



Dedicated to a better Brisbane

19 August 2026

Toowong Central Investment Holding Pty Ltd
C/- Urbis Ltd
Level 32, 300 George Street
BRISBANE CITY QLD 4000

ATTENTION: Melanie Kwok

Application Reference: A006836692
Address of Site: 47 HIGH ST TOOWONG QLD 4066

Dear Melanie

RE: Further advice

Council acknowledges that the design and detail of the proposal has been further refined since lodgement of the application and improvements have been made to the plaza areas and towers. However, further information, amendments and clarification are required to address the following matters.

There is currently insufficient information for Council to assess the proposed relocation and refurbishment of the Heritage place, however it is noted further information is currently being prepared by the applicant for submission to Council. Further advice regarding these Heritage matters may be raised in the future subject to Council's review of the Heritage material once submitted.

Podium design

1. It is acknowledged that the proposed podium height has been reduced with five storeys in some parts of the site. This is apparent where located at the side boundaries of the adjacent sites at the corner of Jephson Street and Sherwood Road. However, some podium walls would benefit from greater variation in the wall plane, as they will remain visible from nearby streets and may still present with a bulky appearance.
 - a. Demonstrate the use of design elements (architectural form, colour, texture, materiality and detail) to avoid a bulky appearance. It is acknowledged that the elevations show some variation in the appearance of this wall interface, however, it is not apparent that the proposed finishes are sufficient to reduce the bulk.
 - b. To ensure the podium forms are sufficiently broken down in scale and adequately activate streets and arcades, further clarification is required through the provision of higher scale elevations and part sections for active frontages.

Urban common and plaza

2. Some further clarification is required with regard to pedestrian movement from the relocated indented bus stop on High Street to the plaza levels and in particular, demonstrating equitable access to the plaza levels. It appears that there is a significant level change

between the bus set down area and the plaza level without any direct means of equitable access.

Rooming accommodation

3. Tower 3 provides for a significant number of studio and twin units across the height of the tower. Whilst the development provides for common facilities for occupants at the podium levels, it is unclear as to whether the space and facilities provided is adequate to ensure the health, safety and amenity of residents as required by PO5 of the Rooming accommodation code.
 - a. Provide a breakdown of the spatial allocation for kitchen and laundry facilities along with the total number of residents intended to occupy the building.
 - b. Provide additional common kitchen and laundry facilities at other levels throughout the height of tower.
 - c. Nominate the location for Short term accommodation management offices and mailrooms.

Crime Prevention Through Environmental Design (CPTED)

4. Towers 2, 3 and 4 lack mail rooms/parcel delivery spaces and management offices. Noting the scale of the development and the likelihood of a significant volume of deliveries being sent to the site, it is important for residents to ensure that these deliveries are managed and secure to limit crimes of opportunity.
 - a. Demonstrate that the development will design for crime prevention
 - b. Provide mail/parcel deliver spaces for all residential towers
 - c. Provide management spaces for each residential tower aligned with ground level lobby spaces.
5. The pedestrian arcade at the southern interface of the site is a welcome addition to support movement through Toowong. However, there are concerns that this space may not be well surveyed.
 - a. Demonstrate that the arcade has been designed to be safe, welcoming and well surveyed.

Planter depth

6. The upper ground and podium planters are too narrow and shallow to support the substantial screening vegetation required to effectively screen the podium carparking.
 - a. Increase the depth and width of these planters to accommodate a two-tier planting, consisting of upright screening species and cascading vegetation, to achieve more effective green coverage and visual screening of the podium car park.

Site circulation

7. Although site circulation diagrams have been provided, the legibility of equitable access through the building has not been adequately demonstrated. Equitable public access throughout the site is required 24/7.
 - a. Provide clarification on the legibility, accessibility, and availability of equitable access through the building. Equitable access from the bus stop to the Central plaza is required to be provided. Furthermore, access from the western side of High Street is constrained by the proposed location of the heritage building. The location of buildings and structures should ensure unobstructed circulation and maintain clear sightlines to the Central Plaza when approaching Toowong from the west.
 - b. Provide amended plan clearly notating the area(s) through site which allow public access 24/7.

Plan clarity

8. The plans show general overall diagrams of each floor of the building, and the detailed internal layout of the units and short term accommodation is provided on separate plans, which makes it difficult to understand the overall layout of the towers.
 - a. Provide amended plans showing detailed internal layouts altogether for each floor of the buildings.
9. The hardscape strategy plan is missing a legend.
 - a. Provide amended drawing to include legend.
10. The written response and amended DA forms mentions 5 stages are proposed and this is reflected within the Construction Management Plan, however the main suite of architectural plans appear silent on staging, and the DA Forms do not explain how the land uses are to be applied to each stage.
 - a. Provide amended DA Forms and architectural plans clearly showing the land use and areas/built form proposed within each stage.

Noise

11. The Noise Impact Assessment has been reviewed. The report has not provided sufficient details to demonstrate compliance with the noise criteria in PO1 of the Centre or mixed use code.
 - a. The report has recommended incorporation of acoustic separation and building design measures to ensure that the bar use can comply with the noise criteria in PO1 of the Centre or mixed use code. Please specify the acoustic separation and building design measures required to meet the relevant noise criteria.
 - b. While no bars are indicated on the plans, this application includes material change of use for bar and as the application has not limited the bar use to specific tenancies, a conservative worst-case scenario is required to be modelled. Provide detailed acoustic modelling of typical bar use noise sources, including crowd and amplified music, and provide forecast noise levels at the nearest sensitive uses or zones, where noise criteria are applicable. Cumulative noise impacts from noise sources on-site are required to be assessed against the relevant criteria, instead of assessing the different noise sources in isolation of each other.
 - c. A solid canopy is proposed over outdoor dining areas below Tower 4 on Level 4 where seats are located outside the tower footprint. Provide further details on the solid canopy for it to be considered/rated as an acoustic screen.
 - d. While recommendations have been made for noise control of the gym, the report has not demonstrated that the indoor sport and recreation use can comply with the noise criteria. Provide detailed acoustic modelling of typical gym use noise sources, including free weight impact noise and amplified music, and provide forecast noise levels at nearest sensitive uses or zones where applicable. Also provide the design details of gym floor construction and forecast the audibility of any gym use into sensitive uses within the development.

Note: Gym use (indoor sport and recreation) is required to be inaudible outside standard hours (EP Act 440W). Insufficiently designed floor impact mitigation has a high risk of limiting the viability of the use. Where gym use is anticipated outside standard hours a specialised floating slab design floor is likely to be required to limit structural noise transmission into sensitive uses within the building.

External traffic network

12. The updated Transport Engineering Report has addressed several of the concerns raised by Council regarding the impacts of the development on the external road network.

However, further information is required to demonstrate the proposed external works and access arrangement. Outstanding areas of concern include the following items and are to be addressed as part of an updated Transport Engineering report Certified by the RPEQ.

- a. The updated Transport Engineering report states that a standard format road dedication is proposed along the High Street frontage. This conflicts with the submitted architectural plans that indicate a volumetric dedication. No concept functional layout has been provided to demonstrate the proposed access arrangement or the indicative pedestrian route.
 - i. Provide a scaled and dimensioned concept traffic functional layout that demonstrates the proposed High Street access arrangement that includes the road dedication requirements, pedestrian access arrangements, verge widths and proposed access arrangement.
 - ii. Provide amended architectural plans that demonstrate a standard format dedication, sized to include the verge tie-in on the northern side of the driveway (i.e. not volumetric).
 - b. The description of the mitigation of Jephson/Sherwood Streets in the Transport Engineer report body is inconsistent with what is shown on drawing 24BRT547-12. It is Council's understanding that the only works that are to be undertaken as part of the mitigation of Jephson/Sherwood Streets is the extension of the peak period No Stopping restrictions on the western leg, consistent with Condition 54 of the previous approval A005894666.
 - i. If a change to the proposed mitigation of Jephson/Sherwood Streets is proposed, the changed scenario should be demonstrated in the traffic modelling given the increase in the scale of this development compared to the previous approval.
 - c. The updated Transport Engineering Report states that the Jephson Street indented passenger loading zone has been updated to provide geometry and standard format land dedication. However, the submitted plans contain inconsistent information regarding the proposed dedication and loading zone arrangement with the architectural plans showing a volumetric dedication rather than standard format and the Colliers plan 24BRT0547-07 Rev D shows original geometric arrangement. Further information and consistent proposed plans of the indented passenger loading zone are required to demonstrate the proposed design and road dedication requirements.
 - i. Amended the proposed architectural plans to demonstrate a standard format land dedication and remove references to volumetric dedication.
 - ii. Provide a scaled and dimensioned concept traffic functional layout for the proposed pavement indent.
13. It is stated in the Transport Engineering report that the raised island within Jephson St can be provided as part of the site works. This has not been demonstrated and the overall proposal for the road reserve area that will contain the raised island is unclear.
- a. Provide a scaled and dimensioned concept traffic functional layout that demonstrates how the Jephson St raised median island is to be implemented within the road reserve.
 - b. If the Patterson's Folly pedestrian improvements at the High Street/Ebor Street signals are still proposed as part of the external road works, the changes are to be supported by appropriate supporting evidence so that the proposal can be assessed in full.
 - c. Provide Concept functional layouts (supported by design vehicle swept paths) for the proposed intersection upgrade, and an Impact assessment of the proposed changes to the area.

Carparking supply

14. The submitted Transport Engineering Report contains inconsistencies regarding the proposed car parking provision rates. Table 5-1: TAPS PSP Car Parking Supply

Requirement states the required and provided car parking rates for the proposed development. The provision rates in this table conflict with the provision rates outlined in section 5.1.3 Table 5-2: Proposed Car Parking Supply states that 332 spaces will be reserved for commercial use.

- a. Provide an amended RPEQ-certified Traffic Engineering Report that clearly identifies the required and proposed car parking provision for each land use and demonstrates how the proposed car parking allocation complies with and achieves the outcomes of the TAPS code.
15. It is advised that a percentage of the car parking spaces may be considered small car parking spaces due to constraints such as column spacing. Provide the expected percentage of small car parking spaces that may occur on the site, in accordance with section 7.8.1 of the TAPS PSP.

Internal traffic layout

16. Table 7-1: TAPS PSP Service Vehicle Requirements of the Transport Engineering Report proposes the necessary provisions for service vehicles across the proposed use types for the site. The provision rates do not adequately demonstrate that the proposed servicing provisions are sufficient for the scale and arrangement of the development. The servicing assessment considers the multiple dwelling towers as a single use and does not adequately consider the servicing demands of each tower independently in regard to minimum services requirements.
- a. Provide an amended RPEQ-certified Traffic Engineering Assessment that reviews the servicing requirements of the development which treats each multiple dwelling tower as an individual development use and demonstrates that sufficient servicing facilities are provided for all proposed uses in accordance with PO18 of the TAPS code.
 - b. Demonstrate that the proposed servicing areas associated with Towers 1 and 3 provide safe, efficient and functional access for the servicing demands of Towers 2 and 4 including all common uses and that servicing operations can occur without adverse impacts on site circulation, vehicle manoeuvring or pedestrian safety.

Pedestrian site access

17. The proposed relocation of the heritage building creates unequitable access and circulation within the common plaza by introducing pedestrian and cyclist pinch points. The location of the heritage building and pedestrians/ cyclist flow from the public realm into the site should be reconsidered to provide access to the site that meets the requirements of PO7 and PO8 of the TAPS code.

Residential bin collection

18. Provide amended architectural plans which clearly demonstrates the area (m²) and internal dimensions of the Lower Ground 'Bin Room (Residential)'.
19. The internal width of the Ground Floor 'Bins Residential (T2 & T4)' room is required to be increased to enable functional and efficient manoeuvring of bins, including their rotation around the internal structural supporting columns during servicing. This, provide amended architectural plans which clearly demonstrates the 'Bin Residential (T2 & T4)' has been provided with a minimum area of 117.8m² (internal dimensions of 13.02m wide x 9m deep).
20. Additionally, provide a secondary roller door to the east of the proposed roller door to enable functional manoeuvring of bins. This is required due to the location of the structural supporting columns, which restrict bin movements within the bin room.
21. A separate 'Bins PBSA (T3) presentation room has been provided on the 'Ground Floor'. However, the internal width of the bin room does not enable functional manoeuvring of bins.
 - a. Provide amended architectural plans to demonstrate that the 'PBSA Bin Room' has been increased in width to facilitate functional manoeuvring of bins during

servicing. Demonstrate the 'PBSA Bin Room' has been provided with a minimum area of 48.78m² (internal dimensions of 5.42m wide x 9m deep).

Non-residential bin collection

22. Provide amended plans annotating the area (m²) and internal dimensions on the architectural plans.
23. Demonstrate the storage location and include an annotation stipulating "up-right bin press 3:1 compaction ratio for general refuse, paper and cardboard" within the 'Bins (Retail)' bin room.
24. It is acknowledged that the 'Supermarket uses' have adopted reduction technology by means of an up-right bin press (3:1 compaction ratio) for general refuse and inclusion of 'static compactor (30m²) with a 5:1 compaction ratio for cardboard'. Provide amended architectural plans addressing the following:
 - a. Clearly demonstrate the storage location and include an annotation stipulating 'up-right bin-press (3:1 compaction ratio) for general refuse' within the 'Bins (Supermarket)' bin room.
 - b. Demonstrate the size (length, width, height) of the 'Supermarket RORO' on a revised 'Ground Site Plan' and include an annotation which stipulates 'Static Compactor compaction ratio of 5:1 for paper & cardboard'.
25. Servicing of bins from the 'Bins (Retail)' and the 'Bins PBSA (T3)' results in bins manoeuvring across a floor level with a gradient which exceeds 1:20 (1:16).
 - a. Amend the architectural plans to demonstrate a maximum bin transfer gradient of 1:20 from both the 'Bins (Retail)' and the 'Bins PBSA (T3)' to the rear of the RCV loading and servicing position.

RCV swept path analysis

26. A RPEQ certified swept path analysis has been provided which demonstrates the RCV enters the 'T1L.1 HRV/ RCV' loading bay in a forward gear. However, the forward in RCV manoeuvre results in the SRV blocking bin transfer and an excessive transfer distance for bins.
 - a. Submit a revised RPEQ certified swept path analysis for a 10.24m Rear Loading RCV (As per BSD-3008-2) which demonstrates the RCV enters the 'T1L/1 HRV / RCV' loading bay in reverse gear, whilst utilising a lock-to-lock time of 6.00s and curb-to-curb turning radius of 9.757m.
27. The TIA Report includes a RPEQ certified swept path analysis for 12.5m HRV being the larger vehicle in lieu of providing an RCV certified swept path. However, the 'HRV – Forward Out' manoeuvre from 'CLD.1 HRV/ RCV' loading bay results in the HRV clearance envelope conflicting with the "Bin (Retail)" room.
 - a. Submit a revised RPEQ certified swept path analysis for a 12.5m HRV which demonstrates the 'Forward Out' manoeuvre from 'CLD.1 HRV / RCV' loading bay does not conflict with the built form.
28. The supermarket waste solution requires the use of a static compactor bin which will be collected by a 'Hook Lift Truck'. However, the TIA Report does not include a swept path analysis for the servicing of this bin.
 - a. Provide a RPEQ certified swept path analysis for the proposed dual steer and dual rear wheel 'Hook Lift Truck' which demonstrates safe and efficient servicing of the supermarket's static compactor bin.
 - b. Ensure the swept path includes the vehicle specifications (i.e., length, width, track, operational height, lock-to- lock time, curb-to-curb turning radius etc).

Flooding

29. The submitted Site Based Stormwater Management and Engineering Services report proposes a minimum basement level of 11.46 metres AHD based on an Overland flow Assessment Report that was completed in 2019 by Stormwater Consulting. Council does

not support reliance on historical flood assessments that do not form part of the current development application.

- a. To demonstrate compliance with PO5 and PO7 of the Flood overlay code, submit an amended RPEQ-certified Site Based Stormwater Management and Engineering Services Report that includes the latest available flood modelling and demonstrates the proposed development achieves the required flood planning levels. Flood modelling information for the site can be obtained via Council website using the Open Data Portal.
- b. Due to the existing overland flow flooding affecting the Sherwood Road frontage of the site, demonstrate that the proposed development achieves the minimum flood planning levels prescribed in Table 9.4.9.3.C of the Flood overlay code.
- c. In accordance with Table 9.4.9.3.C of the Flood overlay code, demonstrate that the basement car parking entry achieves a minimum flood planning level of the 2% AEP flood event + 300 mm and maintains no opening to the basement below the required level.
- d. A minimum of level of 11.66m AHD for the basement opening and 11.80m AHD for building floor levels is expected for the minimum flood immunity levels.
- e. The use of flood gates is not supported by Council. Given the site is impacted by overland flow flooding (which is characterised by limited warning times) reliance on active flood mitigation measures is not an acceptable outcome. Remove the proposed flood gates and redesign the basement entry point as required to achieve the minimum flood planning levels.

Lawful point of discharge

30. The proposed Lawful point of discharge as demonstrated on the 'Preliminary Stormwater Drainage Layout Plan' is generally in accordance with Councils requirements. Additional information is required to clarify the proposed stormwater system arrangements on the Sherwood Road frontage and to demonstrate there are no adverse impacts from the arrangement in accordance with PO1, PO3 and PO6 of the Stormwater code.
 - a. Confirm the proposed location of the relocated stormwater gully pit and demonstrate that it does not conflict with pedestrians boarding or alighting from public transport services within the adjacent bus zone.
 - b. Provide a cross section of the verge and stormwater treatment tank that includes the elevations of the tank and surface/ground levels to demonstrate how the surcharge will occur from the system.
 - c. Demonstrate that any surcharge resulting from the stormwater treatment system is contained within the verge and does not adversely impact pedestrian movements, public safety or surrounding infrastructure within the road reserve.

Construction management plan

31. The provided traffic management plan does not any proposed footway or road closures. Please be aware that any future road closures or footway closures will be subject to the Development Services - Construction Management Guidelines - Brisbane Central Business District and City Frame

Please phone me on 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 'Chris Dixon', with a long horizontal flourish extending to the right.

Chris Dixon
Senior Urban Planner
Planning Services North
Phone: 31787264
Email: chris.m.dixon@brisbane.qld.gov.au
Development Services
Brisbane City Council