

25 August 2026

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

Attention: Chris Dixon – Senior Urban Planner

Dear Chris,

Response to Further Advice for Development Application at 837–857 Waterworks Road, The Gap (Council Ref.: A007011234)

On behalf of *Aura Holdings Pty Ltd* ('the Applicant'), please find below response to the further issues requested by Brisbane City Council ('Council') in relation to the Development Application at 837 Waterworks Road, The Gap (Council Ref.: A007011234).

At the outset, the Applicant thanks Council for its assessment and consideration of the proposed development to date. Since the issuing of the abovementioned Further Issues letter, the project team have undertaken further investigations and design reviews to ensure the development further aligns with the intent of the Planning Scheme.

The response is accompanied by the following supporting information:

- **Attachment A** – Revised Architectural Drawings, prepared by Cox Architecture;
- **Attachment B** – Architectural Perspectives and Renders, prepared by Cox Architecture;
- **Attachment C** – Virtual Brisbane Model, prepared by Cox Architecture;
- **Attachment D** – Revised Landscape Concept Plan, prepared by Place Design Group;
- **Attachment E** – Arborist Report, prepared by Treescience;
- **Attachment F** – Revised Waste Management Plan, prepared by Rhodium;
- **Attachment G** – Traffic Technical Memo, prepared by Urbis; and
- **Attachment H** – Revised Needs Assessment, prepared by Urbis.

The following provides a response to the matters outlined within the Council further advice notice.

Building Height

1. The proposal seeks a performance outcome for building height for the site. Whilst thoughtful siting and design of the proposed retirement living facility is acknowledged, the site is zoned sport and recreation and is surrounded by areas zoned low density residential characterised by predominately 1-2 storey development and open landscaped areas. Therefore, further information is required to demonstrate the proposed height ranging from 7 storeys towards Waterworks Road, to 9 storeys at the rear, achieves sensitive transitions in height towards the boundaries and is not visually dominant from key vantage points and the existing streetscape.

To assist Council's assessment,

- a. In accordance with PO8 of the Retirement and residential care facility code, provide visual analysis including further perspectives and photo montages, demonstrating the visual integration of the development within its surrounding context. The analysis should include but not limited to, views from key focal points, views from residential properties and public vantage points along Waterworks Road, Payne Road and Bennett Road.
- b. Demonstrate the building height is commensurate with the height of existing mature street trees (including established gum trees) and significant vegetation on the site and how this vegetation contributes to mitigating the visual prominence of the development.
- c. Provide further justification demonstrating that the proposed height and massing will not adversely impact the established character and amenity of the surrounding low density residential area.
- d. Submit a digital architectural model for input into Virtual Brisbane for review and analysis.

Response

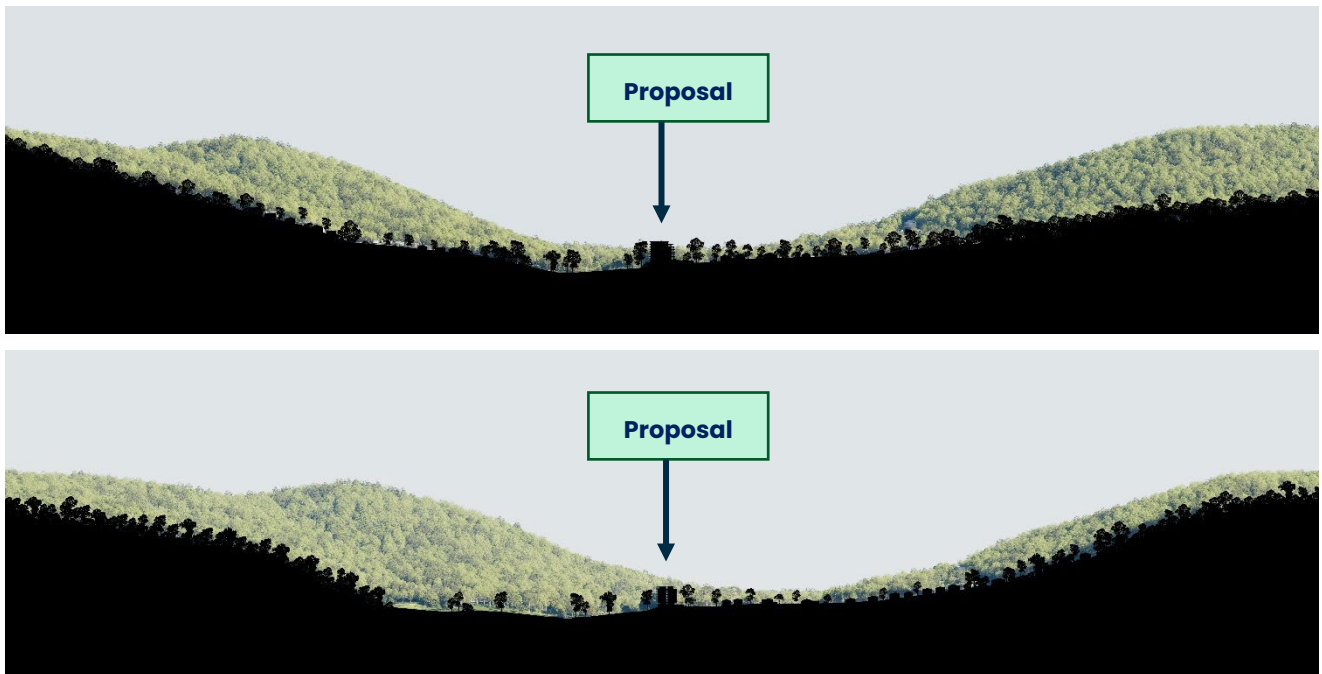
In response to Council's request, additional visual analysis comprising photomontages, perspectives and a digital architectural model for review through Virtual Brisbane has been prepared and provided as part of this response package. The visual material has been prepared from key public and residential vantage points surrounding the site, including views from Waterworks Road, Payne Road and Bennett Road, and incorporates both existing and proposed landscaping to accurately demonstrate the visual integration of the development within its surrounding context.

The built form incorporates substantial setbacks, articulated building forms, varied façade treatments and extensive landscaping which collectively reduce the perception of bulk and scale when viewed from surrounding streets and residential properties. Coupled with the existing vegetation on site, the proposed development integrates with the site and surrounding locality ensuring that the built form does not look out of place.

In response to Council's request regarding existing mature vegetation, the submitted sections demonstrate that the proposed building height is viewed within the context of the site's established landscape setting, including existing mature gum trees, significant retained vegetation and overall topography of the surrounding locality. The retained canopy vegetation provides a substantial visual foreground and backdrop to the development, assisting in softening views of the built form and mitigating its visual prominence. The proposed landscape outcomes further reinforce this character through additional deep planting and subtropical shade tree planting.

Eight perspectives have been created to provide a detailed understanding of the development's position and height context in comparison to the surrounding locality (see **Figure 2**). This is particularly relevant in assessing the visual prominence of the proposed height, as the development will not introduce an element that is materially higher than the established vegetated backdrop already experienced from surrounding viewpoints. The accompanying diagrams also demonstrate the relationship between the proposed built form, existing mature vegetation and surrounding topography, confirming that the perceived height of the development is moderated by the established landscape context.

Figure 1 – Building height relationship to existing vegetation and surrounding context



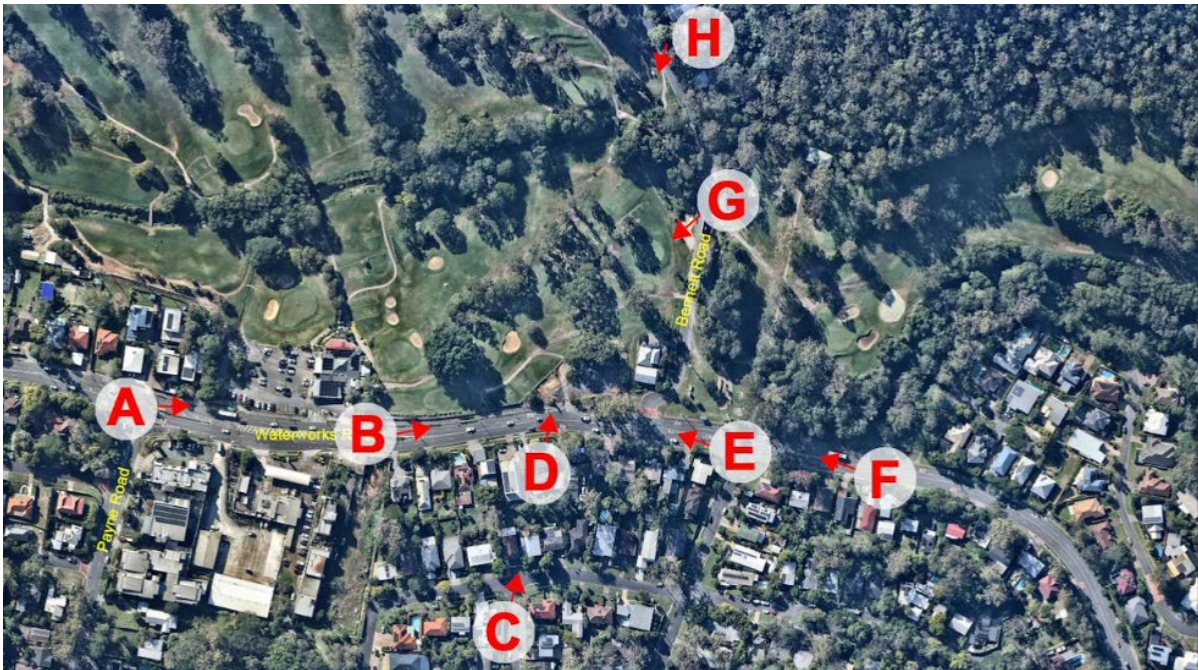
Source: Cox Architecture

The existing mature canopy provides a strong vertical landscape context which currently defines the visual character of the site and assists in screening longer range views. As a result, the proposed built form will be read against, and partially filtered by, existing vegetation of comparable or greater height, rather than presenting as an isolated or visually dominant built element within the streetscape or locality.

Further, the proposal positively contributes to the character of the streetscape and landscape through the retention of significant vegetation, provision of substantial landscape buffers, deep planting areas and the incorporation of additional large subtropical shade trees throughout the site. These measures ensure the development integrates appropriately with the established character of The Gap and maintains the amenity of surrounding residential properties.

The full suite of perspectives and renders can be viewed in **Attachment B**.

Figure 2 – Perspectives



Picture 1 – Perspective Map



Picture 2 – Perspective D with existing trees



Picture 3 – Perspective A with existing trees

Source: Cox Architecture

Building Length

2. The proposed buildings of 41 and 45m length exceeds AO11.2 of the Retirement and residential care facility code. Whilst there is a good degree of variation in the built form, further information is required demonstrating the building can be read as a series of buildings or provide opportunity for dual aspect windows to dwelling units. The length is to be demonstrated as keeping with the form and character of the area to meet PO11 of the Retirement and residential care facility code.
 - a. Provide further information demonstrating the design responses which have been incorporated to break up the building length.

Response

Whilst it is acknowledged that the proposed building lengths of approximately 41m and 45m exceed the prescribed AO11.2 of the Retirement and Residential Care Facility Code, the proposal clearly achieves PO11, which requires development to have a building depth and/or length that:

- contains a high level of modulation and articulation to ensure that the bulk of the development is in keeping with the form and character intent of the area;
- is read as a series of buildings through the use of distinct architectural forms;
- provides adequate amenity for building residents in terms of natural light and ventilation;
- does not adversely impact access to breezes, sunlight and daylight to adjoining premises;
- does not create wind tunnelling impacts on adjoining premises;

- provides opportunities for dual aspect dwellings;
- incorporates changes in material, finish or texture at regular intervals;
- provides expressive shadow casting elements; and
- provides opportunities for additional deep planting.

The proposed development has been designed as two distinct built form elements rather than a single continuous building, as shown in **Figure 3**. The image demonstrates that the building mass is clearly separated by a substantial central landscaped courtyard and breezeway, which creates a visual recess through the middle of the development and allows the two wings to be read independently. This separation, together with the curved and angled building forms, prevents the development from presenting as a long, uninterrupted wall of built form.

The image also illustrates the substantial variation in the building elevations, including recessed and projecting balcony forms, changes in façade alignment, varying solid and glazed elements, and differentiated material and colour treatments. These elements introduce regular vertical and horizontal breaks across the façades and provide expressive shadow casting, which reduces the perceived length and bulk of each wing when viewed from the surrounding area. The rounded balcony edges, varied balcony depths and changes in plane further assist in visually segmenting the building and reinforcing the appearance of multiple smaller building components.

Figure 3 – Site Plan



Source: Place Design Group

The building configuration also facilitates access to natural light and cross-ventilation for residents, including opportunities for dual-aspect dwellings and outlook over the central landscaped courtyard. The landscaped separation between the wings assists in maintaining visual permeability, supporting resident amenity and softening the overall built form presentation. Further, the separation of the building wings and the articulated architectural treatment minimise potential impacts on access to sunlight, daylight and breezes for adjoining properties and do not create wind tunnelling effects. Accordingly, the proposal satisfies the intent of PO11 notwithstanding the numerical exceedance of AO11.2.

Whilst it is acknowledged that the proposed building lengths of approximately 41m and 45m exceed the prescribed AO11.2 of the Retirement and Residential Care Facility Code, the proposal clearly achieves compliance with PO11 with extensive variation in façade, materiality, and landscaping throughout.

Building Variation and Subtropical Design

3. The proposed variation in the building materials and colours and subtropical design features is acknowledged, however further changes may be possible to reduce the appearance of building bulk and balance the height of the building with the neighbourhood and street character as per PO12 of the Retirement and residential care facility code. Including dual aspect windows to habitable rooms would reduce reliance on mechanical heating and cooling to provide for Brisbane's subtropical character and lifestyle as per PO26 of the Retirement and residential care facility code.
 - a. Consider amending the design to include an alternative balustrade typology to assist in providing a visual break to components of the building and reducing the extent of full height glazing to external walls instead increasing the proportion of solid wall.
 - b. Consider including dual aspect windows to bedrooms and habitable rooms.

Response

The proposed development has been carefully designed to balance the scale of the built form with the surrounding neighbourhood character and the outcomes sought by PO12 and PO26 of the Retirement and Residential Care Facility Code. The design incorporates a high level of architectural variation through recessed and projecting balconies, changes in façade alignment, varied glazing proportions, solid wall elements, curved balcony edges, material and colour variation, and landscaped edges. These elements collectively break down the apparent scale of the building, create regular shadow lines and depth across the elevations, and avoid the presentation of a single continuous or visually dominant building mass.

With respect to Council's suggestion regarding alternative balustrade typologies and reduced full-height glazing, the current façade composition is considered to already provide an appropriate balance between visual articulation, architectural quality and resident amenity. The glazed elements are not applied uniformly across the elevations, but are integrated with solid balcony upstands, blade walls, changes in materiality and recessed balcony forms. This provides visual relief and breaks up the external wall plane while maintaining strong access to daylight, outlook and passive surveillance for residents. The balcony forms also function as shading devices, assisting in tempering solar exposure and contributing to a subtropical architectural response. The proposal details three balcony treatment types including glass, rendered planters and metal balustrades ensuring the horizontal elements provide sufficient variation, as shown in **Figure 4**.

Figure 4 – Building Sections – Breezeway and Balconies



Source: Cox Architecture

With respect to PO26, the proposed building layout has been designed to maximise opportunities for passive amenity through building orientation, generous balcony areas, outlook to landscaped spaces and extensive window openings. The separation of the two wings by the central landscaped courtyard assists in promoting access to natural light, outlook and air movement through the development, while a number of apartments benefit from multiple aspects and outlooks, including dwellings oriented toward the golf course, landscaped edges and internal communal open space. While not all bedrooms incorporate dual-aspect windows, the proposal provides a high level of residential amenity and reflects Brisbane's subtropical design principles by supporting outdoor living, visual connection to landscape, daylight access and opportunities for natural ventilation.

Accordingly, the proposal is considered to appropriately satisfy the intent of PO12 and PO26 without requiring further amendments to the approved architectural design.

Needs Assessment

4. The housing needs assessment includes a large catchment area to assess housing need, which is different and larger than the catchment used for the Sport and recreation needs assessment. The area of Milton, Auchenflower and Toowong is not considered necessary in the catchment for assessing housing needs.
- a. Provide an amended Needs Assessment which refines the housing catchment to be the same as the Sport and recreation needs assessment.

Response

In response to Council's request, an amended Needs Assessment has been prepared by Urbis Ltd and provided at **Attachment H**. The revised assessment refines the housing catchment area to align with the catchment adopted in the Sport and Recreation Needs Assessment and addresses the matters raised by Council.

Irrigation Strategy

5. The proposal does not clearly demonstrate that adequate onsite water storage can be provided to support the proposed landscape measures on the site, including the significant quantity of containerised planting, and show the location of rainwater storage tanks.
- a. Amend the proposal and provide an Irrigation Strategy that outlines the requirements for the proposed stormwater harvesting and sufficient water storage methods, with reference to the Landscape works code (PO12, PO13 and PO15) and the Landscape design planning scheme policy.
 - i. Demonstrate the proposed irrigation application rates for the onsite landscape areas within the development which is calculated using the methodology within Section 6.1 – Table 3 of the Landscape design planning scheme policy;
 - ii. The stormwater harvesting capacity and water tank storage requirements to effectively irrigate the onsite landscape areas which is calculated using the methodology within Section 6.3 – Table 5 of the Landscape design planning scheme policy;
 - iii. The proposed size, capacity and location of the water storage devices to service the irrigation requirements of this development.

Response

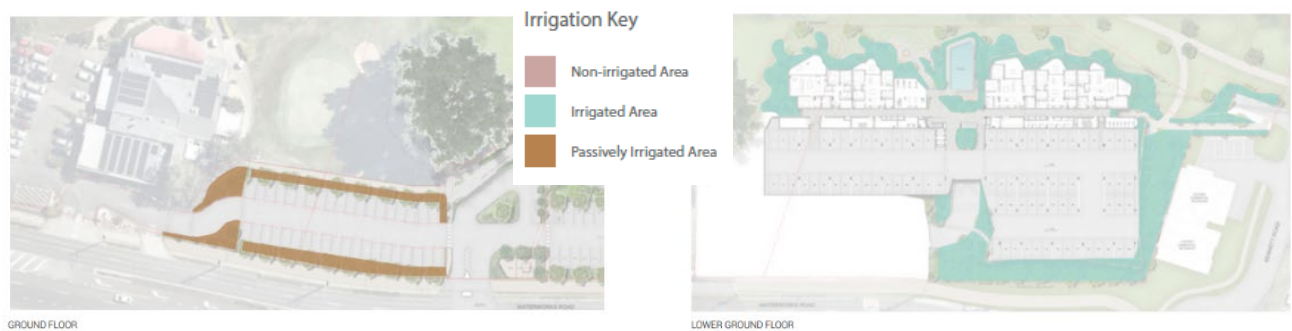
In response to Council's request, a revised Landscape Concept Plan prepared by Place Design Group has been provided at **Attachment D**. The revised plan includes an Irrigation Strategy which outlines the proposed stormwater harvesting, water storage and irrigation requirements for the development, including the location, size and capacity of the proposed rainwater storage infrastructure.

The proposal will include a 310,000L rainwater storage tank and 10m² stormwater filtration tank located within the basement level, which will provide water storage to support the ongoing irrigation requirements of the proposal. The revised Landscape Concept Plan identifies the proposed irrigated, passively irrigated and non-irrigated landscape areas throughout the development (refer to **Attachment D** and **Figure 5** below). The landscaping around the open air car park fronting Waterworks Road, will be passively irrigated, while the

landscape areas within the ground floor and lower ground floor are proposed to be actively irrigated. Landscaping associated with the Level 1 to Level 6 podium planter areas will also be irrigated.

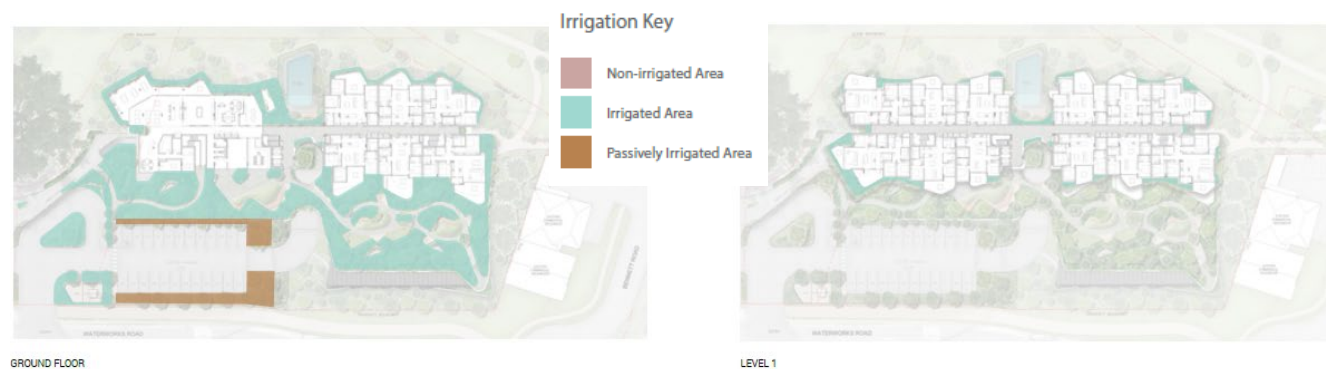
In addition to the rainwater harvesting system, the landscape design incorporates passive irrigation measures to support long-term plant establishment and reduce reliance on supplementary irrigation. This includes directing surface runoff from paved areas and driveways into adjoining landscape beds via flush kerb arrangements. The landscape areas are further supported by aerated soil conditions facilitated through perforated agricultural drainage pipes wrapped in geofabric, allowing water to infiltrate into the soil profile while preventing anaerobic soil conditions.

Figure 5 – Irrigation Strategy



Picture 4 – Ground Floor (Waterworks Road Carpark) and Lower Ground Floor

Source: Place Design Group



Picture 5 –Ground Floor and Level 1

Source: Place Design Group

Existing Vegetation

6. Insufficient documentation is provided to undertake an assessment of the proposed removal and interference of vegetation on site. Whilst an Arboricultural Impact Assessment is provided, this report only details the impact to the existing Significant Landscape Tree and does not provide an assessment of all impacted vegetation on site. The proposal is to mitigate adverse impacts to ecological features and visual amenity through the retention of significant vegetation in accordance with PO1 and PO3 of the Gap neighbourhood plan and PO8, PO28 of the Retirement and residential care facility code.
 - a. Provide an amended Arboricultural Impact Assessment (AIA) prepared by an AQF Level 5 Arborist that provides a full assessment of all vegetation removal and interference on site. The AIA is to include the following:
 - i. Botanical species name of trees;
 - ii. Height, diameter of tree trunk at breast height and crown diameter;
 - iii. General health assessment and character of trees including habitat values;
 - iv. Identification and illustration of the Tree Protection Zones (TPZ) and Structural Root Zones (SRZ) of trees in accordance with AS:4970;
 - v. Description of the proposed works and construction methodology to be used within TPZ of trees;
 - vi. Evaluation of proposed construction methodology and potential impacts on the trees;
 - vii. Evaluation of any pruning works (including canopy and/or root pruning) which may be required as a result of the proposed works;
 - b. Where vegetation removal is proposed, provide a canopy offset calculation and replacement planting plan that includes planting locations, species and stock sizes that ensures no net loss of canopy is achieved.

Response

In response to Council's request, an Arboricultural Impact Assessment (AIA) prepared by a suitably qualified AQF Level 5 Arborist has been provided at **Attachment E**. The amended AIA provides a comprehensive assessment of the existing vegetation across the site, including the vegetation proposed to be retained, removed or otherwise impacted by the development.

The AIA includes the relevant arboricultural information requested by Council, including botanical species names, tree dimensions, canopy spread, health and condition assessments, and the identification of Tree Protection Zones and Structural Root Zones in accordance with AS 4970. The report also assesses the extent of proposed works within or adjoining tree protection areas and provides recommendations for tree protection, construction methodology, pruning and supervision where required.

The amended assessment confirms that the proposal has been designed to retain significant vegetation where practicable and appropriately manage unavoidable vegetation impacts. Where vegetation removal is required to facilitate the development, this is offset through the revised landscape design and replacement planting strategy, which incorporates new canopy trees, layered planting and enhanced landscape buffers across the site. These outcomes will maintain and strengthen the vegetated character of the site, assist in

mitigating visual amenity impacts, and support compliance with PO1 and PO3 of The Gap neighbourhood plan code and PO8 and PO28 of the Retirement and residential care facility code.

Landscape Design

7. The Gap neighbourhood plan code and Retirement and residential care facility code require developments to achieve a high-quality design incorporating subtropical design principles including generous landscaping provisions. While the proposal indicates landscape buffers including deep planting areas, further documentation is required to ensure that the proposed landscaping achieves a high-quality multilayered planting design that supports visual screening of the built form and softening of hardstand areas required under City Plan 2014.
 - a. Provide an amended Landscape Concept Plan prepared by a suitably qualified Landscape Architect that includes sections throughout the site that clearly demonstrate the proposed landscape outcomes along the boundaries in relation to the proposed built form;
 - b. Include a minimum of 3 detailed planting plans of the proposed landscape buffers including adjacent to the open-air car parking, along the Waterworks Road frontage and along the eastern boundary. The plans are to include planting densities, stock sizes and a planting palette with a multilayered mix of fast-growing pioneer species and mature stock of slower growing species;
 - c. Include a preliminary maintenance schedule that details how the landscape buffers will be maintained to achieve full coverage of the planting areas within 2 years in accordance with PO8 of the Landscape work code;

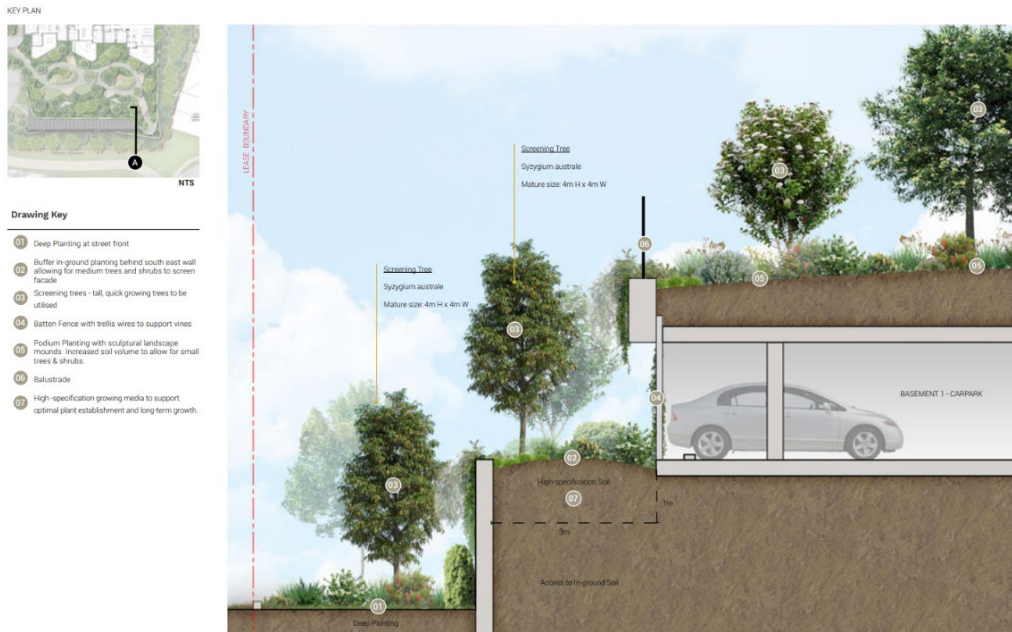
Response

In response to Council's request, a revised Landscape Concept Plan prepared by Place Design Group (Refer to **Attachment D**). The revised plan includes boundary landscape sections demonstrating the relationship between the proposed built form and landscape outcomes, together with detailed planting plans for the landscape buffers adjoining the open-air car parking area, the Waterworks Road frontage and the eastern boundary (Refer to **Figure 6**).

The proposed landscape design incorporates a diverse, multilayered planting palette comprising canopy trees, shrubs, groundcovers and climbers as detailed in **Attachment D** and in **Figure 7** below. The landscape buffers are designed to provide effective visual screening and softening of the proposed open air carpark. The planting design is supported by passive irrigation from adjacent paved areas, including runoff from the driveway via flush kerb arrangements, together with aerated soil conditions facilitated through subsurface agricultural drainage wrapped in geofabric to prevent anaerobic soil conditions and support long-term plant establishment.

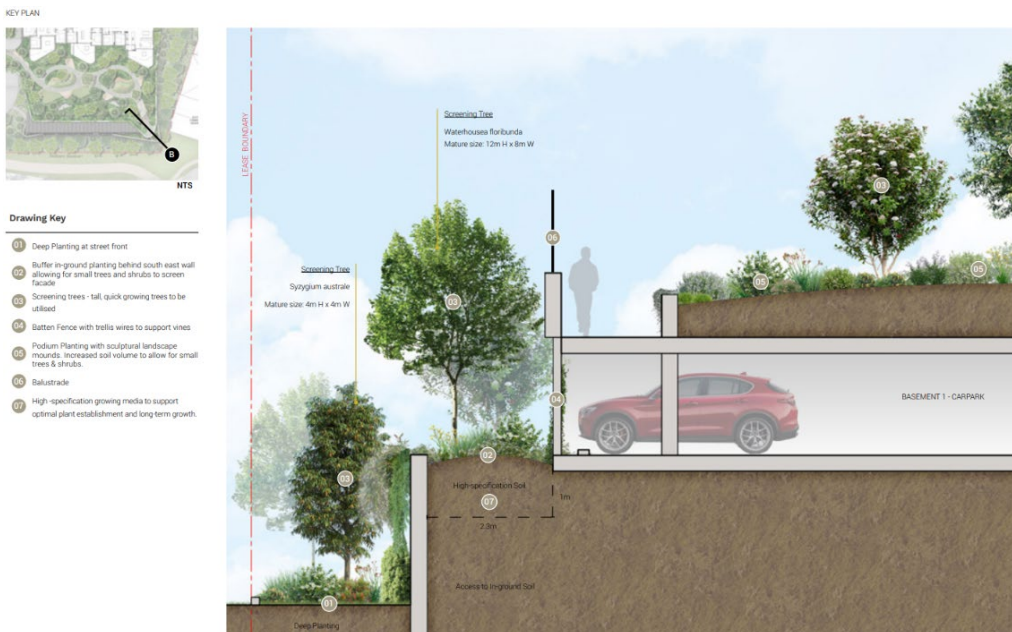
A preliminary maintenance schedule has also been provided outlining the establishment and ongoing maintenance requirements for the proposed landscape works. Collectively, these measures will deliver a high-quality subtropical landscape outcome that softens hardstand areas, reinforces the vegetated character of the locality and contributes positively to the amenity of adjoining properties and the streetscape.

Figure 6 – Proposed Landscape Buffers – Waterworks Road and Eastern Boundary



Picture 6 – Waterworks Road

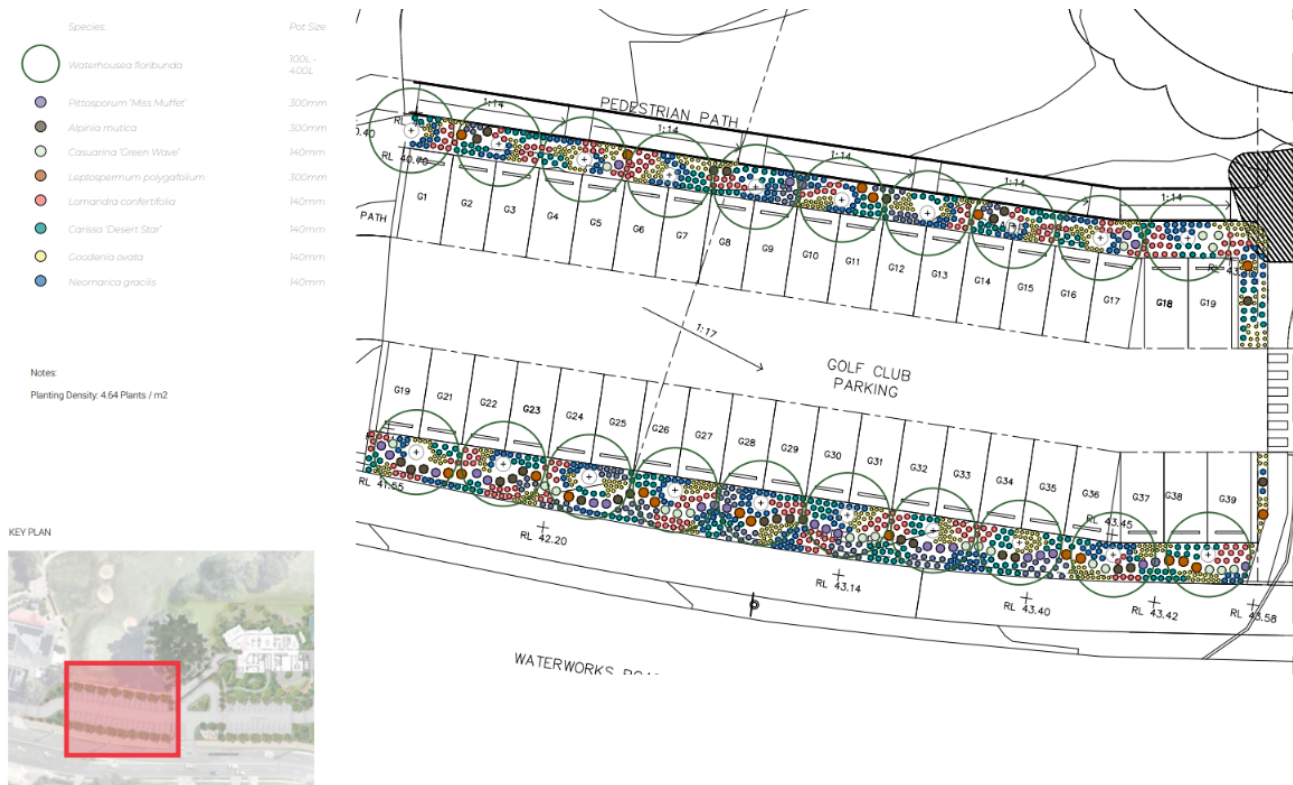
Source: Place Design Group



Picture 7 – Eastern Boundary

Source: Place Design Group

Figure 7 – Open air carpark planting palette



Source: Place Design Group

Landscape Design

8. The proposed open air car parking at the frontage of the site has the potential to create several amenity impacts including visual amenity, noise, odour, glare and heat island effects. Onsite car parking is to achieve a positive interface with the streetscape and adjoining sensitive uses through high quality landscape buffers that support subtropical design principles consistent with the local subtropical climate and reflect the suburban character of the area in accordance with PO2 of the Gap neighbourhood plan code and PO8, PO27 and PO33 of the Retirement and residential care facility code.
 - a. Demonstrate how the proposed shade tree planting will effectively shade the open air-car parking area by a minimum of 50% at maturity.

Response

The revised Landscape Concept Plan includes the proposed tree growth at maturity within the open-air car parking area, as shown in **Figure 8**. The proposed tree species have been selected to provide canopy cover and shade to the car parking area, while also contributing to a softened, landscaped frontage and supporting a subtropical design response. The diagram demonstrates that a minimum of 50% shading can be achieved based on the landscape species proposed

Figure 8 – Proposed Tree Growth at Maturity



INDICATIVE TREE CANOPY AT MATURITY

LEGEND	SCIENTIFIC NAME	COMMON NAME	MATURE SIZE H X W (M)
Symbol	Trees		
	TRISTANOPSIS laurina 'Luscious'	Water Gum	10 x 6
	WATERHOUSEA floribunda	Weeping Lilly Pilly	12 x 8

Source: Place Design Group

Figure 9 – Perspective from Waterworks Road



Source: Cox Architecture

The Water Gym and Weeping Lilly Pilly will reach mature heights of 10 to 12 metres total. **Figure 9** above provides a visual representation of the proposed buffer landscaping once matured indicating that the carpark will not be visible once the trees, shrubs and accents, grasses and ground covers are established.

Landscape Design

9. The proposed 1000mm soil depth containerised planter on the southeast corner of the site creates a constrained area of deep planting. Considering the built form outcomes in term of height, scale and setbacks from adjoining properties, this area would be more suited as inground deep planting. This outcome would ensure an improved interface with adjoining properties and allow for increased opportunities for large subtropical shade trees at this junction to address PO8, PO28 of the Retirement and residential care facility code.
 - a. Provide amended plans including a Landscape Concept Plan prepared by a suitably qualified Landscape Architect that removes the proposed 1000m containerised planter from the southeast corner and replaces with inground planting, incorporating additional large subtropical shade trees at this junction.

Response

The proposed 1000mm soil depth planter at the southeast corner of the site is proposed to be retained as it forms an important part of the overall built form and landscape response at this interface. Removal of the planter would result in a more exposed built edge and create the potential for an approximately three metre high wall presentation along the frontage. The planter provides an important landscape element which softens this frontage, reduces the visual prominence of built form and contributes to a more landscaped and subtropical interface with the adjoining properties and streetscape.

The planter will incorporate deep planting and a layered planting palette, including climbing species, to provide vertical greening and additional landscape screening. This will assist in visually breaking down the wall element, softening the presentation of the built form and reinforcing the subtropical landscape character sought by the Retirement and residential care facility code. On this basis, the retained planter achieves a preferable interface outcome compared with replacing this area with inground planting, as it avoids a hard wall presentation while still delivering meaningful planting depth and landscape screening at this junction.

Refer to **Figures 6 and 7** above demonstrating the proposed sections and planting for the south-eastern planter.

Left-in/Left-out access – Waterworks Road

10. The submitted proposal does not adequately demonstrate compliance with the Transport, Access, Parking and Servicing Code, nor relevant Australian Standards and Council requirements for external works. The proposal to reinforce the left-in/left-out crossover arrangement on Waterworks Road through the installation of double barrier line marking is not supported. This treatment is not considered an appropriate or sufficient measure to formalise or enforce directional access at this location.
 - a. To demonstrate compliance with PO1 and PO3 of the Transport, access, parking and servicing code, provide revised engineering design drawings demonstrating a compliant access arrangement through the provision of a Type 2 Centre Island crossover in accordance with BSD-2021, inclusive of

detailed geometry and dimensions of the crossover; splitter island design and dimensions; and associated line marking and signage consistent with the standard drawing. The revised design must clearly demonstrate how the proposed access arrangement safely achieves the intended left-in/left-out functionality in accordance with Council standards.

Response

In response to Item 10, the Applicant has referred this matter to the project traffic team, who have prepared a separate technical response letter provided at **Attachment G**. The technical response addresses Council's comments regarding the proposed left-in/left-out access arrangement on Waterworks Road, including the suitability of the proposed access geometry, traffic control measures and external works within the Waterworks Road road reserve.

The response confirms that the access strategy has been reviewed having regard to the Transport, access, parking and servicing code, relevant Council standard drawings and applicable road design requirements. Where required, the proposed access arrangement and associated external works have been refined to demonstrate that safe and efficient left-in/left-out access can be achieved at the Waterworks Road frontage. The supporting technical material should be read in conjunction with the revised architectural and engineering drawings and the revised Waste Management Plan which identify the proposed access arrangement and turning paths.

Pavement markings – Waterworks Road

11. The recommendation to install 'Keep Clear' pavement markings on the westbound lanes of Waterworks Road adjacent to the proposed driveway is not supported. In accordance with AS 1742.2:2009 (Manual of Uniform Traffic Control Devices – Traffic Control Devices for General Use), 'Keep Clear' markings must not be used primarily to facilitate access to or egress from a driveway or side street. a. Remove this treatment from the proposal and revise the access strategy accordingly to rely on compliant geometric design and traffic control measures.
 - a. Remove this treatment from the proposal and revise the access strategy accordingly to rely on compliant geometric design and traffic control measures.
 - b. Submit a concept signage and line marking plan for all proposed external works within the road reserve associated with the development, including Waterworks Road and Bennett Road. The plan must clearly identify all existing and proposed traffic control devices (signage, linemarking and pavement markings), and demonstrate compliance with relevant Austroads guidelines, and Council standards.

Response

In response to Item 11, the project traffic team has prepared a separate technical response letter provided at **Attachment G**, which specifically addresses Council's comments regarding the proposed pavement marking and access management strategy on Waterworks Road.

The technical response confirms that the access strategy has been reviewed in light of Council's advice and that the proposal will rely on compliant geometric design and appropriate traffic control devices rather than unsupported pavement marking treatments. The response is to be read in conjunction with the revised Waste Management Plan.

Loading area design and compliance

12. The submitted architectural plans do not specify critical design parameters of the proposed loading area, including its dimensions and gradient. This information is necessary to demonstrate compliance with the relevant servicing and manoeuvring requirements.
- a. To demonstrate compliance with PO4/AO4.1 and AO4.2 of the Retirement and residential care facility code and PO8/AO8.1 and AO8.2 of the Infrastructure design code, submit amended architectural drawings that clearly identify and detail the length and width of the loading area and the longitudinal and crossfall gradients of the loading area. The provided information must demonstrate that the loading area is appropriately designed to safely and efficiently accommodate waste servicing vehicles in accordance with Council requirements.

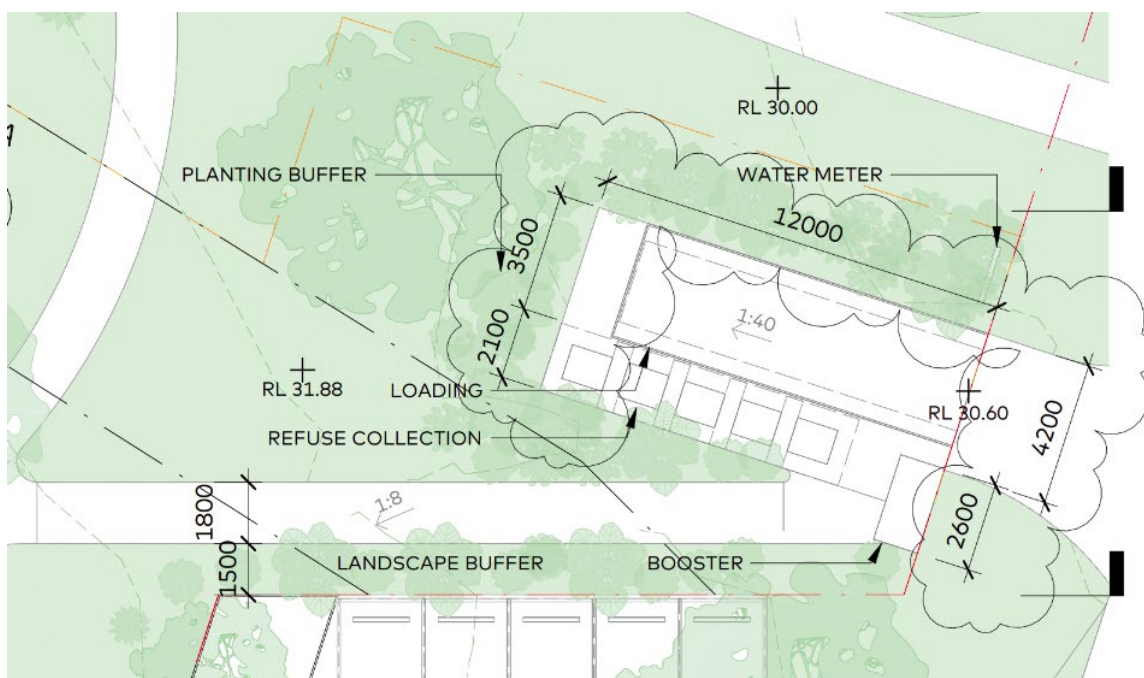
Response

In response to Item 12, a revised Waste Management Plan (WMP) has been prepared by Rhodium Environmental and provided in **Attachment F**.

The Waste Management Plan confirms that waste servicing will occur from the dedicated Bennett Road loading bay designed to accommodate Brisbane City Council's rear-lift waste collection vehicle, with appropriate clearances, safe vehicle manoeuvring, and a refuse vehicle standing area constructed to a maximum gradient of 1:40 in accordance with Council's refuse, transport, access, parking and servicing requirements.

Amended architectural drawings have been prepared to ensure the dimensions and gradients are accurately shown for the loading bay and waste servicing area, as shown in **Figure 10** below.

Figure 10 – Refuse Collection Dimensions and Gradient



Source: Cox Architecture

Existing waste servicing

13. Ashgrove Golf Club appears to have an existing front-lift waste bin located within the Ashgrove Golf Course car park (adjacent to 803 Waterworks Road), which appears to service the golf club. The submitted proposal indicates that this car park is to be demolished, however it is unclear how the existing waste servicing arrangement for the golf club will be impacted or maintained.
- a. Provide clarification and supporting documentation demonstrating:
- The current waste servicing arrangement for the Ashgrove Golf Club;
 - Whether the existing front-lift bin is to be relocated, replaced, or otherwise accommodated as part of the development; and
 - How the proposed development will ensure that uninterrupted and compliant waste servicing for the Ashgrove Golf Club is maintained without adverse impact. The response must clearly demonstrate that the proposed development will not compromise the ongoing waste management operations of adjoining land uses.

Response

In response to Item 13, the revised Waste Management Plan prepared by Rhodium Environmental and provided at **Attachment F** confirms that the existing Ashgrove Golf Club waste servicing arrangements have been considered as part of the amended proposal. The WMP identifies that waste generated by the existing Ashgrove Golf Club has historically been disposed of using a bulk bin located within the existing car park to the east of the Club, which is proposed to be demolished as part of the development works.

The WMP clarifies that the Golf Club's bulk bin will be relocated back to the existing back-of-house bin storage area and serviced via the adjoining loading bay, consistent with the Club's existing approval and previously established servicing arrangements. This ensures that the demolition of the existing car park and removal of the current bin location will not compromise the ongoing waste servicing requirements of the Ashgrove Golf Club.

The proposed retirement living development will be serviced separately through its own dedicated basement waste storage room, bin servicing point and refuse loading bay arrangements accessed from Bennett Road. Accordingly, the development provides for self-contained waste management while maintaining uninterrupted and compliant waste servicing for the Ashgrove Golf Club. The proposed arrangements will not adversely impact the ongoing waste management operations of the adjoining golf club use.

For further information, refer to **Attachment F** prepared by Rhodium.

Fuel Burning – Back Up Pumps and Generators

14. Provide additional details regarding any proposed on-site fuel burning activities, such as standby power generators, fuel pumps or fire pumps that run on diesel or gas. If such equipment is planned, please outline the following information:
- the type, location, and cumulative fuel burning capacity measured in megawatts (MW) for each piece of fuel burning equipment;
 - the type of fuel used to operate the equipment, along with the quantity;

- c. information on the positioning of vents and controls aimed at preventing undesirable air and noise emissions towards sensitive uses;
- d. the annual number of hours the equipment is expected to be operational, including testing as per the manufacturer's recommendations; and
- e. for equipment powered by Diesel, an evaluation in accordance with Australian Standard AS1940 and suggested actions to ensure any potential leaks or spills are adequately contained.

Response

The proposed development does not include any standby generators, fuel pumps or other ongoing fuel burning equipment. The only fuel burning equipment associated with the development comprises emergency fire pumps located within the basement level of the building.

The fire pumps are emergency infrastructure only and will operate solely for testing, maintenance and emergency situations in accordance with relevant operational requirements and manufacturer specifications. Accordingly, no additional fuel burning activities are proposed as part of the development.

Summary

This correspondence constitutes the total extent of our response to the Further Advice made by Council and as such, all additional information has been responded to. We ask that Council progress the assessment of the application, with a view to approving the application, subject to reasonable and relevant conditions.

If you have any questions regarding the above or attached material, please do not hesitate to contact the undersigned, **Jorja Feldt (Senior Consultant)** or **Natalia Grodek (Consultant)** on (07) 3007 3800.

Kind regards,

A handwritten signature in black ink, appearing to read "Joe Selwood".

Joe Selwood
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