



28 May 2026

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

Via email: DSPlanningSupport@brisbane.qld.gov.au

ATTENTION: ALEXANDRIA WOOD

Dear Alexandria,

RE: RESPONSE TO SUBMISSIONS FOR MATERIAL CHANGE OF USE FOR A MULTIPLE DWELLING (4 TOWNHOUSES) UPON LAND LOCATED AT 5 ROSEGLEN STREET, GREENSLOPES QLD 4120 – COUNCIL REFERENCE A006910166.

We write with respect to the abovementioned Development Application (Council file reference: A006910166). In accordance with Part 4 of the Development Assessment (DA) Rules under section 68 of the *Planning Act 2016*, we have now completed the required public notification for the proposed development over the land at 5 Roseglen Street, Greenslopes QLD 4169.

The Notice of Compliance was issued to your office on 20 May 2026. We have since reviewed Council's public scrutiny file which confirms that a total of two (2) properly made submissions were received during the public notification period. We acknowledge these submissions, seek to address their concerns accordingly and clarify our position on the issues raised against the relevant provisions of the *Brisbane City Plan 2014*.

No. of submissions received:	2	Valid	0	Invalid
Nature of valid submissions:	0	Support	2	Object
Nature of invalid submissions:	0	Support	0	Object

OBJECTION ISSUE (SUMMARISED)	RESPONSE
Building height, bulk, scale and massing	
<ul style="list-style-type: none"> The development is an overdevelopment of the site and does not respect the character of the surrounding streetscape and adjoining properties. The built form, particularly the rear townhouses, does not sensitively reduce height towards the side and rear boundaries. The design relies on substantial cut and fill rather than working with the natural fall of the site. The townhouse layout pushes the building 	<p>The proposed partial 3 storey townhouse form is consistent with the Low-medium density residential (2 or 3 storey mix) zone, which anticipates development of this scale. A performance solution is sought for building height, on the basis that the additional height largely results from the steep fall of the site towards the street, with the rear of the development generally maintained at 2 storeys. A number of surrounding properties are also 3 storeys and as such, the proposed height is considered in keeping with the established and emerging character of the street.</p> <p>The built form reduces the perception of bulk through articulation, recesses and projections, breaks in the building form and a varied material palette, and is softened by deep planting and landscaping along the frontage. Generous side setbacks are provided in accordance with the acceptable outcomes, with living areas and primary windows oriented away from common boundaries. Given the natural fall of the land, the adjoining dwelling at the rear sits well above the proposed</p>

<p>envelope deep into the site and closer to boundaries than adjoining dwellings.</p> <ul style="list-style-type: none"> ▪ The proposal is inconsistent with the Low-medium density residential (2 or 3 storey mix) zone and the Coorparoo and districts neighbourhood plan. ▪ The street elevation presents a bulky, visually dominant built form inconsistent with the established streetscape. 	<p>townhouses, so interface and overlooking impacts to that property are limited.</p>
<p>Residential amenity – privacy, overlooking, building separation and subtropical design</p>	
<ul style="list-style-type: none"> ▪ Window placement and sizing result in direct overlooking of adjoining habitable rooms, living areas and balconies. ▪ No privacy diagrams have been submitted and site sections omit the height transition to adjoining properties. ▪ Reliance on offset windows and screening devices does not adequately protect privacy. ▪ Building separation between the front and rear townhouses is only 1.8m, with bedrooms facing inwards and poor access to light and breezes. ▪ The design does not adequately incorporate subtropical design principles, including eaves and awnings, natural ventilation, and covered outdoor living spaces. ▪ The development causes a loss of outlook and an overbearing effect on adjoining yards. 	<p>Amended plans were submitted in response to Council's Information Request that improve privacy and amenity outcomes between the dwellings and to adjoining properties. Privacy is addressed through offset window arrangements, varied sill heights, high-set windows and screening elements, with standard screening to 1.5m above floor level able to be secured by conditions of the approval. Habitable rooms and private open space are oriented to limit direct overlooking.</p> <p>Building separation between the front and rear townhouses is maintained at 1.8m, with the privacy treatments above ensuring appropriate outcomes. The development incorporates subtropical design principles, including sun shading to openings, cross-ventilation, shading to the western façade and 2.7m floor-to-ceiling heights to habitable spaces.</p>
<p>Landscaping, deep planting and perimeter screening</p>	
<ul style="list-style-type: none"> ▪ Deep planting along the rear boundary is not achievable and presents a risk to the existing retaining wall. 	<p>Amended landscaping and engineering plans were submitted that provide a deep planting zone along the frontage capable of supporting subtropical shade trees, with sufficient soil depth maintained clear of underground services. The sewer line referred to in the submission letters is located outside the subject site, so it does not constrain planting.</p>

<ul style="list-style-type: none"> ▪ Landscape plans depict planting along the boundary that is not achievable given the location of the existing sewer. ▪ There is an absence of perimeter landscaping along the side boundaries. ▪ The perimeter retaining wall along the eastern boundary is not sufficiently designed given the site constraints. 	<p>Additional planting is provided along the western boundary and around the visitor space to soften the built form. The retaining walls have been designed by a qualified (RPEQ) engineer.</p>
<p>Geotechnical and excavation impacts</p>	
<ul style="list-style-type: none"> ▪ No geotechnical report has been provided despite substantial excavation and known hard rock on the site. ▪ Excavation against the existing rear retaining wall risks weakening the wall and a potential future collapse. ▪ Rock breaking and excavation close to boundaries may cause noise, vibration and structural damage to adjoining homes. ▪ Submitters do not consent to enabling works occurring within their properties. 	<p>A geotechnical report is not a specific requirement as part of the development application process, however, appropriate soil testing and geotechnical assessment undertaken by suitably qualified engineers will form part of the next stage of the development process during detailed design. Further compliance can be appropriately conditioned by Council.</p> <p>Appropriate measures will be put in place to protect existing adjoining structures during construction. Importantly, the management, construction and the mitigation of external impacts (including that of dust, noise and vibration etc.) of the project will be considered as part of the required Construction Management Plan. This can be appropriately conditioned by Brisbane City Council.</p>
<p>Sewer line location</p>	
<ul style="list-style-type: none"> ▪ The civil drawings show the existing sewer in the wrong location; it is much closer to the common boundary than shown. ▪ It is unclear whether the townhouses and retaining walls can be built on the boundary without affecting the sewer. ▪ Rock breaking and excavation near the sewer may cause damage to the pipeline. 	<p>Services outside the site are shown from Council mapping and survey data. The townhouses and retaining walls can be built as shown, with existing infrastructure protected during construction and relevant Build Over Approvals to be obtained where required during detailed design. Construction impacts will be managed as part of the required Construction Management Plan.</p>
<p>Traffic, access and safety</p>	
<ul style="list-style-type: none"> ▪ The site is on a narrow part of the road behind a blind corner, and the development creates a safety risk for manoeuvring vehicles. 	<p>The development of four (4) townhouses generates a very low volume of traffic, and the access and parking have been designed in accordance with Council's requirements and the relevant Australian Standards. Driveway sightlines are maintained through a truncation of the deep planting on the exit side, providing the required pedestrian sight line.</p>

<ul style="list-style-type: none"> Sightlines at the driveway entry are impacted by the proposed bin enclosure and retaining walls, raising safety concerns. 	
<p>Adequacy of the Information Request response</p>	
<ul style="list-style-type: none"> The applicant has not adequately responded to Council's Information Request, particularly regarding setbacks, landscaping and building separation. The amended built-to-boundary wall along the eastern boundary still exceeds 3m and does not specify a finish or landscape buffer. 	<p>A full response to Council's Information Request was provided, including amended architectural, traffic, landscape and civil plans addressing setbacks, building separation, landscaping, privacy and the boundary wall. The eastern boundary wall is largely below ground, with only a minor portion above ground level, and functions as a retaining wall managing the natural fall of the site.</p>
<p>Site presentation and maintenance</p>	
<ul style="list-style-type: none"> Existing vegetation and trees have been removed and the site left unmanaged. Significant earthworks costs may lead to a value-engineered outcome that compromises the quality of finishes and landscaping. 	<p>The presentation and ongoing maintenance of the site is not a planning assessment matter and is managed by the engaged contractor and managing agency. The quality of the engineering works is likewise not a planning consideration, with all civil works to be designed and certified by a qualified (RPEQ) engineer.</p>

In summary, whilst we acknowledge the concerns raised by submitters, particularly when considering the common themes such as privacy & overlooking, building bulk and earthworks, we maintain that the development as proposed continues to satisfy the relevant assessment benchmarks as detailed in the *Brisbane City Plan 2014*, addresses a demonstrated local planning need and will deliver a contemporary, high-quality and purpose-built townhouse development in a well-located area.

Accordingly, it is recommended that Council approve the development application subject to the standard conditions of approval for a new Multiple dwelling within the Low-medium density residential zone.

Should you wish to discuss this matter further, please do not hesitate to contact me at the office on (07) 3361 9999.

Yours faithfully
TOWN PLANNING ALLIANCE PTY LTD



Tom Kedda
PRINCIPAL PLANNER