



Dedicated to a better Brisbane

30 September 2026

Gordon St Developer Pty Ltd
C/- Urbis Ltd
Level 32, 300 George Street
BRISBANE CITY QLD 4000

ATTENTION: Natalia Grodek
Application Reference: A007085778
Address of Site: 2A GORDON ST NEWSTEAD QLD 4006

Dear Natalia

RE: Information request in accordance with the Development Assessment Rules

Council acknowledges the strategic importance of the site within the Newstead Urban Enterprise Area (UEA), Brisbane's Inner City Strategy and the evolving Newstead precinct.

While the UEA anticipates some residential development, its primary role remains the delivery of employment-focused outcomes, including commercial, industrial, research, technology and other business activities that contribute to Brisbane's economic base. Accordingly, residential development should be balanced with, and not compromise, the long-term function of the precinct as a significant employment area.

The proposal seeks a 34-storey tower, however, the planning merits for the extent of the proposed height require further demonstration. Council considers that additional building height and density may be supported where there is a clear planning rationale and where the development delivers a commensurate public benefit through exceptional design outcomes. This may include, but is not limited to, meaningful public realm improvements, a highly permeable and flood-responsive ground plane, subtropical design excellence, substantial landscape outcomes, improved pedestrian connectivity and a built form that positively contributes to the character and function of the precinct.

The proposal introduces a substantial quantum of sensitive residential uses into an area that continues to function as, and is intended to remain, an important employment precinct. While the long-term evolution of the UEA may accommodate some residential activity, the proposal has not adequately demonstrated how future residents will be protected from the impacts of surrounding industrial, commercial and employment-generating uses, nor how the development will avoid creating reverse amenity pressures that may constrain the ongoing operation, expansion or future establishment of those uses. Particular consideration should be given to ensuring that any transition from employment-focused activities to a more mixed-use precinct occurs in a manner that protects both existing businesses and future residents.

While Council considers there may be merit in pursuing a high-density mixed-use outcome on the site, the proposal has not yet demonstrated that the current scale, built form, land use mix and public benefits represent the most appropriate planning outcome for the site. The following comments identify opportunities to revise and improve the proposal.

Building Height – Tower and Podium

- 1) The proposed development, comprising a 34-storey tower and 6-storey podium, exceeds the height outcomes anticipated by the Newstead North Neighbourhood Plan Code. A greater height than envisaged for the site may have merit where it delivers a commensurate public benefit, design excellence and flood-responsive outcomes, the proposal has not sufficiently demonstrated these outcomes. Further, the scale, bulk and visual prominence of the podium have not been adequately justified having regard to the surrounding context, including existing and emerging podium forms within the locality. Whilst Council acknowledges the challenges associated with accommodating parking above flood levels, further work is required to reduce the visual dominance of the podium and demonstrate a more active, fine-grain and pedestrian-oriented streetscape outcome through improved activation, landscaping and interface treatments. Further information and amended plans are therefore requested that:
 - a) Reconsider the height and scale of the tower and demonstrate a built form outcome that is more appropriately aligned with the strategic intent and character outcomes sought for the precinct.
 - b) Review the height, bulk and presentation of the podium and demonstrate a more contextual response to surrounding development.
 - c) Provide a detailed podium and streetscape contextual analysis, including existing and approved developments within the locality, to justify the proposed podium height and scale.
 - d) Demonstrate how the additional height delivers a commensurate public benefit through improved public realm outcomes, flood resilience, subtropical design, landscaping, pedestrian connectivity and architectural excellence.
 - e) Incorporate additional active uses and activation opportunities within the podium frontage and lower podium levels.
 - f) Demonstrate that overshadowing impacts on existing parkland and privately owned publicly accessible open space are minimised.
 - g) Refine the tower and podium façades to reduce perceived bulk and scale and improve their response to surrounding streets and public spaces.
 - h) Further investigate opportunities for a more activated and permeable ground plane, including additional interaction between retail uses, landscaping and the public realm.
 - i) Provide detailed streetscape elevations, urban design analysis, and 1:20 / 1:50 sections and elevations of the ground floor and podium interfaces demonstrating the proposed activation, public realm response and pedestrian experience.
 - j) Ensure facades are broken up into smaller components that address adjoining street frontages and respond to the wider streetscape context.

Sensitive use in Industry Zone/ Reverse Amenity

- 2) The proposal introduces a substantial quantum of sensitive residential uses within the Low impact industry zone and the Newstead Urban Enterprise Area (UEA). It is not sufficiently demonstrated that the scale of residential development proposed will maintain the intended employment function of the precinct or avoid reverse amenity impacts that may constrain the ongoing operation, expansion or future establishment of surrounding industrial, commercial and employment-generating uses. In accordance with the Strategic Framework, the Industry zone code:
 - a) Provide further information demonstrating that the proposed residential uses are appropriately located and designed to achieve an acceptable standard of environmental amenity for future occupants whilst avoiding reverse amenity impacts on existing and future employment-generating uses within the precinct.

- b) Demonstrate how the proposal maintains and supports the long-term economic and employment function of the Urban Enterprise Area, having regard to its role as an inner-city employment precinct associated with Brisbane's Knowledge Corridor.
- c) Demonstrate that the proposal will not unreasonably constrain the ongoing operation, expansion or future establishment of surrounding industrial, commercial, research, technology and other employment-generating activities.
- d) Provide supporting technical assessments, where relevant, addressing potential impacts from surrounding industrial, commercial and employment-generating activities,

Pied-à-terre

- 3) The proposal material has not provided sufficient information to understand the nature, operation and planning implications of the 'Type A and B' Pied-à-terre accommodation types.
 - a) Provide further information to clarify the intended use and operational characteristics of the proposed Pied-à-terre accommodation. Identify who may occupy the accommodation, the anticipated length of stay and whether occupation is intended to be permanent, temporary or ancillary to another use.

Building Site Cover and Setbacks

- 4) The proposal site cover exceeds the maximum site cover in the Multiple dwelling code. The site cover in conjunction with limited frontage setbacks provided along the three street frontages, is not considered to comply with assessment benchmarks of City Plan.

In accordance with AO7.4, AO18/PO7, PO18 of the Newstead north neighbourhood plan, AO8/PO8 of the Multiple dwelling code and AO25 and AO26 of the Centre or mixed use code:

- a) Provide increased setbacks along street frontages and reduce site cover of the tower to increase opportunities for deep planting.

Ground Floor Activation and Flood Responsive Design

- 5) Whilst the proposal has incorporated raised ground-level commercial tenancies, landscaping and public realm elements, Council considers there is an opportunity to further strengthen the relationship between flood-responsive design and ground floor activation. In particular, the proposal has not sufficiently demonstrated how the ground plane contributes to a vibrant public realm outcome, responds to the nearby waterfront park setting, and positively integrates flood resilience, public accessibility and streetscape activation.

Further information is requested that addresses the matters raised above and demonstrates how the proposal has been amended to better align with the strategic intent of the Urban Enterprise Area, improve public realm and flood-responsive outcomes, and justify the proposed height, scale and intensity of development, including the following:

- a) Provide detailed sections and elevations (1:20 / 1:50 scale) of the ground floor, street activation areas and public realm interfaces.
- b) Demonstrate how the ground floor commercial tenancies, public realm and landscape areas are designed to accommodate and recover from flood events, including consideration of flood-adaptable retail frontages, terraced public realm spaces and the arrangement of critical building infrastructure.
- c) Demonstrate how the ground plane has been designed to facilitate the movement of floodwaters through the site whilst maintaining a high-quality pedestrian environment.
- d) Demonstrate how the ground-floor design improves integration with the adjoining waterfront park, public realm and pedestrian network.

- e) Consider incorporating protrusion and overhanging of retail spaces beyond the proposed tiered landscape edge to improve activation, enclosure and engagement with the public realm.
- f) Demonstrate how the proposal delivers a meaningful public benefit through an active, permeable and subtropical ground plane that is commensurate with the scale of development proposed.

Private Open Space

- 6) While individual units are afforded private open spaces in form of a balcony, it is noted, some of the Type B Pied-a-Terres don't have balconies. Some of the proposed balconies do not satisfy the minimum requirements with some balconies being irregularly shaped with reduced areas. In accordance with AO31.1 of the Multiple dwelling code:
 - a) Provide private open space of a minimum of 12sqm.
 - b) Ensure private open spaces contain an area of at least 3m clearance to all sides.

Subtropical Design

- 7) The proposal incorporates operable components of the glazed façade. However, more detailed elevations and plans are required to fully understand the location and size of these openings. All habitable rooms of the proposed development must include a minimum of 2 dual aspect windows or openings to satisfy acceptable outcomes of the Multiple dwelling code. It is noted the depths of the windows, particularly the 2 bedroom units facing Waterloo Street will need to demonstrate access to sunlight and natural heating, cooling and ventilation for residents can be achieved.

In accordance with AO26.1 of the Multiple dwelling code:

- a) Provide amended drawings demonstrating location of all window and door openings.
- b) Provide typical detail sections through windows and detailed façade elevations to describe types of windows and opening dimensions.
- c) Provide further details through sections of void space (Gridline F, D, and B) and any window openings to units.
- d) Provide further information regarding proposed weather protective shading devices including typical detailed sections with dimensions of overhang / slab projections / shading devices.

Deep Planting

- 8) The proposal includes only one large subtropical shade tree within the deep planting area at the rear of the site. The extent of deep planting does not adequately support the establishment of large subtropical shade trees that, at maturity, would be complementary in scale and height to the proposed built form.

The quantity and quality of deep planting proposed does not sufficiently mitigate these impacts of the proposed built form or satisfy the relevant performance outcomes.

To demonstrate compliance with PO30, PO41, PO55 and PO56 of the Centre and mixed use code, and PO6 and PO7 of the Newstead north neighbourhood Plan, provide the following design amendments:

- a) Provide expansive deep planting areas at the basement, ground plane and podium along street frontages. Incorporate additional deep planting opportunities along the rear boundary to create an improved building height transition and interface with the low-impact industry developments to the north.

- b) Provide additional large subtropical shade trees that, at maturity, will achieve a scale and height complementary to the proposed podium.
- c) Demonstrate, through sections and elevations, how deep planting areas within the site will effectively soften the visual impact of the built form when viewed from the public realm and adjoining properties, both existing and future.
- d) Retain existing street trees located along Waterloo Street.
- e) Provide additional landscaping within the planters located on the podium levels to achieve additional screening.

Streetscape Interface

- 9) The significant level difference proposed between the street and the active-use frontages raises concerns regarding the development's ability to achieve a high level of activation and positively contribute to the public realm.

It has not been adequately demonstrated that the proposed landscape treatment will effectively soften and screen the level change or provide a high-quality green edge that integrates the active uses with the streetscape.

To demonstrate compliance with PO6, PO7 and PO8 of the Newstead north neighbourhood plan code, and PO55 and PO58 of the Centre and mixed use code, provide the following design amendments:

- a) Demonstrate through detailed sections and elevations, how landscaping will effectively soften the level difference between street level and the active uses. Where blank walls are proposed, incorporate planting that will achieve full vertical coverage of the wall at maturity.
- b) Demonstrate the provision of outdoor dining areas, operable windows, and openings to the streetscape in accordance with the *Street Activation* and *City Room* outcomes.
- c) Consider opportunities to implement small shade trees within containerised planters along the street edge to enhance visual interest and cast shade onto the verge.

Verge Widening

- 10) The proposed retention of the existing verge widths along Byres Street and Gordon Street is not supported. The significant increase in density proposed by the development will generate a corresponding increase in pedestrian demand, warranting the provision of a streetscape typology consistent with a Centre Street Minor outcome. This includes the provision of a 2.4m wide unobstructed footpath and large shade tree planting on all applicable verges.

- a) To demonstrate compliance with PO1 and PO2 of the Streetscape hierarchy overlay code, provide verge widening to achieve a consistent 3.75m wide verge along the full frontage of Byres Street and Gordon Street.

Substation

- 11) Additional information is required to demonstrate that the substation and associated infrastructure will not necessitate flood-free access arrangements within the verge that compromise the intended streetscape outcome, including verge crossfalls and longitudinal grades that comply with accessibility requirements and Council standards.

To demonstrate compliance with PO1 and PO2 of the Streetscape hierarchy overlay code, and PO1 and PO4 of the Infrastructure design code, provide the following information and design amendments:

- a) Demonstrate how the proposed substation will be designed in accordance with the Electricity Network Distributor's design requirements and achieve a streetscape outcome incorporating a 1 in 50 crossfall and a consistent longitudinal grade that

matches the adjacent road, in accordance with the Infrastructure design planning scheme policy.

- b) Provide written justification from a suitably qualified RPEQ Engineer confirming that the substation requirements will not conflict with the delivery of streetscape works in accordance with the Infrastructure Design Planning Scheme Policy.

Road dedications

12) In accordance with PO3 of the Road hierarchy overlay code and AO1 and Infrastructure design code:

- a) Provide revised plans demonstrating a non-trunk dedication for a 6m x 3 chord truncation at the corner of Gordon Street and Waterloo Street. Ensure all improvements (including basement extents) are outside the area of the dedication.
- b) Provide revised plans demonstrating a non-trunk dedication for a 6m x 3 chord at the corner of Byres Street and Waterloo Street. Ensure all improvements (including basement extents) are outside the area of the dedication.

Access

13) The RPEQ Traffic report prepared by Modus outlines two cross-overs are proposed to the site. While the two cross-overs could be supported in this instance to aid in minimising the interaction of passenger vehicles and service vehicles, the cross-over splay dimensions and cross-over types have not been detailed on the plans. In accordance with PO3 of the Transport, access, parking and servicing (TAPS) code:

- a) Provide a revised plan detailing the cross-over type and splay dimensions.

Parking Provisions

14) The proposal provides 360 on-site car parking spaces for residents and 11 spaces for visitors. While this exceeds the maximum resident parking provision by 23 spaces, it results in a shortfall of five visitor parking spaces.

The RPEQ Traffic Report prepared by Modus seeks to justify this shortfall on the basis that the surplus resident parking spaces can accommodate the unmet visitor parking demand. However, as the additional resident parking spaces are allocated to individual units, there is no certainty that they will be available for visitor use. The proposed exceedance of maximum residential carparking supply and reduced visitor parking provision is not supported and is inconsistent with the requirements of Table 13 (Car parking standards in specific cases) of the TAPS Planning Scheme Policy (PSP). In accordance with PO12 of the TAPS code:

- a) Reallocate 5 resident parking spaces to visitor parking.
- b) Provide on-site residential carparking that achieves compliance with the maximum rates prescribed in Table 13 of the TAPS PSP.

Bicycle parking provision

15) The proposal provides 102 resident and 26 visitor bicycle parking spaces where 305 resident and 77 visitor bicycle parking spaces are required to comply with Acceptable outcomes of the TAPS code.

The RPEQ traffic report prepared by Modus proposes a lower bicycle parking rate of 1 resident space per 3 dwellings and 1 visitor space per 12 dwellings in accordance with AustRoad Guidelines which is not sufficient for the development site. This outcome is not consistent with the intent of the planning scheme to encourage and support a greater share of trips by active travel, in particular in the inner city (noting the site is within the City Core). Given this the resident/visitor bicycle use would likely be significant, and demand for bicycle parking high. In accordance with AO5 of the TAPS code:

- a) Revise the proposal to align the bicycle parking provisions with TAPS PSP rates.

Refuse

- 16)** The proposal includes Centre activities which may include Health care services that produce regulated or related waste. Sufficient demonstration that correct storage of this stream has been considered and designed for must be provided.

Further, Council core services include general refuse, commingled recycling and green waste. To support sustainable development and landfill diversion, Council encourages the use of its green waste service. If the development is proposing to utilise the green waste service from Council:

- a) Provide amended architectural plans clearly demonstrating a separate regulated waste storeroom (within a building), or regulated waste enclosure (roofed and fully screened) has been provided for the proposed Centre activities uses if involving any Healthcare Service use/s.

Note: This item can be satisfied by providing amended architectural plans showing the indicative location of the regulated waste/clinical waste bins within each tenancy.

- b) Provide amended architectural plans clearly demonstrating sufficient storage and kerbside presentation area for the required number of 240L green waste mobile garbage. Refer to:

<https://www.brisbane.qld.gov.au/content/dam/brisbanecitycouncil/corpwebsite/about-council/documents/waste-management-technical-notes.pdf.coredownload.pdf>

Proposal Plans

- 17)** The proposal Architectural drawings does not include a North 3D perspective drawings. As a result, it is unclear how the development responds to the adjoining industrial land uses and whether the northern interface appropriately mitigates visual and amenity impacts. Based on the submitted information, the northern podium interface appears visually bulky and overbearing, presenting as a large blank wall with limited articulation. The proposal also does not sufficiently demonstrate the practicality, establishment and long-term maintenance of landscaping proposed along this interface.

- a) Revise plans to include North 3D perspective drawings demonstrating the northern interface of the development.
- b) Revise northern interface incorporating additional balconies, shading devices, operable elements and architectural detailing, particularly to the pied-à-terre's facing north.

Urban Utilities (UU)

Council does not undertake water and sewer assessment of any planning applications. Contact UU on (07) 3432 2200 to discuss any water and sewer issues and whether you are required to submit an application to UU for assessment.

Responding to this request

Your response should include a summary table which outlines any changes to performance outcomes and plans that have resulted from addressing the issues outlined above. The table should also include details of any supporting documentation.

If a response is not provided within the prescribed response period of three (3) months assessment of the application will continue from the day after the day on which the response period would have otherwise ended.

Email your response to DSPlanningSupport@brisbane.qld.gov.au quoting the application reference number A007085778.

Please phone me on the telephone number below during normal business hours if you have any queries regarding this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Avishek Paul', with a horizontal line underneath.

Avishek Paul
Senior Urban Planner
Planning Services North
Phone: (07) 31782151
Email: Avishek.Paul@brisbane.qld.gov.au
Development Services
Brisbane City Council