



**Our ref:** STP4827  
**Contact:** Jack Denham | [jack@steffanharries.au](mailto:jack@steffanharries.au)  
**Website:** [www.steffanharries.au](http://www.steffanharries.au)  
**Phone:** 07 3317 0042



Tuesday, 21 April 2026

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

**Attention:** Nicholas Cudicio  
Via email: [DSPlanningSupport@brisbane.qld.gov.au](mailto:DSPlanningSupport@brisbane.qld.gov.au)  
Cc: [Nicholas.Cudicio@brisbane.qld.gov.au](mailto:Nicholas.Cudicio@brisbane.qld.gov.au)

## Re: RESPONSE TO THE PUBLIC SUBMISSIONS

**Reconfiguring a Lot (1 into 2 Lots)**  
**Council reference:** A006903961  
**23 The Esplanade, St Lucia QLD 4067**  
**Lot 680 on RP40784**

Dear Nick,

We write to you in regard to the submissions received following the public consultation period for the above-mentioned development application. We provide this response to assist Council in assessing whether the matters raised by the public are relevant to the applicable planning matters of this application.

### Overview of Submissions

Submission Number	Date	Submitter	Submitter Relationship to Site
20260417-47079	17 April 2026	Anonymous	Neighbouring Resident
20260417-47526	17 April 2026	Anonymous	Neighbouring Resident

We note that both submissions were made by the same person, and inter-reference each other. As such, our response combines the concerns raised and response to the individual elements of both submissions as if they were provided together.

## Response to Submissions

**Submission Ref:** 20260417-47079, 20260417-47526

Summary of Submitted feedback	Applicant response
<p>1. The proposed lots are 359m<sup>2</sup> and 367m<sup>2</sup> and argues that, for lots between 300m<sup>2</sup> and 400m<sup>2</sup>, they must be within 200m walking distance of a Centre zone. They say the nearest relevant Centre zone is the Hawken Drive shops, but contend the shortest walking route is about 260m, based on a Google Maps screenshot, and therefore the lots do not meet the minimum dimensions required by the code. They further argue that, if the site is not within 200m of a Centre zone, the minimum lot size becomes 400m<sup>2</sup>, which the proposal does not achieve.</p>	<p>As discussed in section 7.3.1 of the Town Planning Report, the development is located to be approximately 208m walking distance away from the frontage of the Centre zoned land along Hawkin Drive.</p> <p>The marginal 8m exceedance in walking distance is directly attributable to the unique front boundary alignments present along this section of the street and practically this additional distance would not limit future residents of the subject site in walking to this Centre.</p> <p>Ultimately the development complies with the intent of the Strategic Framework to provide for increased densities in development where nearby to Centre zoned land and within the Urban Footprint.</p> <p>Beyond this, the proposal is compliant with the draft Citywide amendment – More Homes, Sooner – Low-medium density residential design, which forecasts this provision to change from a minimum 200m walking distance to a minimum 300m walking distance.</p>
<p>2. A development footprint plan is said to be missing and necessary. The same submission repeatedly says that, because the minimum dimensions are not met, the applicant should provide a "development footprint plan" so the public and Council can properly assess the likely dwelling outcomes. The concern is not just that the plan is absent, but that the material currently available is said to be insufficient to show whether compliant houses can actually be developed on the lots. The submitter also says that, if approved, the footprint plan should be conditioned to be included on the plan of subdivision.</p>	<p>A development footprint plan was provided within the original lodgement package and was subsequently requested by Council to be removed within the information request issued on 16 December 2025.</p>

<p>3.</p>	<p>The submitters say the proposed lots may not physically accommodate compliant dwellings. One submission points to the proposed lot width of about 7.479m and says it would likely be impossible to satisfy the required setbacks and separation outcomes, particularly the requirement for 3m to any private open space on an existing or proposed adjoining small lot. The same submitter also says the Conceptual Engineering Drawings dated 15 March 2026 appear to show principal private open space with a minimum dimension of only 2m, rather than the 4m minimum they say is required. The concern being raised is that the lots are too constrained to properly accommodate dwellings, ancillary structures and access.</p>	<p>The development complies with Performance Outcome 1 of the Subdivision code.</p> <p>Further, as the minimum rectangle shape can be accommodated within each lot for allotments within 200m walking distance of Centre zoned land, being 6m x 15m, it is envisaged that future Dwelling houses can reasonably be supported by the proposed allotments. Supporting this, it is recognised that under <i>City Plan 2014</i>, the development would be Code Assessable if not for the identified non-compliance in walking distances.</p> <p>No buildings are proposed within this Reconfiguration of a Lot application that would require assessment of "<i>principal private open space</i>".</p>
<p>4.</p>	<p>The submitter frames the proposal as inconsistent with the character of St Lucia and The Esplanade. They describe St Lucia as a "green and leafy low density suburban area" with a strong sense of place and describe the surrounding area as containing single dwellings and unit blocks with a maximum of 10 units that do not exceed 2-3 storeys, including older, mid-century homes that have been maintained or renovated. One submitter says the proposal would lead to outcomes that are "structural eyesores" and "do not have a place on The Esplanade, let alone in St Lucia". The other says the proposal does not appear to fit the character of the neighbourhood or benefit the intended residents it is supposedly meant to serve.</p>	<p>The development does not seek approval for any buildings or land uses.</p> <p>The existing Dwelling house is not mapped within the Traditional Building Character overlay and as such its demolition is not an assessable component of this application.</p>
<p>5.</p>	<p>There is a specific concern about the existing dwelling as a character element of the site. One submission describes the house at 23 The Esplanade as a "well-loved and maintained family home" and "a beautiful example of mid-century Brisbane architecture". The concern is that subdivision would lead to the destruction of that house and therefore an erosion of the established built character of the area. This point is tied to the broader submission that surrounding homes and unit blocks are of a similar mid-century character.</p>	<p>The existing Dwelling house is not mapped within the Traditional Building Character overlay and as such its demolition is not an assessable component of this application.</p>

6.	<p>Vegetation loss is a major concern and is used as evidence of existing impact. One submitter says the property previously contained about 12 mature trees that provided amenity, noise reduction, privacy, shade and habitat for native fauna. They say the removal of those trees in September 2025 has already caused a marked increase in use of air conditioning, and has reduced biodiversity, breeze and shade for nearby residents. They argue the subdivision and resulting development would likely cause further loss of vegetation and green space and further erode the "green and leafy character" of the area.</p>	<p>The subject site does not contain any protected vegetation.</p>
7.	<p>Amenity impacts on adjoining residents are raised in very direct terms. The second submission says the proposal will affect breeze and air flow, natural light, privacy and quiet enjoyment, and that new residences on the subdivided lots would likely be built to the property line and to maximum height allowances, with windows facing into nearby units and balconies. The first submission also refers to "subpar living" for future residents and says the development would adversely impact the locality. Together, the concerns are about overlooking, reduced separation, reduced openness, and a more built-out form than what currently exists.</p>	<p>All future development within the proposed allotments will be required to be in accordance with the relevant design and siting matters of <i>City Plan 2014</i>.</p> <p>Residential uses are able to be supported on lots with sizes similar to the proposal, as evident by similar developments within Brisbane.</p>
8.	<p>Parking pressure is raised as a practical impact of the subdivision. One submitter says the proposal would "with certainty adversely affect the availability of on-street car parking" because there will be more residents, the current plans do not appear to contemplate car parks or driveways, and on-street parking is already limited. They also rely on personal observation, saying they regularly witness people parking on council land near 23 and 27 The Esplanade. The other submission similarly says there is limited on-street parking at this point of The Esplanade and that subdivision would likely increase demand for street parking.</p>	<p>No land uses are proposed within this application for parking to be an assessable component of the development.</p>

9.	<p>Traffic and construction disruption are also raised. One submitter says subdivision, demolition and future building works will significantly impact the neighbourhood, noting that The Esplanade is a route used by students and other residents and that use of this road helps reduce traffic on Hawken Drive, Sir Fred Schonell Drive and past Ironside State School. The concern is less about detailed traffic engineering and more about general local disruption and added vehicle activity.</p>	<p>The proposed development is for a minor and small-scale 1 into 2 lot residential subdivision with no works outside of the property boundary.</p> <p>We cannot reasonably foresee the concern raised as being applicable to the development.</p>
10.	<p>Flood risk is raised because the site is said to be affected by flood controls. One submission says the property is within Brisbane River flood planning area 5 sub-category and flood overlay and argues that any development application should consider the impact of increasing the number of dwellings and residents on a flood-affected site. The concern raised is that approval would increase the exposure of people and property to flood hazard during flood events.</p>	<p>The development complies with the Acceptable outcomes of the Flood overlay code and is therefore compatible with the type and form of development expected within this overlay.</p>
11.	<p>Environmental and ecological concerns are tied to planning policy language. The second submission refers to the Toowong-Indooroopilly district neighbourhood plan outcomes about maintaining the "green and leafy character of the district" by retaining mature vegetation and ensuring that "ecological corridors linking Mt Coot-tha and the Brisbane River are protected and enhanced." The concern is that the site has already been stripped of mature vegetation and that future development will compound that loss.</p>	<p>The subject site does not contain any protected vegetation and is mapped within an urbanised area of Brisbane.</p>
12.	<p>There is also a concern about likely site works and built form outcomes, even if not yet shown in detail. One submitter says the cut-and-fill techniques to level the site's topography suggests the "cheapest" form of development may involve block before building. More broadly, both submissions assume that subdivision will lead to future houses that fill most of each lot, with reduced green space and limited separation. That concern is linked to both amenity and character.</p>	<p>It is unclear what impacts are expected by the submitter as a result of "future fill".</p> <p>Nonetheless, the development proposes to undertake filling and excavation works to suitably level the site to achieve a LPOD and accommodate for future Dwellings on the lots as per the RPEQ engineering drawings provided within the Information request response.</p>

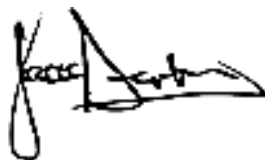
13.	The proposal is said not to deliver a meaningful housing outcome. One submitter refers to Council's housing strategy and argues that subdividing into two lots is unlikely to improve housing diversity and affordability, particularly if it only results in two single dwellings rather than the smaller housing types said to be needed. They say this will have nominal impact on the identified housing need for 1-2 bedroom dwellings.	Conversely, the development supports the strategic intent for the subject site under <i>City Plan 2014</i> .  No buildings or land uses are proposed within this application, but it is envisaged that future Dwelling houses will support the viability of the nearby centre along Hawkin Drive.
14.	The owner's use of the site is raised as part of the opposition narrative. The second submission says the property has sat empty for almost a year, aside from short-term stays administered through Airbnb, and suggests the current owner may be land banking the site. This is used to argue that the redevelopment is speculative and not a genuine response to housing need.	Not a relevant planning matter.
15.	Both submissions end with a broader claim that the proposal will diminish the quality and identity of the locality. This includes assertions that it may reduce surrounding property values, weaken St Lucia's identity as a leafy and intentional suburb, disappoint current residents, and result in a poorer overall built outcome than what currently exists. One submission expressly says the proposal is not the way to achieve housing affordability and accessibility.	Conversely, the development has shown that it supports the character of the locality and is aligned to the general intent of the Planning scheme codes and the specific intent of the Strategic framework.

We do not foresee any major additional concerns from Council but wish to formally request that should Council have any additional or outstanding issues to please contact us prior to making a decision.

Kind regards,



Mike Harries | Director  
**Steffan Harries**  
 Email: [mike@steffanharries.au](mailto:mike@steffanharries.au)



Jack Denham | Undergraduate Town Planner  
**Steffan Harries**  
 Email: [jack@steffanharries.au](mailto:jack@steffanharries.au)