

24 March 2026

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

GPC Job Reference: 25.2477

Attention: Dominic Hudson (Urban Planner)

Dear Dominic,

RE: SUMMARY OF SUBMISSIONS RECEIVED DURING PUBLIC NOTIFICATION AT 43 VILLIERS STREET,
NEW FARM QLD 4102 (APPLICATION REFERENCE: A006924087)

1. INTRODUCTION

The applicant has undertaken public notification in accordance with Chapter 1, Part 4 of the Development Assessment Rules (version 3.0 under section 68 of the *Planning Act 2016*) for the development application seeking a development permit for a material change of use and development permit to carry out building work for a multiple dwelling (5 units) in the traditional building character overlay.

Public notification was undertaken between 2 March to 20 March 2026 and a Notice of Compliance with Public Notification Requirements was issued to Council on 23 March 2026. Following the conclusion of the notification period, a total of 21 public submissions were received, including 12 in support and 10 opposing the proposal. A response to the key matters raised in the submissions is provided below.

2. RESPONSE TO PUBLIC SUBMISSIONS

Submission Item	Applicant's Response
Excessive height, bulk and scale / overdevelopment	
Some submitters contend the proposal is too large for the site and inconsistent with the	The submitter's characterisation of the proposal as an excessive four-storey building is not accepted. While part of the basement is technically defined as a storey, it is a subordinate, non-habitable parking level and does not materially contribute to the building's perceived height or bulk. Above

<p>surrounding two-storey context.</p>	<p>natural ground, the built form primarily remains under 11.5 metres (Excluding rooftop).</p> <p>The proposal does not present as a full four-storey building in the streetscape. It provides a two-storey presentation to Villiers Street, with the upper level recessed, and a three-storey presentation to Charles Street that responds to the site's fall. Rooftop elements are centrally located, well setback and visually recessive.</p> <p>The site is within the Low-medium density residential zone, 2 or 3 storey mix precinct, and the New Farm and Teneriffe Hill neighbourhood plan, where low-rise multiple dwellings are anticipated. The locality also contains a mix of dwelling types, including existing multi-unit development.</p> <p>Accordingly, the proposal does not represent overdevelopment of the site. It is a well-articulated low-rise infill outcome that is consistent with the intended character and scale of development in this locality.</p>
<p>Housing supply and appropriate infill</p>	
<p>Supporters say the site is suitable for additional medium-density housing given its proximity to services, public transport and the Riverwalk.</p>	<p>Support for the proposed infill housing outcomes are acknowledged.</p>
<p>Setbacks, separation and transitions</p>	
<p>Some concerns relate to whether the proposal provides adequate side/rear setbacks or building separation, and the resulting interface with adjoining houses.</p>	<p>The Information Request response confirms that side boundary landscape buffering has been increased, balconies facing boundaries have been amended to incorporate screening and improved separation, and additional sections and privacy diagrams were provided to demonstrate that privacy is maintained.</p> <p>Importantly, the proposal is on a corner site and must be assessed having regard to its particular context, not solely against a numerical acceptable outcome. The design incorporates articulation, upper-level recession and landscaping within setback areas to soften the interface with adjoining sites and reduce perceived bulk.</p> <p>The building mass has been carefully modulated through varied setbacks, recessed upper levels and integrated planting to achieve a lighter built form and a compatible interface with the surrounding low to medium density residential character.</p>
<p>Amenity impacts</p>	
<p>Submitters raise concerns about overlooking, loss of privacy, overshadowing, and reduced natural light and breezes.</p>	<p>In response, the proposed development has been deliberately designed with a range of built form and screening measures to minimise direct overlooking and protect the amenity of neighbouring premises. These measures include setbacks, screening treatments, planter boxes, high sill windows, opaque glazing, landscaping and boundary treatments, all of which work together to reduce opportunities for unreasonable views into adjoining private areas.</p>

47 and 49 Villiers Street

- Carparking level – Built-to-boundary walls
- Unit 2 – fixed landscape planters
- Unit 4 – high sill windows
- Unit 5 – opaque glass and fixed landscape planters
- Rooftop – extensive setback, balustrade and fixed landscape planters

20 Charles Street New Farm

- Carparking level – in-ground landscaping deep planting, boundary fencing
- Unit 1 – opaque glass and in-ground landscaping
- Unit 3 – opaque glass and fixed landscape planters
- Rooftop – extensive setback, balustrade and fixed landscape planters

These design measures ensure that any interface with adjoining properties is appropriately managed and that the potential for adverse privacy impacts is substantially reduced.

In terms of overshadowing, shadow diagrams have been prepared for both the winter and summer solstices. These demonstrate that the proposal would not result in unacceptable or unreasonable shadow impacts on adjoining premises. While some additional shadowing is an inevitable consequence of urban infill development, the extent of shadowing generated by the proposal is not considered excessive and remains consistent with the reasonable expectations for a multiple dwelling development on an inner-city site.

More broadly, it is noted that some change in outlook, light access and breezes is an inherent consequence of redevelopment within a low-medium density urban area. The relevant question is not whether there is any change at all, but whether the resulting impacts are unreasonable. In this instance, having regard to the design response and the proposed measures, it is considered that the development maintains an appropriate level of amenity for adjoining properties and does not give rise to unacceptable adverse impacts.

Traditional building character

Objectors say the proposal does not complement the traditional tin-and-timber streetscape of Villiers Street.

The design has been refined to better reflect the fine-grain character of surrounding pre-1946 dwellings through increased façade articulation, recession of the uppermost level, enhanced balcony and wall modulation, and landscaping that softens the built form within the street interface. In particular, the proposal is intended to read primarily as two storeys to Villiers Street, with upper levels visually recessed.

It is also important to assess the proposal in its actual context. While Villiers Street and the surrounding area contain traditional character dwellings, the locality is not intact or uniform. Rather, it exhibits a mix of pre-1946 houses, post-war dwellings, townhouses, walk-up flats and more recent infill development. The existing building on the site is itself a post-1946 dwelling that does not exhibit traditional building character and is not a defining element of the streetscape.

The proposal responds to this mixed context through a contemporary architectural outcome that references, rather than imitates, traditional

	<p>character. The use of articulated façades, strong horizontal elements, recessed upper levels, balconies, planter boxes and deep planting reflects the scale, rhythm and subtropical qualities of traditional Queensland development, while still presenting as a high-quality contemporary infill building.</p> <p>In planning terms the proposed development provides a compatible and well-resolved response to a mixed and evolving streetscape, and is considered to complement the traditional character values of Villiers Street.</p>
High-quality subtropical architectural design	
Supporters describe the proposal as a well-resolved Brisbane-style building with articulated built form, recesses, balconies and natural ventilation features.	Support for the proposed subtropical and architectural response are acknowledged.
Public realm and pedestrian benefits	
Supporters identify benefits from changes to access arrangements, pedestrian conditions and the streetscape interface.	Support for the proposed pedestrian benefits are acknowledged.
Streetscape improvement	
Supporters consider the proposal an improvement over the existing development and say it would provide a more attractive and better designed corner outcome.	Support for the proposed streetscape improvements are acknowledged.
Traffic, parking and local safety	
Objectors also raise existing parking stress and traffic impacts in the local area, particularly associated with nearby community uses and constrained local streets.	<p>In response, the proposal provides a level of on-site parking that is considered appropriate having regard to both the current planning scheme requirements and Council's emerging policy direction. Under the current planning scheme, Council requires a total of 10.5 resident spaces and 1.25 visitor spaces, which equates to 11 resident spaces and 2 visitor spaces when rounded, or 13 spaces in total.</p> <p>It is also relevant that Council has recently released draft planning scheme amendments under the <i>More Homes, Sooner – Car parking for Multiple dwellings</i> package, which reduce parking rates for multiple dwellings in well-located areas, including land within 400m walking distance of a District</p>

centre or high-frequency public transport. The subject site qualifies for these reduced parking rates under Council’s draft framework.

Applying those reduced rates, the proposal would require 8 resident spaces and 2 visitor spaces. The development proposes 12 resident spaces and 1 visitor space. While the allocation differs slightly from the conventional split between resident and visitor parking, the overall parking provision exceeds the total number of spaces that would be required under Council’s draft policy position for this highly accessible location.

A Traffic Engineering Report prepared and endorsed by an RPEQ has been submitted in support of the application. That report assesses the proposed parking supply and traffic outcomes and confirms that the development can be appropriately accommodated on the site without resulting in unacceptable traffic or parking impacts.

Accordingly, it is considered that the proposed parking provision is sufficient and that the development would not give rise to adverse traffic or parking impacts.

Landscape and greenery benefits

Support submissions refer to planting, greenery and a subtropical landscape response as positive attributes of the scheme

Support for the proposed landscaping and subtropical design outcomes are acknowledged.

Landscaping and deep planting deficiencies

Some submitters argue that the proposal provides insufficient softening of built form through deep planting.

The proposal has been amended in response to Council’s Information Request to strengthen the landscape outcome, including improved boundary landscaping and a deep planting area at the primary frontage intended to support meaningful canopy growth and soften the presentation of the building.

The deep planting area is located in natural ground, adjoins the verge, and benefits from permeable driveway treatment and site grading that directs water toward the planting zone. Although a performance outcome is sought to the acceptable outcome, the overhang above is approximately 5.58m high with open sides, allowing access to rainfall and sunlight and enabling long-term canopy development. Suitable species have also been selected for these conditions.

More broadly, the landscape response is not limited to one isolated planting area. A wider landscaping strategy incorporating deep planting, boundary planting, planter boxes, and rooftop landscape elements, which together soften the built form, reduce visual bulk, and improve the subtropical presentation of the development. Overall, the proposal provides 10.16% deep planting and 29.44% landscaping across the site.

Accordingly, the proposal provides an appropriate landscape response that is capable of softening the built form and achieving a desirable visual outcome for the site.

Construction / excavation impacts

Some submissions express concern about excavation, vibration and impacts on adjoining older buildings and nearby heritage fabric.

These matters are construction-phase issues that can be appropriately managed through conditions of approval, rather than representing a basis to refuse the development. In this regard, Council can impose conditions requiring the preparation and implementation of a detailed Construction Management Plan addressing the site preparation, demolition, excavation and building phases of the project.

That plan can include specific management and mitigation measures relating to vibration, structural protection, construction methodology, and the management of potential impacts on adjoining and nearby properties. In addition, it would be appropriate for pre-construction dilapidation surveys to be undertaken for relevant adjoining properties so that the condition of surrounding buildings is properly documented before works commence.

Subject to the imposition of such reasonable and relevant conditions, it is considered that potential construction-related impacts can be satisfactorily managed and do not warrant refusal of the application.

Yours sincerely,



Simon Grice
Director