

RE: A006934633 – 127 Edward Street, Brisbane – Submission

From

Date Thu 2026-06-04 3:33 PM

To CPEDS-DS-PlanningSupport <CPEDS-DS-PlanningSupport@brisbane.qld.gov.au>; CPEDS-DS-PlanningSupport <CPEDS-DS-PlanningSupport@brisbane.qld.gov.au>

 2 attachments (282 KB)

This email originates from outside of Brisbane City Council.

From:

Sent: Thursday, 4 June 2026 12:53 PM

To: 'dsplanningsupport@brisbane.qld.gov.au' <dsplanningsupport@brisbane.qld.gov.au>;

Subject: A006934633 – 127 Edward Street, Brisbane – Submission

Dear Sir/Madam,

I refer to the above development application and attach a submission

Please acknowledge receipt of this properly made submission.

Regards,

Council Ref: A006934633

Thursday, 4 June 2026

Assessment Manager
Development Services
City Planning & Sustainability
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

Via email: dsplanningsupport@brisbane.qld.gov.au / shirley.mills@brisbane.qld.gov.au

Dear Sir / Madam

Submission to Development Application A006934633 for Development Permit for Material Change of Use – Centre Activities (Short-term accommodation, Food and drink outlet, Function facility, Indoor sport and recreation), Hotel and High Impact Industry (Standby Generator) and Development Permit for Building Work on/adjoining a Local heritage place in respect of 127 Edward Street, Brisbane

write to provide a submission objecting to a development application submitted by Precision Group. The development application (Council Reference: A006934633) ('the application') seeks Brisbane City Council's ('Council') approval for the development of the site located at 127 Edward Street, Brisbane (Lot 1 on RP191653) for the purposes of constructing a hotel tower (Short-term accommodation, Food and drink outlet, Function facility, Indoor sport and recreation, Hotel and High impact industry).

A review of the development application material highlights that the proposal results in significant non-compliances with the *Brisbane City Plan 2014* ('planning scheme' or 'City Plan'). This submission outlines the grounds of objection to the proposal and details the facts and circumstances relied upon in support of the objection.

objects to the proposed development at 127 Edward Street, Brisbane, based on the following grounds, summarised as:

- Due to numerous non-compliances, the application seeks to rely on a multitude of performance outcomes relating to the tower form and presentation, which, when combined, result in a scale and design that will cause significant and undue adverse amenity impacts to adjoining properties and prejudice their development. These non-compliances relate to:
 - Tower site cover
 - Setbacks
 - Building separation
 - Access and servicing
 - Landscaping

Non-Compliances

In addition to tower site cover, the proposed development raises a number of further non-compliances against the relevant key acceptable outcomes within the planning scheme, with inadequate justification provided to demonstrate fulfillment of the corresponding performance outcomes. The key non-compliances are discussed below.

Tower site cover

At 50.3%, the proposed development exceeds the 45% maximum tower site cover prescribed for a 'residential' development in the city centre on a site of this size. It is understood that this long-established control was introduced to limit the scale and impact of towers on adjoining properties and ensure that their future development is not prejudiced. It is also applied to promote a more cohesive streetscape and built form character, as well as allowing for suitable light penetration, air circulation, views, vistas and privacy (as outlined in PO5 of the City Centre neighbourhood plan code).

Whilst numerically the tower site cover exceedance might seem marginal, at 51 storeys, its scale manifests in greater impacts on adjoining properties than provided for in the City Plan. These impacts are compounded by the fact that the tower also has a number of non-compliant setbacks and separation distances, including to the boundary which is at considerably less than the prescribed 5m (2.75m is proposed – refer to concerns outlined below).

Setbacks

The proposal fails to meet the minimum setbacks on two of its four frontages –

There also appears to be some confusion regarding the categorisation of the setback to the boundary with ie if it is a side setback or rear setback. In our view, it will function more as a rear setback with the proposed lift core and stairwell oriented to the boundary . As such, we consider the minimum rear setbacks should apply.

In any event, the proposal fails to comply with the minimum setback either as a side setback or rear setback. As a rear setback it is reduced by over 2m (2.75m versus 5m prescribed). Given the scale of the tower, we consider this to be unacceptable and gives rise to an adequate building separation (refer to concerns outlined below).

Building Separation

At 7.5m all the way to the 51st level, the tower separation between the proposed tower and the existing is significantly compromised. The Acceptable Outcome specified in the City Plan is 12m for tower levels above 9 storeys; indeed 7.5m is less than the 10m minimum prescribed for towers within the same site.

The Applicant, in the planning report accompanying the application, seeks to justify the non-compliance by stating:

“The accommodation rooms do not face the adjoining building, thus ensuring visual privacy. Any future development at will be able to be flexible in terms of land use (either commercial or residential or a combination of both) as the proposed building elevation facing that site does not include accommodation rooms, thus the potential for overlooking is eliminated.”

We consider this justification to be inadequate as it assumes that any redevelopment of would be for commercial uses, eliminating any potential for overlooking. For a residential development outcome, to achieve a compliant building separation between habitable rooms facing the proposed blank wall of the tower, a future residential tower may need to be setback by over 15m (to achieve a compliant 18m) or nearly 9m where non-habitable rooms are proposed. The requirement for an 8m setback is in place to achieve appropriate building separation between two residential towers (whether it be for Short-term accommodation or Multiple dwellings).

In a commercial redevelopment, the 7.5m distance, if approved, would also prejudice the potential to achieve a compliant floorplate at 50% tower site cover on in the event of redevelopment. It could force any future podium and/or tower to position further east to the boundary with the rear of the heritage properties on Market Street (and in turn impact on their amenity) and require further performance outcomes. This also has the potential to challenge the ability to maintain a complaint arcade linking Charlotte Street to Mary Street – as sought by AO21 of the City centre neighbourhood plan code (amongst other things).

Whilst we support a performance based approach to sites in the city centre, we would strongly urge Council to consider the consequences of allowing such a significantly reduced building separation distance. This includes acknowledgement that future development of adjoining properties will require flexibility and performance solutions to address the consequences of approving the proposed tower at 127 Edward Street in its current form.

Access and Servicing

We note that the proposed development, due to the very limited site area, is unable to achieve full onsite manoeuvring by standard service vehicles. Consequently, we understand that it is proposed to provide a turntable, which Council has advised is not supported (as expressly stated in its Information Request). We are concerned therefore that the servicing arrangements are compromised and have the potential to impact on the safety of vehicles and pedestrians moving along Charlotte Street but also vehicles seeking to exit the car park

Council has also raised significant concerns regarding the width of the loading dock and service area, as well as the visual impact on Charlotte Street, stating that the impact “will be considerable.”

Whilst the Applicant has amended the design, it is also proposing to remove a 40+ year old Leopard tree plant a new Street tree further east towards [redacted] adjacent to its crossover. It is not clear whether the proposed street tree meets the requisite separation requirements from the driveways. As such the street tree also has the potential to impeded on the safety and enjoyment of the existing access arrangements. We trust therefore that if this arrangement is to be supported by Council that the siting of the tree will not impact on the safety and enjoyment of the existing access arrangements at [redacted].

Conclusion

This submission raises a number of key issues in respect of the development application, including the number and extent of non-compliances with the key acceptable outcomes of the planning scheme.

The extent and impact of non-compliances with key tower site cover, setbacks and separation distances will result in significant impacts to the character and amenity of the locality, which are over and above the reasonable expectations of the community. The justification put forward by the Applicant in support of the proposal does not, in our opinion, overcome or outweigh, the impacts and level of non-compliance with the City Plan.

We are also concerned that insufficient consideration has been given to the impact of the proposed siting and design of the tower on potential future development outcomes on [redacted]. PO6 of the City centre neighbourhood plan requires development to be of a scale and design that does not prejudice the development of adjoining sites. Careful consideration should be given to the consequential impact of the proposal on such outcomes, both residential and commercial development scenarios, that have the potential to include future podium and tower forms on [redacted].

In the light of the findings above, [redacted] objects to the design in its current form and respectfully requests that the development application be revised to address the concerns raised in this submission, many of which have been echoed in Council's information request.

We look forward to receiving Council's acknowledgement of this properly made submission.

Should you wish to discuss any aspect of this letter, please contact the undersigned directly via phone

Yours sincerely

[redacted signature line]