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The Assessment Manager
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

RE: OBJECTION TO DEVELOPMENT APPLICATION A006954430
SITE ADDRESS: 355 CORONATION DRIVE AND 6 LANG PARADE, AUCHENFLOWER

SUBMITTER DETAILS:

To the Assessment Manager,

I, _____ formally lodge this submission objecting to the proposed development at 355 Coronation Drive and 6 Lang Parade, Auchenflower. This objection is submitted on the grounds that the proposal fails to comply with the Brisbane City Plan 2014 and the Toowong-Auchenflower Neighbourhood Plan. The proposal represents an overdevelopment of the site that is inconsistent with the surrounding character and fails to provide adequate infrastructure or mitigation for its significant impacts.

HEIGHT AND SITE AREA NON-COMPLIANCE

The proposed height of 23 storeys (76.4m) is almost three times the 8-storey limit set by the Neighbourhood Plan. This scale is entirely inconsistent with the established low and medium-rise residential character of the immediate area. Furthermore, the subject site is 1,430m², which is deficient against the minimum 1,500m² threshold required for height uplift consideration under the City Plan. The proposal attempts to bypass these critical site area requirements without justification, rendering the proposed height increase an invalid planning outcome.

TRAFFIC AND ACCESS

The proposed development includes an inadequate 6m queue, whereas the required capacity is 36m. The applicant declined to address this specific requirement in the Council's Information Request. The proposal relies on low-turnover estimates of 27 movements per hour, which are unrealistic given the proposed residential density. The current design necessitates the removal of 2 on-street car parks and 2 motorcycle spaces, which diminishes existing public accessibility. This is an inadequate Performance Solution that compromises street safety and function.

FLOOD RISKS

The developer has refused to meet the requested RL 6.3m AHD flood immunity level, instead maintaining the proposed basement entry at RL 5.7m AHD. The reliance on a Flood Emergency Management Plan and shelter-in-place procedures on the first floor is an inadequate Performance Solution. This approach transfers undue risk to future occupants and fails to meet the safety standards required for this locality.

SITE COVER AND SETBACKS

The proposed site cover of 59-60% significantly exceeds the 50% maximum limit allowable under the Neighbourhood Plan, resulting in overdevelopment and excessive building bulk. Additionally, the tower front setbacks of approximately 3.5m on Lang Pde and 4.5m on Coro Drive are deficient against the 5m requirement. These departures from the acceptable outcomes increase visual bulk and reduce the available area for the streetscape canopy, negatively impacting the public realm.

LANDSCAPE DEFICIENCIES

The proposal provides only 5.98% natural in-ground deep planting. The applicant refused to incorporate the requested double-height planters, opting instead for shallow 600mm distributed planters. This fails to meet the intent of the

Brisbane City Plan regarding site greening and biological diversity.

UNVERIFIED WIND IMPACTS

The applicant declined to undertake physical wind tunnel testing as requested. The reliance on a qualitative visual inspection is insufficient to determine the likely wind speeds at the ground plane. Without verified empirical data, the proposal fails to demonstrate that it will not create dangerous or uncomfortable wind conditions for pedestrians and residents in the vicinity.

AMENITY IMPACTS

The proposed massing and height result in significant overshadowing and the potential loss of privacy for surrounding low and medium-rise residential properties. The scale of the development is incompatible with the existing residential amenity of the area, including the properties along Dunmore Terrace.

INSUFFICIENT NEED DEMONSTRATED

There is no demonstrated community or economic need for this scale of luxury units. Under the principle established in *Bell v BCC*, the applicant has failed to substantiate that the scale of this development is necessary or that it provides a public benefit that outweighs the identified planning non-compliances.

CONCLUSION

The proposal for 355 Coronation Drive and 6 Lang Parade is fundamentally flawed. It fails to meet the mandatory requirements of the Brisbane City Plan 2014 and the Toowong-Auchenflower Neighbourhood Plan across multiple critical areas, including height, site area, setbacks, flooding, traffic, and landscaping. I request that the Assessment Manager refuse this application in its current form.

Yours sincerely,