



15 May 2026

Brisbane City Council
Chief Executive Officer
GPO Box 1434
BRISBANE QLD 4001

Via Email: CPEDS-DS-PlanningSupport@brisbane.qld.gov.au

ATTN: Sultana Alam

Dear Sultana,

RE: PARTIAL DEMOLITION OF PRE-1947 DWELLING & EXTENSION TO HOUSE IN THE HERITAGE OVERLAY UPON LAND AT 49 BULIMBA STREET, BULIMBA (COUNCIL REFERENCE A006948120)

We write in relation to the abovementioned application and Council's Information Request dated 02 April 2026.

Pursuant to section 13.2 of the Development Assessment Rules under the *Planning Act 2016*, we provide the following response to Council's Information Request.

1. Heritage

The application proposes demolition to the original built form of the heritage place, notably on the south (side) elevation which is highly visible from the street. This has a considerable impact on the simple gable form of the heritage place and therefore its significance as a striking Interwar California Bungalow style residence (Criterion E of Council's heritage citation).

The visual bulk of the rear addition, on account of its height, scale and material palette, as perceived from the public domain also impacts upon the significance of the heritage place as it diminishes the visual prominence of, rather than being visually subservient to, the heritage place.

A reduction in the built form and reconsideration of the proposed addition is required to demonstrate a more considered response to the heritage place, including a greater separation between the old and new built forms to reduce the extent of demolition proposed. Further, the proposed 1.9m front fence reduces the current visibility of the heritage place and will impede upon the ability to interpret it as a striking example of Interwar architecture.

The following information/amendments are required to be provided to enable further assessment of the proposal:

- 1) *Amendments to the application that will minimise the impacts of the proposal and ensure retention of the significance of the Local heritage place, including:*
 - a) *greater setback of the proposed rear addition from the heritage place to remove proposed demolition of those original sections of the built form of the heritage place*
 - b) *greater setbacks, reduction in height and reconsideration of the material palette of the proposed rear addition to reduce its visual bulk and prominence, ensuring visual subservience to the heritage place rather than competing with the heritage place for visual prominence which will ultimately impact upon its significance as a striking Californian bungalow; and*
 - c) *significant height reduction in the proposed fence to maintain the current level of visibility of the heritage place from the public domain and therefore its ability to be readily interpreted as a striking example of Californian Bungalow from the Interwar period.*
- 2) *Amendments to the application documentation to assist our understanding of the proposal and its true impacts upon the significance of the Local heritage place, including:*

- a) removal of all vegetation from the supplied renders so a better understanding of the proposed design is provided and how it has been designed to respond to the heritage place; and
- b) additional renders from within the street set at eye height to provide a better understanding of the true visual impact of the proposal upon the heritage place. Currently, many of the supplied renders are set low to the ground, are set immediately in front of the heritage place, or are significantly populated with vegetation that does not exist on the site, all of which reduce the ability to discern the true impact of the proposed rear addition; and
- c) clear and concise renders without visual impediment are required to demonstrate the true impact of the proposed works on the heritage place to assist Council's assessment.

Council has raised concerns regarding the extent of demolition to the southern elevation, the visual prominence of the proposed rear addition, and the height of the proposed front fence.

In response, updated architectural drawings have been prepared by *Invilla Architecture* together with a detailed supplementary heritage response prepared by *Vault Heritage Consulting*, enclosed for Council's consideration.

1a. Demolition and Southern Elevation

As identified within the Heritage Response prepared by *Vault Heritage Consulting*, the dwelling has undergone a series of alterations and additions over time, including more recent roof and rear modifications. While it is acknowledged that a small portion of the southern roof form may contain remnants of earlier fabric, the majority of the elements proposed to be removed form part of later modifications and do not represent the primary heritage significance of the place.

The proposed demolition is limited in extent and is required to facilitate the integration of the rear extension in a functional and cohesive manner. The works allow for improved internal amenity, liveability and functionality of the dwelling while maintaining the dominant presentation and architectural integrity of the original heritage residence.

Importantly, the proposal retains the original core of the heritage dwelling, including the principal façade, dominant gable roof form and defining architectural elements associated with the Interwar California Bungalow character of the place. The proposed works do not alter the prominent streetscape presentation of the dwelling and remain visually recessive when viewed from the public domain.

Accordingly, the proposal maintains the simple gable form and heritage character of the residence, while enabling a sensitive and functional contemporary extension that supports the ongoing use and adaptation of the Local Heritage Place.



Figure 1. Original core of heritage house shown in red dashed linework (Adapted from Heritage Response by Vault)

1b. Rear Addition – Bulk, Scale and Visual Prominence

The attached Heritage response letter by *Vault Heritage Consulting* responds directly to Council's concerns regarding the bulk and visual prominence of the rear addition. The heritage building is retained in its entirety at the front of the site, maintaining its prominence within the streetscape. The addition is located to the rear and has been designed to remain visually recessive when viewed from the public domain. Importantly, the proposed works do not extend beyond the general footprint and visual relationship established by the existing post-1974 and circa 2011 rear additions currently approved and existing on site.

Updated plans and 3D perspectives demonstrate that the heritage dwelling continues to read as the dominant built form from Bulimba Street, with the addition largely screened and not competing for visual prominence. Refer to Figure 1 and 2. Accordingly, the proposal achieves an appropriate balance between retention of the heritage place and provision of contemporary living spaces, without adversely impacting its significance. The proposed works maintain key architectural features of the interwar residence such as the roofing style, façade presentation and does not reduce the dominance of the original house.



Figure 2. Rendered image of the Greenock residence and the extension at the rear from Bulimba Street

1c. Front Fence and Visibility

In response to Council's concerns regarding the proposed front fence, the height has been reduced to approximately 1.5m which is generally consistent with the combined visual screening currently created by the existing fence and landscaping. This reduction ensures that the visibility of the heritage place from the public domain is maintained and that the dwelling can continue to be readily interpreted as a representative example of Interwar architecture.



Figure 3. Street perspective of proposed and current site

2. Visual Impact and Streetscape

The amended plans include additional renders and perspectives to assist Council in assessing the true visual impact of the proposal. The amended plans demonstrate that the heritage dwelling is already partially screened by established street trees and landscaping within the frontage. In this regard, the removal of vegetation from the street perspectives presents an unrealistic representation of how the dwelling and additions are experienced from the public domain.

To provide a more balanced assessment, side-by-side views have been included showing both proposed and existing landscaped conditions. These perspectives demonstrate that existing and future vegetation continue to contribute to filtered views of the dwelling and assist in softening the visual presentation of the rear addition. The proposal does not introduce any significant additional visual impacts beyond the existing built form conditions on site. The revised perspectives also confirm that the original heritage dwelling remains the visually dominant element when viewed from the street, with the additions recessed behind and read as secondary elements within the broader composition of the site.

Additional renders have also been enclosed as part of this response to accurately depict the relationship between the existing dwelling and the proposed additions.



Figure 4. Street perspective of the proposed dwelling with landscaping and existing vegetation screening

In conclusion, the amended proposal plans has been carefully revised to respond to Council's concerns while retaining the key characteristics and significance of the heritage place. Please refer to the heritage response prepared by *Vault Heritage Consulting* for further information and justification to Council's request. We have also enclosed an appendix to support the Information Request response.

We have now fully responded to Council Information Request in accordance with section 13.2 of the Development Assessment Rules under the *Planning Act 2016* and respectfully request that Council proceed with the assessment of the application.

Should you wish to discuss the matter further, please do not hesitate to contact our office.

Yours faithfully

TOWN PLANNING ALLIANCE PTY LTD

Tara Nunn
SENIOR PLANNER

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APPENDIX 1



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