbox="451 1042 1869 1367" style="list-style-type: none"> • Various submissions suggest that the site context is only relevant to the extent of the Dunmore Terrace precinct boundary, rather than the streetscape in its entirety. The built form character of a streetscape is not limited to an arbitrary precinct boundary; the entire streetscape context must be considered to ensure the full character of an area is appropriately considered and understood. • Excluding the established building heights along the Coronation Drive to north-east of the site, treats the site in isolation of the surrounding context and is therefore an inappropriate assessment of the streetscape character. • It is relevant to note that Dunmore Terrace is subject to a significant slope (as presented within Figure 2), with the buildings located to the north of the site being benefitted by a Natural Ground Level (NGL) higher than the NGL of the site, meaning the proposal sits on lower ground than the buildings behind it along Dunmore Terrace (Figure 2 above and Figure 3 below). • An additional section has been prepared and provided below within Figure 4, which demonstrates the development potential achievable under the Neighbourhood Plan via a code assessable application pathway (noting that 15 storeys can be achieved along

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Coronation Drive where meeting the relevant site criteria pursuant to the Neighbourhood Plan on sites with a higher NGL than the site). These code assessable built forms would sit at a comparable level to the proposal, due to the difference in NGL.



Figure 3: Oblique view of 355 Coronation Drive and Dunmore Terrace to north (site identified in blue) (Source: Nearnap, 2026)

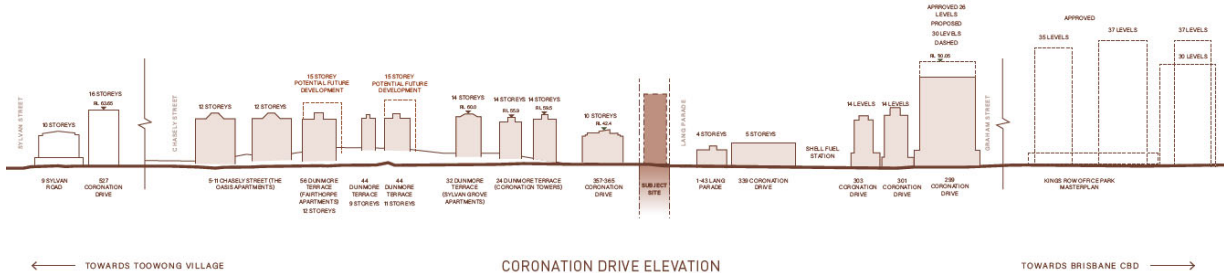


Figure 4: Section demonstrating code assessable development outcome at top of Dunmore Terrace hill (Source: Joe Adsett Architects, 2026)

- As articulated by the Neighbourhood Plan, sites which front Coronation Drive and other select roads in the locality are anticipated and encouraged to support additional building height, than sites which front lower order roads (Table 7.2.20.3.3.B of the Toowong – Auchenflower Neighbourhood Plan). Accordingly, it is relevant to note that the Dunmore Residential Precinct intends for taller building on Coronation Drive (i.e. 15 storeys).

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	<p>Thus, the proposal responds to the nature of the streetscape, with the highest density located to the north-east towards the CBD and heights transitioning down to the Toowong Major centre (which supports up to 25 storeys in height) while moving away from the Brisbane CBD. The proposed building height outcome represents an appropriate building height having regard to the site's context and location within Auchenflower and recently approved and constructed developments identified within the surrounding locality, as presented within Section 2.3.1 of the original Town Planning Assessment.</p> <hr/> <p>Significant Views:</p> <p>Various submissions identified that the community expectations set by the Neighbourhood Plan include the protection of views to Mt Cootha or the Brisbane River. Significant (public) views are regulated within the City Plan 2014, through the explicit identification (typically within Neighbourhood Plans).</p> <p>The protection of views to Mt Cootha or the Brisbane River are provided within Acceptable Outcome 1.6 (AO1.6) of the Toowong – Auchenflower Neighbourhood Plan which is reproduced below for clarity:</p> <p><i>'AO1.6: Development has building siting, configuration and design which retains the significant views of Mt Coot-tha or the Brisbane River as identified in Figure b.'</i></p> <p><i>[emphasis added]</i></p> <p>Having regard to Figure B – Public Realm of the Toowong -Auchenflower Neighbourhood Plan, no significant views or vistas are impacted by the proposal, as clearly expressed within the application material submitted to date. An extract of Figure B has been provided below for ease of reference. Please refer to Figure 5.</p>

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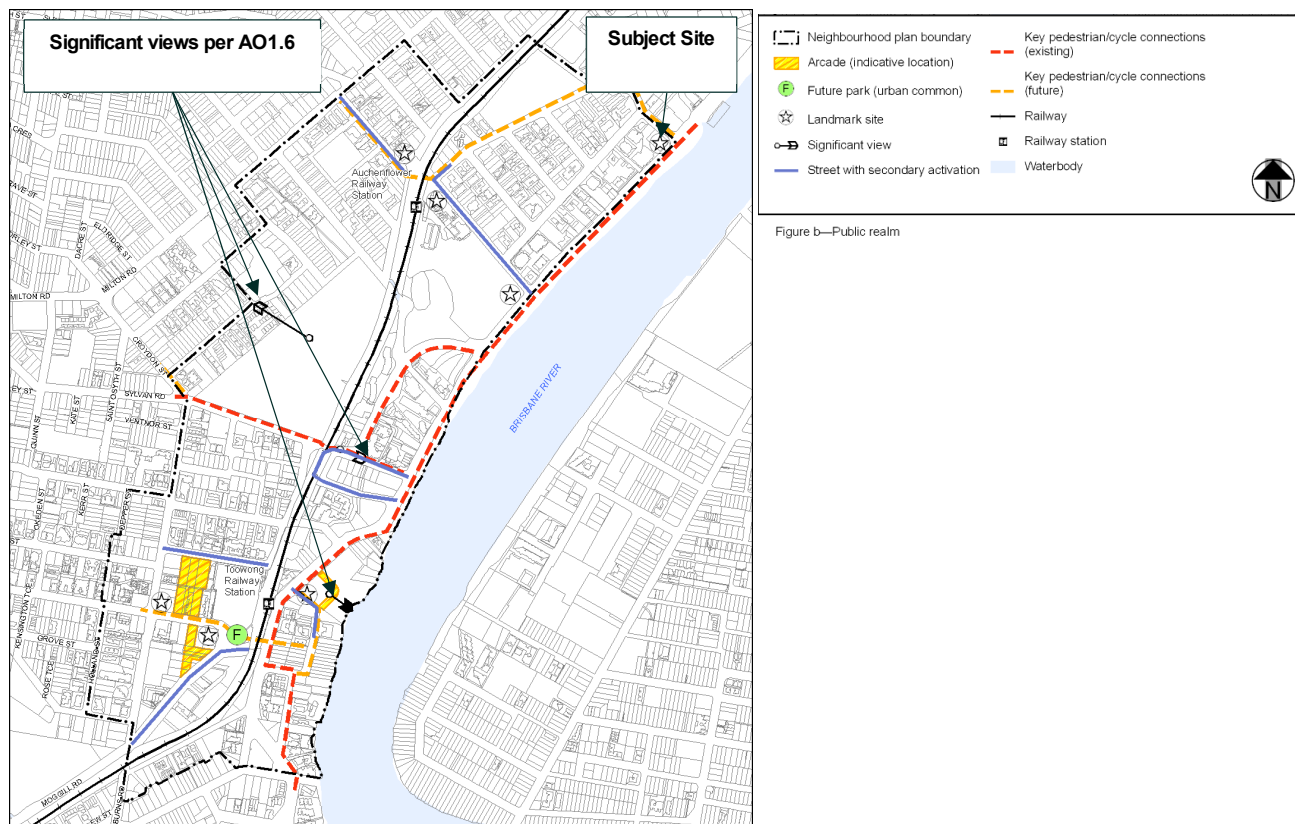


Figure b—Public realm

Figure 5: Extracted Figure B from Neighbourhood Plan with annotations (Source: Brisbane City Council, 2026)

Submission Matter	Response
<p>Landmark site</p> <p><i>'...while the site may hold a "landmark" designation under PO6, this requires architectural excellence and a tangible contribution to the public good.'</i></p> <p><i>'...the applicant misuses the site's "landmark" designation under PO6. A landmark requires architectural excellence and a genuine contribution to the public realm, not merely an excuse for unlimited height and excessive density... Instead of giving back to the community, the ground level is effectively privatised as an external lobby. Furthermore, the architectural design relies heavily on repetitive horizontal layers rather than the distinctive vertical elements required for tall buildings.'</i></p>	<p>As identified by the Toowong – Auchenflower Neighbourhood Plan, the site is identified within Figure B- Public Realm as a 'Landmark site'.</p> <p>The definition for a 'Landmark site' pursuant to the City Plan (Schedule 1.2) is provided below (in <i>italics</i>):</p> <p><i>'A site identified in a neighbourhood plan to accommodate buildings or developments that attain citywide prominence through a combination of notable architectural excellence, siting and location.'</i></p> <p>The proposal aligns with this definition for the following reasons:</p> <ul style="list-style-type: none"> • The site is identified as a landmark site pursuant to Figure B of the neighbourhood plan; • The proposal is of a scale and value that can readily achieve 'citywide prominence' through: <ul style="list-style-type: none"> ○ the high-quality architectural features (which is broad in its remit and includes form and expression), as clearly described within the application material, architectural plans and design report; ○ the proposed siting and location, being a highly accessible site, within close proximity of the CBD and Toowong Major Centre. <p>As a consequence of the site's inclusion as a landmark site, the project vision is to harness the essence of Auchenflower, service the strategic active and public transport position, provide a meaningful public realm outcome at the corner of Lang Parade and Coronation Drive and provide a landmark built form outcome and subtropical exemplar that is visible and celebrated for its local Brisbane response. The development provides a landmark building, consistent with the planning intentions for the site. The proposed building height of 23 storeys is generally in keeping with the existing, emerging and anticipated building height outcomes for the immediate area and is cognisant of the planning driver for distinction through a 'landmark' design response.</p> <p>A form and design that is suppressed would not effect the landmark outcome. It needs to be an appreciable outcome on approach to the precinct from the north in particular (being the northern corner of the precinct), and that must be observed in the context of the existing and emerging cityscape that has been discussed above.</p> <p>Having regard to the privatisation on ground level raised within submissions, it is noted that the scope of the proposal is contained wholly within private freehold land. To ensure the proposal provides streetscape activation and contributes to the public realm along Coronation Drive, publicly accessible, privately owned open space has been provided on site. The ground floor outcome along Coronation Drive and Lang Parade is designed to have a prominent visual reference and contribution to the city's public realm by reinforcing a sense of arrival to the neighbourhood plan area. The proposed development notably provides a visible presence and interaction with the street frontages, providing a landscaped publicly accessible space / outdoor garden that facilitates a pleasant pedestrian experience through Lang Parade and at the corner of the site.</p> <p>This item was addressed in detail within the response to information request documentation. Please refer to the Information Request Response letter prepared by Mewing Planning Consultants for further detail.</p>

Submission Matter	Response
<p>Overshadowing, Privacy and Amenity</p> <p><i>'Given the scale and height of the tower relative to nearby buildings, there is concern regarding: Overshadowing impacts on neighbouring residential properties. Increased visual bulk when viewed from surrounding streets and residences. Reduced sense of openness within the local area. Potential overlooking and privacy impacts into surrounding residential buildings.'</i></p>	<ul style="list-style-type: none"> • The proposal does not cause a significant and undue adverse amenity impact to adjoining development. The strategically designed and curved setbacks of the building reduce overshadowing on the neighbouring developments. The shadow diagrams enclosed within the originally submitted Architectural Package, indicate that the proposal facilitates fast-moving shadows that will not adversely impact the amenity of adjoining developments / dwellings. Adjoining developments will maintain good access to sunlight through the day, and therefore the proposed built form will not adversely impact the adjoining residential developments. • The application material demonstrates that the proposal provides fast moving and slender shadows. Refer to the shadow diagrams (included within the original Architectural Documentation) for further information. It is noted that the longest shadows fall across the road reserve and Brisbane River. The proposal provides a high level of amenity for surrounding residents, noting the generous building separation. • The design of the building has been progressed to provide a well-managed interface with adjoining multiple dwellings, having regard to the site-specific characteristics of the adjoining buildings. The building design has given particular consideration to the adjoining ten (10) storey multiple dwelling to the south-west and eight (8) storey multiple dwelling development to the north-west. This is achieved by providing a varied setback for the tower component and achieves an appropriate building separation, comprising 16.5m – 19.7m to the north-western development and 19.5m – 22.3m to the south-west which is suitable for maintaining privacy and access to natural lighting, sunlight and breezes. The proposed development notably provides separation distances that protect the amenity and provide for private open spaces on upper levels that do not require screening for privacy (pursuant to the Multiple Dwelling Code). • The proposed development comprises a tower form consistent with the planning intentions, with the tower site cover of 59% appropriate to its context and availing setbacks that are considerate of the site's interfaces (dual frontage), views and neighbours. The proposed development is designed to avoid a significant and undue adverse amenity impact on adjoining developments and provides suitable building setbacks and tower site cover as detailed within Section 5.1.2 of this Town Planning Assessment. • The internal layout of the proposed development maximises the liveability of the apartments, the units have been designed to facilitate cross-ventilation and good access to natural daylight in accordance with subtropical design principles. As demonstrated within the Architectural Plans, primary living and balcony areas are oriented and angled to the north-east / south-east (i.e. Brisbane River / Brisbane CBD) to assist in maximising privacy and amenity to the existing adjacent developments. • The presence of the built form in the proposed location provides an appropriate design consistent with the land use and built form intentions anticipated within the High Density Residential zone, in such close proximity to the CBD. The site represents a currently underutilised site within the High-Density Residential Zone in an inner-city location capable for supporting a greater density outcome, which is supported by the City Plan and the Brisbane City Council Sustainable Growth Management Strategy (see Page 16 of the Submission summary for further detail). • The proposal represents a densification of the site compared to the current built form outcome, as clearly intended and anticipated by the Zone Code, Strategic Framework, <i>Brisbane's Sustainable Growth Strategy</i>, <i>Brisbane's Inner City Strategy</i> and <i>ShapingSEQ South East Queensland Regional Plan 2023</i> (see Page 16 of the Submission summary for further detail). The site is located on a key road (Coronation Drive), identified as a landmark site, zoned for high density residential land uses, in direct proximity to the CBD and

Submission Matter	Response
	<p>Principal Centre zone (approximately 2km), these characteristics indicate to residents that the area is set to support high density outcomes.</p> <ul style="list-style-type: none"> The proposed design, which includes highly articulated balconies, visual interest through a varied material palette and generous landscaping throughout the built form provides a high quality architectural outcome. The outcome achieved by the design ensures amenity for residents is prioritised, while still achieving a high density residential outcome on site. It is noted that the architectural components of the development, including curved balconies (primarily oriented to the road frontages / Brisbane River / Brisbane CBD), a varied material palette and high levels of articulation through the built form create visual interest and reduce the perception of building mass to the street. The curvature of the proposed development softens the visual impact from the streetscape and adjoining buildings, particularly compared to a number of existing and approved residential and commercial buildings established within the surrounding locality (Figure 6). <div data-bbox="472 646 1837 1323"> </div>

Submission Matter	Response
	<p>Figure 6: Comparison of proposal and surrounding development (Source: Joe Adsett, 2026)</p>
<p>Need and relevant matters</p> <p><i>'It is unquestionable that the Proposed Development is a serious overdevelopment of the Land in circumstances where there are no relevant matters advanced which are:</i></p> <p><i>(a) meaningful. The suggestion that the "proposed development is responsive to the established and existing local context" is meaningless.</i></p> <p><i>(b) matters of serious public importance; and</i></p> <p><i>(c) correct.'</i></p>	<p>The originally submitted Town Planning Report identified numerous relevant matters which support the proposed development (refer to Section 5.2 of the originally submitted Town Planning Report). A selection of these key relevant matters include (but are not limited to) the following:</p> <ul style="list-style-type: none"> • The proposal responds to Council's Policy Documents (notably including <i>Brisbane's Sustainable Growth Strategy</i> and <i>Brisbane City Council's Inner City Strategy</i>). The proposal will provide housing opportunities to cater for population growth in a well-connected and serviced locality and provide for a residential, inner-city development that increases housing diversity in a well-connected locality. Please refer to Page 16 of the Submission Response providing further detail with respect to Council's Policy Documents. • The proposal will provide housing opportunities to cater for population growth in a well-connected and serviced locality and provide for a residential, inner-city development that increases housing diversity in a well-connected locality. The proposal complies with the South East Queensland Regional Plan. Shaping SEQ 2023 notably recognises the current housing supply issues faced in South East Queensland and identifies that a target of 210,800 additional homes are to be provided within the Brisbane Local Government Area from 2021 – 2046. The proposed development will contribute to the supply of housing within Brisbane. Furthermore, the proposal responds to the Brisbane Vision 2031 dwelling targets, which notably seeks to accommodate 156,000 new dwellings to meet anticipated growth of which 138,000 will be infill dwellings. • Therefore, given the ongoing supply issues and need for well-located, dense residential development, the proposal is supported by a clear planning, economic and community need for housing. Providing well located, high density housing is a significant matter for residents of Brisbane. • It is evident that housing must be provided in adequate quantities near places of work and amenity, therefore, providing high density housing such as the proposal within such close proximity to the CBD (approximately 2km) is logical, necessary and of utmost importance to ensure all members of the public can access housing in Brisbane.
<p>Flood mitigation</p> <p><i>'The proposal creates unacceptable flood risk. The developer has refused the Council's requirement for a basement entry at RL 6.3m AHD and has instead proposed an</i></p>	<p>As clearly demonstrated by the Revised Flood Risk and Flood Emergency Management Plan prepared by Inertia Engineering and approved by a Registered Professional Engineering of Queensland (RPEQ), the proposed development complies with PO11 of the Flood Overlay Code. Additionally, the Revised Flood Risk and Flood Emergency Management Plan demonstrates that all residents and visitors can safely evacuate onto Coronation Drive from the Lobby as it remains flood free in the 1% AEP flood event.</p> <p>Please refer to the Revised Flood Risk and Flood Emergency Management Plan prepared by Inertia Engineering (lodged in response to Council's Information Request) for additional details.</p>

Submission Matter	Response
<p><i>entry at RL 5.7m AHD. Reliance on a Flood Emergency Management Plan and shelter-in-place on the first floor is an inadequate performance solution for this site given the flood hazard.'</i></p>	
<p>Wind mitigation</p> <p><i>'Reliance on a qualitative visual inspection instead of empirical data is an inadequate performance solution to determine the likely wind speeds at the ground plane, which poses a potential impact on public safety and amenity.'</i></p>	<p>As demonstrated by the Pedestrian Wind Environment Assessment prepared by WindTech Consultants (provided as part of the Information Request Response Package), the proposal complies with the relevant assessment benchmarks of the Brisbane City Plan 2014 (relevantly PO15 of the Multiple Dwelling Code).</p> <p>The results of the Wind Assessment indicate that the development has incorporated numerous design features, particularly with respect to the proposed landscape outcome and tree canopy provision delivered on the ground plane, which will have a positive impact on the wind conditions of trafficable areas for pedestrian and building occupants.</p> <p>Refer to the Wind Assessment provided as part of the Information Request Response Package for additional details.</p>
<p>Construction management and impacts</p> <p><i>"This development will substantially increase the traffic along Dunmore Terrace both during and after construction"</i></p>	<p>The Applicant is conscious of managing construction aspects to every reasonable degree on local residents.</p> <p>A construction management plan can be included as a requirement within a reasonable and relevant condition. This Plan will outline the approach to pedestrian management, mitigation strategies for associated construction impacts including noise and dust, traffic provision for loading and unloading of materials, traffic management and other related matters. We understand that the Construction Management Plan will need to be assessed and approved by Council prior to any works occurring on the site (pursuant to Council's standard guidelines).</p>

Submission Matter	Response
<p>Airport environs and flight paths</p> <p><i>"Local residents should be advised of, and given the opportunity to object to, any proposed changes to flight paths of commercial and/or emergency services aircraft as a result of this application, prior to its approval"</i></p>	<p>The proposed development will not impact upon the Airport Environs Overlay, as demonstrated by the application material submitted to date (and compliance demonstrated pursuant to the Airport Environs Overlay Code).</p>
<p>Transport, access and parking</p> <p><i>"the proposal would introduce additional residential traffic movements into an already constrained network"</i></p>	<p>The applicant material has clearly addressed the relevant traffic and car parking matters related to the proposed development. Please refer to the Traffic Engineering Response Letter, prepared by Colliers (included within the response to information request) for additional details.</p>
<p>Infrastructure matters</p> <p><i>"public transport routes in this corridor are already operating at capacity"</i></p> <p><i>"can place disproportionate pressure on the transport network, public space or"</i></p>	<p>The proposal is for an anticipated use within the inner city, where a vast majority of the City's high density development is anticipated to occur. As clearly demonstrated by the various specialist reporting provided by the application material, the proposal does not unnecessarily impact on key infrastructure networks.</p> <p>With respect to infrastructure demand, the Engineering Assessment, prepared by Morgan Consulting Engineers confirms that the site can be adequately serviced by the existing infrastructure network without the need for any upgrades to infrastructure. The Traffic Assessment, prepared by Colliers, confirms that the projected traffic generation of the proposed development will not significantly impact the safety or operation of the surrounding road network. Please refer to the Traffic Impact Assessment and Civil Engineering Assessment for additional details.</p>

Submission Matter	Response
<i>community facilities in particular"</i>	

Strategic Context and Policies – Housing Supply and Affordability

At the outset, it is important to acknowledge that Brisbane is currently undergoing a significant policy shift due to the ongoing pressures of housing supply and affordability. Brisbane City Council (**Council**) has clearly demonstrated and communicated to the community through key policy documents, that increased density and building height in well serviced and located areas is a key policy position that Council is trying to progress, acknowledging planning scheme amendments to reflect such policies take time to enact. Additionally, this policy position supports the position of *ShapingSEQ South East Queensland Regional Plan 2023*, the prevailing strategic planning document for the SEQ region.

As such, the below summary of Council's key strategic policies has been provided (in addition to the commentary provided in the original town planning report on these key policies), to demonstrate the clear policy shift which encourages an increased level of density and building height in well located areas of the city. These core policies support high-density infill development, such as that proposed on site in areas such as Auchenflower.

The key policy documents include:

- Brisbane's Sustainable Growth Strategy
- Brisbane's Inner City Strategy; and
- ShapingSEQ South East Queensland Regional Plan 2023

Brisbane's Sustainable Growth Strategy

Brisbane City Council's (**Council**) *Brisbane's Sustainable Growth Strategy- Our City's Housing and Homelessness Strategy* (**the growth strategy**) is a key strategic policy document which sets forth Council's key priorities and actions aimed at balancing housing supply and the impact on the environment. The policy states that '*...the vast majority of new homes will need to be built in already established areas*' and that to ensure Brisbane can accommodate the rapidly growing population '*...while also keeping housing affordable means that areas around Brisbane must accommodate increased density.*'³

The growth strategy outlines the following key priorities for the city and residential sector:

- Housing supply for our growing and evolving city;
- Housing diversity and affordability
- Right housing in the right locations; and
- Sustainable, liveable and well-designed sub-tropical homes

Additionally, the strategy seeks to '*investigate opportunities to increase the supply of large apartments that will provide affordable and convenient housing options for families...*'⁴

As identified by the growth strategy, Council intends to undertake inner city and suburban renewal planning which will identify areas to accommodate increased density⁵ (and therefore building height uplift). Council's renewal planning process is currently underway; however, implementing changes within the planning scheme takes time. The policy direction toward increased density in inner-city areas is reflected in several ongoing Council projects. While Toowong and Auchenflower are not included in the current program, their proximity to major centres and the CBD suggests that a similar

³ Brisbane's Sustainable Growth Strategy, pg 2-3.

⁴ Ibid, pg 19.

⁵ Ibid, pg 24.

shift toward higher densities is a reasonable expectation based on the policies and projects already in progress.

Key Council projects and proposed amendments to *City Plan 2014* (Version 35.00/2025) (**City Plan**), relating to increasing inner-city and suburban densities and building heights include:

- More Homes, Sooner: Low-medium density residential zone review;
- Tailored amendment package – Indooroopilly, Carindale and Nundah major centres;
- Alderley Centre Suburban Renewal Precinct Plan;
- Mt Gravatt Centre Suburban Renewal Precinct Plan; and
- Wynnum Centre Suburban Renewal Precinct Plan.

It should be noted that the above mentioned amendments contemplate building height of up to 30 storeys in Carindale (a suburb located approximately 8km from the CBD), demonstrating that increased building height in residential areas is clearly contemplated by Council.

Therefore, while the growth strategy is not a statutory document, comfort can be gained knowing that the approach taken with the proposed development (facilitating larger dwelling units that provide housing choice, particularly for families) is consistent with Council's broader strategy intentions.

Brisbane's Sustainable Growth Strategy strongly supports higher-density development in areas with convenient access to public transport, services, and a diverse range of housing options. This policy direction reflects Council's response to the increasing pressure on housing supply across Brisbane.

Brisbane's Inner City Strategy

The Inner City Strategy recognises that the inner city will play a significant strategic function in meeting future growth needs for Brisbane and South East Queensland, with development able to be located with access to high frequency public transport, services and employment.

Pursuant to Council's *Inner-City Strategy*, the subject site is identified as apart of 'Brisbane's lifestyle corridor' and an 'inner city growth area' (**Figure 7**). This identification indicates that Council is anticipating the site and surrounding locality to support increased densities in the lead up to the Brisbane 2032 Olympic and Paralympic Games.

In addition, the subject site (and broader Auchenflower, Toowong and Milton locality) is identified as a key inner-city precinct (**Figure 8**), which identifies opportunities to build on established strengths and infrastructure investment to enhance lifestyle, local amenity and destination qualities.

The strategy encourages the delivery of diverse, exemplary housing within inner city precincts that meets the evolving housing needs and demands. The proposal provides the opportunity for families to live within a high accessible and serviced inner city precinct, pursuant to the intentions sought within the Strategy.

The proposal aligns with the intent of the strategy for the following reasons:

- The proposal provides the opportunity for families to live within a high accessible and serviced inner city precinct, pursuant to the intentions sought within the inner-city strategy.
- The proposed residential breakdown delivers a diverse housing product to cater for different needs and living arrangements. The proposal provides housing supply and choice in a highly sought after inner-city location, which is well located to provide housing supply.
- The proposal provides a verge / corner dedication, improving cycle connectivity to the riverside bicentennial bikeway. The proposed dedication creates an opportunity to enhance the streetscape and improve the public realm contribution through subtropical planting along the site's frontage.

Having regard to the above, it is evident that the proposal aligns with Council's strategic intent for the site and broader inner-city area (as expressed to the community via *Brisbane's Inner-City Strategy*) through the provision of infill housing, high quality lifestyle and amenity and an active, pedestrian oriented streetscape.

The strategy highlights that the inner city is the right location for growth, supported by existing and planned infrastructure.

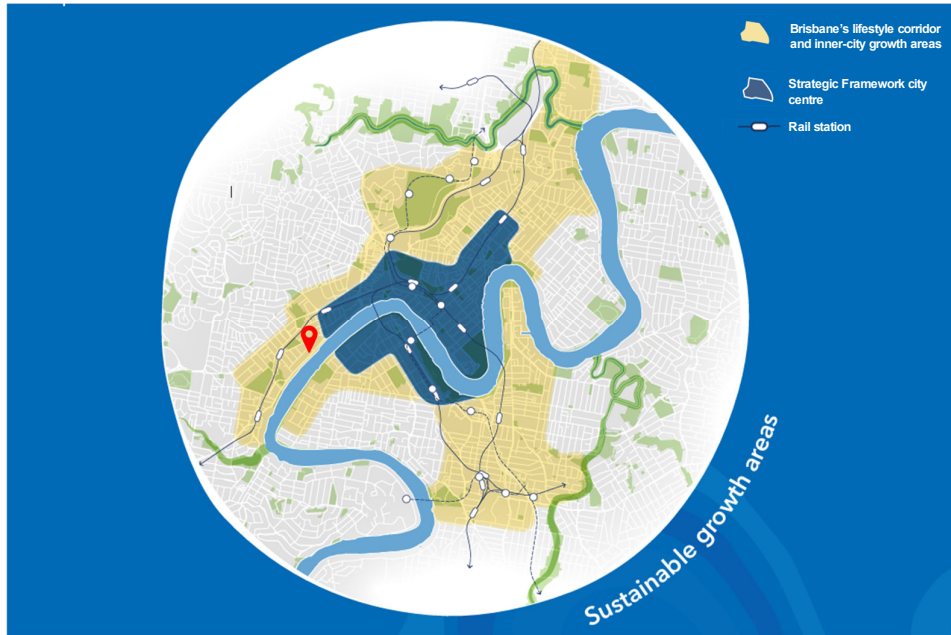


Figure 7: Extract of sustainable growth areas, site identified in red (Source: Brisbane City Council, 2023)

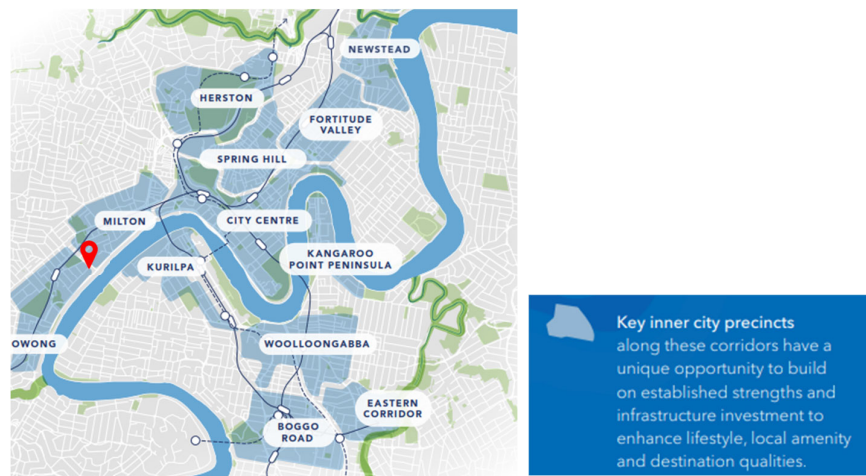


Figure 8: Brisbane's Inner City Strategy – Subject Site identified in red. (Source: Brisbane's Inner City Strategy, 2023)

South East Queensland Regional Plan

As outlined within the original town planning assessment, the South East Queensland Regional Plan 2023 (Shaping SEQ 2023) provides a sustainable growth management strategy for the region that articulates strategic direction and certainty that will accommodate an increase in population in South East Queensland.

As prescribed in Section 26(2)(a)(i) of the Planning Regulation, the regional plan represents an assessment benchmark and the assessment manager must have regard to regional plan, if it is not identified as being appropriately reflected in the planning scheme.

Shaping SEQ 2023 recognises the current housing supply issues faced in South East Queensland and specifically identifies a target of 210,800 additional homes to be provided within the Brisbane Local Government Area from 2021 – 20246. The proposed development will contribute to the supply of housing within Brisbane.

Dwelling diversity sub-targets complement the dwelling supply targets to provide further direction on the preferred mix of dwelling types needed to accommodate changing populations and households by 2046. Supply of housing in a diverse range of built forms is critically important to achieve the dwelling supply targets, respond to changing households, provide greater housing choice and deliver gentle density in partnership with local governments and industry.

The SEQ Regional Plan defines high-rise buildings as comprising a building height greater than 9 storeys. In 2021, 8% of housing in the Brisbane LGA was in the form of high-rise building. The ShapingSEQ 2046 target for high-rise buildings within the LGA is to grow to 14%. Refer to **Figure 9**.

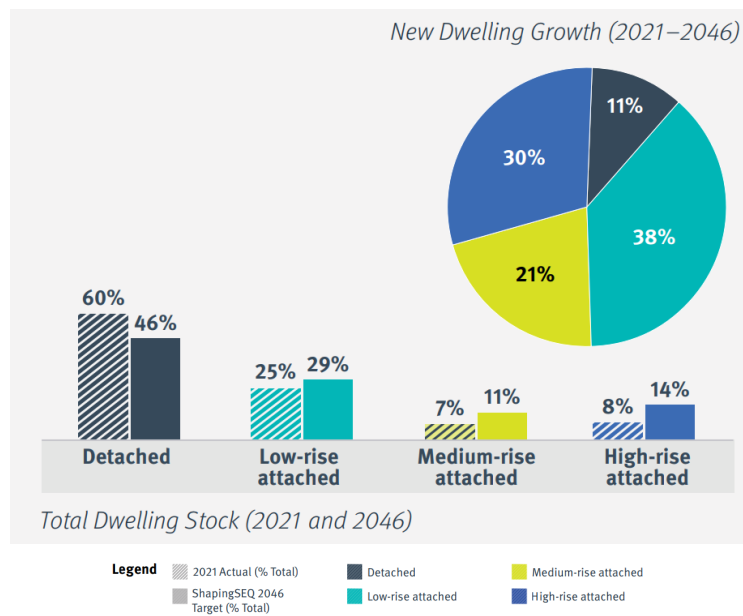


Figure 9: Dwelling diversity targets to 2046 in Brisbane LGA (Source: ShapingSEQ, 2023)

The South East Queensland Regional Plan 2023 refers to High Amenity Areas which directs increased residential densities to support dwelling yield within areas that benefit from a combination of access to high frequency public transport, community facilities, open space / recreational opportunities and activity centres. The site includes an arrange of contextual matters, which are relevant to the site's suitability to accommodate high density residential development and reflect the key features and

criteria of a High Amenity Area as outlined within the Shaping SEQ 2023. Having regard to the above, the proposed development furthers the outcomes identified by the SEQ Regional Plan 2023.