



**City Planning and Economic Development Services
Development Services**

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Dedicated to a better Brisbane

14 August 2026

60 Ksd Pty Ltd Atf 60 Ksd Property Trust
C/- Town Planning Alliance
PO Box 7657
EAST BRISBANE QLD 4169

ATTENTION: Jessica Robson

Application Reference: A007058743

Address of Site: 60 KINGSFORD SMITH DR ALBION QLD 4010

Dear Jessica

RE: Information request in accordance with the Development Assessment Rules

Council has carried out an initial review of the above application and has identified that further information is required to fully assess the proposal. While Council acknowledges the proposal is unique in its design and modulation, significant changes to the development are required to ensure a more appropriate outcome for the site which reflects the height, site cover, setbacks, deep planting and flooding requirements for the site as required and intended under the Albion neighbourhood plan code and *Brisbane City Plan 2014*.

Building height

1. The proposed building height of 28 storeys differs significantly from the intended 10 storey height for the site in AO1 and AO2.1 of the Albion neighbourhood plan. Whilst there is merit for additional height in this location, the proposed 28 storey height differs from the intent of the Raceway precinct and recent approvals in this precinct of the Albion neighbourhood plan area.

It is not apparent that the proposed building height is consistent with the community expectation for height which is set by the neighbourhood plan provisions, existing building stock and recently approved development that has yet to be built. On review of this context, there are no developments in this neighbourhood plan area that approach the height proposed.

It is further noted that the building height will overshadow nearby public realm space and heritage places (Newstead House, Newstead Park, The Lores Bonney Riverwalk and the Breakfast Creek Hotel) and will reduce the amenity of these locations. It also noted that nearby developments are also likely to be impacted by the proposed building height.

The proposal has an impact on the public view corridor available from Bartleys Hill Reserve as identified in Figure a, and PO2 of the Albion neighbourhood plan. Although the application has included view analysis, the proposed development is shown highly visible in the foreground of the identified view and will impact on the extent of views available to the City Centre Skyline.

- a. Reduce the building height to be more consistent with the anticipated building height for the location. This will require a significant reduction in the overall building height.

- b. Provide comparative shadow diagram(s) that indicate a building envelope compliant with acceptable outcomes of City Plan assessment benchmarks compared to the proposed on the same diagram to better determine the impacts generated.

Tower site cover and setbacks

2. The tower between level 2 and 16 has a site cover of approximately 63% where a 40% tower site cover is anticipated in the High density residential zone. This is exacerbated by the significant performance outcomes for setbacks to each boundary (front, side and rear). Although the development proposes a single loaded common corridor arrangement to assist in reducing overlooking along some of the boundaries to adjoining property, the proposed height and reduced setbacks create an overly dominant building interface to neighbouring properties which is not offset through appropriate setbacks and separation (PO3 of the Multiple dwelling code).

Although the effort in pursuing a high-quality design to reduce some of the perceived building bulk is acknowledged, the built form on the site is not of a form and proportion relative to site area which is expected on a prominent site, and does not reflect PO3, PO6, PO7 and PO8 of the Multiple dwelling code.

The proposed front boundary setbacks, which vary but are as little as 320mm, 50mm and 555mm are not considered to be sufficient to reduce the visual dominance of the building relative to the public realm (PO3c of the Multiple dwelling code), nor does the development provide for adequate landscape buffering to the street (PO3f of the Multiple dwelling code).

- a. Provide amended plans increasing setbacks to the site boundaries to reduce the dominance of the built form relative to neighbouring properties and the streetscape, and thus also reducing tower site cover.

Building length and bulk

3. The proposed development, which includes 'L' shaped floor plates has a cumulative length of approximately 103m. Whilst the floor plate reduces in size as it rises through the tower, it remains the case that the building length and overall bulk and scale is considerably greater than that anticipated for a development in the high density residential zone under PO9 of the Multiple dwelling code.
 - a. Reduce the overall length of the development and provide further information demonstrating the design response which have been incorporated to break up the building length.

Ground level site cover and deep planting

4. It is noted the design intends to create a podium and tower form, with the first two storeys presenting as a solid base. Notwithstanding, the proposal is also required to achieve other requirements such as deep planting. Most of the deep planting nominated on the plans is constrained by terracing, built form above/below or does not meet the minimum dimensions of 4m to be considered deep planting. It is therefore apparent that the site cover at ground level and level 1 is not suitable for the establishment of large subtropical shade trees or by landscape buffering in accordance with PO8 and PO29 of the Multiple dwelling code.
 - a. Provide a reduction in site cover at the lower levels along with the provision of large, contiguous areas for deep planting to allow for the establishment of large subtropical shade trees.
 - b. Reduce the site cover to ensure the building form is more consistent with the intended built form and landscape character for the location.
 - c. Provide deep planting in ground, free of encumbrances and provide for an appropriate landscape buffer to adjoining sites.

- d. Noting the prominent location and setting of the site, being located on Kingsford Smith Drive and visible from a range of locations and approaches, it is suggested that larger pockets of deep planting be provided to the Kingsford Smith Drive frontage to contribute to the landscape character of the broader public realm.

Flood resilience

5. Noting that the site is impacted by Brisbane River Flooding and Creek/Waterway Flooding, there is considerable concern that future residents may be isolated in a tall building during a flood event and may have ongoing impacts during flood recovery. There is particular concern with the provision of lift shafts that extend to basement levels, may be impacted by rising flood waters, and may not be serviceable during and after flood events for a considerable period of time (PO3 of the Flood overlay code).
 - a. Demonstrate that the lift cars, lift call buttons/electricals, and lift wells have been designed to minimise damage during a flood event and allow for speedy recovery and ongoing use of lifting services during a flood recovery period.
 - b. Demonstrate that other building services can continue to operate during a flood event to allow for shelter in place outcomes.

Water storage for irrigation

6. The proposed container planting throughout the building is supported as it softens hard built form and improves microclimate, however an accompanying Irrigation Report is required. In addition, water storage tanks dedicated for irrigation only are to be shown on the plans (size and location).
 - a. Provide amended plans that show water storage tanks location and size. This may impact on number of carpark spaces.
 - b. Provide detailed estimates of required water consumption for irrigation (Irrigation Association of Australia), and the size and location of rainwater catchment and storage tanks for irrigation, sufficient to supply at least 95% of irrigation needs.

Existing easements

7. The assessment report states that existing Easement B on RP33466, Easement B on RP33467, Easement B on RP33468 and Easement B on RP33470 on the site are for trunk sewerage and located beneath the basement car parking. No easement documents or survey have been submitted to demonstrate the easements are volumetric and below the extents of the development. The easements appear to be for protection of the S1 sewer line which is an Urban Utilities asset.
 - a. Provide easement documents and survey plan to demonstrate the EMT are volumetric and below the extents of the development.
 - b. Noting the proposed basement extents/depth, provide written consent from the asset owner Urban Utilities for support to build over/near the asset, and if within the easement, obtain consent to build within the easement.

Traffic

8. The provided Traffic Impact Assessment (TIA) report prepared by Velocity Traffic Engineering is not supported, specifically the proposed access location. It is recommended to investigate if the development's crossover can be relocated further to the north along Amy Street to achieve a minimum 20m separation from Kingsford Smith Drive (meeting Transport, Access, Parking and Servicing Planning Scheme Policy (TAPS PSP) requirement), minimise the level difference between the verge and carriageway, increase vehicle storage between the crossover and the Amy St intersection stop bar, and be restricted to left in / left out operation. The items below are to be addressed in a revised TIA Report.

Amy Street / Kingsford Smith Drive intersection impacts

9. The assessment of the "net increase" in Section 5.3 of the TIA is not an accurate basis for assessing impacts at the Amy Street / Kingsford Smith Drive intersection. The proposed development removes all existing access points — including the consolidated driveway on Agnes Street — and funnels all site traffic through a single consolidated crossover on Amy Street. Currently, the existing development's traffic is split across multiple access points, with only a portion of the site (9 and 11 Amy Street) accessing via Amy Street, while the existing office building accesses via Agnes Street. The reported net increase does not reflect the resulting change in demand at the Amy Street / Kingsford Smith Drive intersection specifically.
 - a. Demonstrate compliance to PO1 and PO3 of the Transport, access, parking and servicing code, through an assessment of how the development's peak hour trips will be distributed to the Amy Street / Kingsford Smith Drive intersection, accounting for the redistribution of traffic from the removed Agnes Street access.
 - b. Provide confirmation that the development traffic does not exceed the 5% threshold for any turning movement, in accordance with TMR's Guide to Traffic Impact Assessment. No turning movement data at this intersection has been provided in the TIA.

Conflicts with existing infrastructure, access geometry, and pavement markings

- a. The submitted plans indicate the existing concrete safety barrier will be partially demolished and the end "made good." No engineering justification has been provided to demonstrate that shortening this barrier maintains the required hazard protection for the Inner City Bypass (ICB) infrastructure. Furthermore, reconstructing a blunt or sloped ("turned-down") concrete end terminal that is not flared away from the carriageway poses a severe safety hazard (e.g., launching or vaulting errant vehicles) and does not satisfy modern roadside safety requirements.
 - a. In accordance with PO1 and PO3 of the TAPS code, provide a detailed roadside safety assessment prepared and certified by a suitably qualified RPEQ demonstrating that the proposed barrier modification is appropriate and fully compliant with acceptable design standards.
 - b. The verge and carriageway levels differ at the concrete barrier location, and at the southern splay of the proposed crossover (approximately opposite the end of the Amy St median island), the survey plan suggests the carriageway is approximately 400mm to 450mm above the verge level. It is unclear how the level difference across the crossover can be reconciled, are change to the exiting verge or road levels proposed, not detail has been provided.
10. The proposed crossover achieves approximately 12m separation from Kingsford Smith Drive, which is less than the 20m minimum separation specified in TAPS PSP table 5. The TIA discusses 10m separation for TAPS PSP compliance but is for separation from a minor road intersection.
 - a. Revise the proposal to meet TAPS PSP minimum requirement or provide sufficient RPEQ justification for a performance outcome (referencing adequate standards).
11. The proposed removal of the existing pedestrian kerb ramps (and the corresponding ramp on the opposite side of Amy Street) is not supported. This facility was specifically installed as part of the ICB project in lieu of a signalised crossing at the intersection due to the existing verge level difference from the road level. Relocating the facility further away from the intersection desire line is undesirable and creates significant design challenges regarding compliant Crossing Sight Distance (CSD). Additionally, the submitted plans note that the existing large guidance sign requires relocation, no alternate location has been identified.
 - a. Provide amended civil plans demonstrating how the pedestrian crossing facility will be retained or reconfigured without pushing pedestrians off the primary desire line

or compromising CSD. Furthermore, identify a compliant alternate location for the large guidance sign that does not obstruct driver Intersection Sight Distance (ISD) or obscure visibility for approaching road users. Please note desktop assessments will not be accepted, please ensure relevant site survey/investigation are carried out and evidence (survey photos, etc) provided within the revised TIA.

12. The proposed crossover provides storage for approximately 2 cars (12m) between the crossover and the Amy St Stop Bar. A third vehicle arriving at the southbound queue would block the crossover, making egress from the site sensitive to disruption, in particular in the AM peak period (51.2 egressing vehicles per hour). No RPEQ comment on the impact of this have been provided.
 - a. Provide RPEQ comment and outline what impacts will be implemented to internal queuing for the egress in the peak.
 - b. The scale 1:100 given on plan SK09 is incorrect and should be 1:200. Provide a revised plan and ensure the revised TIA has correct scaled plans.

Access movement restrictions (left-in / left-out requirement)

13. The proposed all-movements crossover is located directly within the operational queuing extents of multiple approach lanes for the signalised intersection. Allowing right-turn movements into and out of the site across queued traffic streams creates unacceptable safety risks (e.g., blind "filter-turn" crashes and rear-end crashes). In accordance with PO1 and PO3 of the TAPS code, the crossover must be restricted to left-in/left-out (LILO) movements only.
 - a. Provide amended functional layout plans illustrating this restriction, achieved via the physical extension of the existing raised median on Amy Street to prevent right-turn manoeuvres.

Line marking

14. The TIA recommends that "keep clear" line marking is implemented along Amy St at the frontage of the adjacent site, however this design does not comply with PO1 of the TAPS code and is not supported. AS 1742.2: 2002 stipulates that such markings shall not be used primarily for the purpose of facilitating access to or egress from a side street or driveway.
 - a. Provide an amended TIA and revise the proposal accordingly.

Flooding

15. The proposal is for a large residential tower with 4 basement levels, its design life is expected to extend past 2100. The site is located in FPA 3,4 & 5 for river flooding and FPA 2,3 & 4 for creek flooding which requires a Flood risk assessment in accordance with PO3 of the Flood overlay code and Section 9.4 of the Food planning scheme policy, and requires consideration to Part m "impact of increases in rainfall intensity at 2050 and 2100 in regard to safety and property damage". Best practice also requires inclusion of climate change in accordance with the latest Australian Rainfall and Runoff (ARR) requirements. Council's Floodwise property report reflects climate change levels for the creek flooding but not river flooding. Please be advised that the climate change 1% AEP is 4.10m AHD for river flooding.
 - a. Accordingly, provide a revised Flood Assessment Report (including updated flood risk assessment section) to include 1% AEP river level of 4.10m AHD.
16. The provided Flood Assessment Report states that residents can isolate (shelter in place) as part of the Flood emergency management on the site. Evacuation of a large number of residents would be difficult, and the lowest level of residential dwellings is 16.20m AHD which is well above the 1% AEP. However, the shelter in place strategy needs further clarification.

- a. Clarify how the site will remain habitable with essential service during isolation. It is crucial that backup power supply is provided to maintain essential services in the building so it can remain habitable during and after flooding. Provide further detail on this issue within a revised Flood Assessment Report (a Flood emergency management plan section should be added to the report clearly detailing the flood emergency management proposed).

Parking provisions

17. Whilst the proposed vehicle parking provision can be supported as it complies with City Plan version 36, the TIA response to TAPS code cites City Plan version 25, while the application is lodged under version 36.
 - a. Provide an amended TIA which references the version of City Plan the application is lodged under (version 36).

Bicycle parking

18. 166 resident and 42 visitor bicycle parking spaces are required to comply with TAPS code (AO5)/PSP table 21. The TIA 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) and proposes that 76 resident and 32 visitor spaces are sufficient for the site. The proposed reduced bicycle parking provision to TAPS code is not supported. The site's location is adjacent to high quality active transport infrastructure (as noted in the provided TIA). Given this, the resident/visitor bicycle use would likely be significant, and demand for bicycle parking high.
 - a. Revise the proposal to align the bicycle parking provisions with TAPS PSP rates.

Filling and excavation

19. The submitted Stormwater Management Plan includes concept excavation plans of the basement. The plan references a Geotechnical Report regarding the basement shoring.
 - a. Given the significant basement depths, proximity to the river and proximity to significant Council infrastructure (Inner city bypass tunnel and Kingsford Smith Drive), provide a copy of this Geotechnical Report for assessment, demonstrating the surrounding infrastructure has been accounted for in the design and construction methodologies of the basement in accordance with AO3 and AO9 of the Filling and excavation code.
 - b. Additionally, clarify if temporary rock/ground anchors are proposed as part of the temporary basement excavation support.

Refuse

20. The development appears to provide sufficiently sized refuse rooms for the residential units and non-residential uses generated waste streams per week, however minor changes are required to the architectural plans refuse solutions to satisfactorily address PO32/ AO32 of the Multiple dwelling code and PO8/AO8.1 & AO8.2 of the Infrastructure design code.
 - a. Provide amended architectural plans clearly labelling the "Residential" and "Non-Residential" 'Refuse Rooms' accordingly.
 - b. Demonstrate the area (m2) and internal dimensions of each 'Refuse Room'.
 - c. Include an annotation and mark-up identifying the location of the Residential Overhead Compactor (3:1 compaction ratio), designated for general refuse only.
 - d. Demonstrate that a speed hump has been installed on the western side of the pedestrian crossing to prevent bulk bins from rolling down the 1:10 driveway ramp during waste collection servicing.

Parking layout

21. The visitor bicycle parking areas have been incorrectly noted on the architectural plans. The plans are noted with 14 visitor spaces on B2 and B4 between tandem resident car parking spaces, but this appears to be a drafting error, carrying over the notation for the B1 visitor bike room.
 - a. Provide revised architectural plans to address this error.

Erosion and sediment control

22. Provide a completed and signed Erosion Hazard Assessment (EHA) form as part of the development application as required by the Infrastructure Design PSP Chapter 7, Table 7.11.2.1.A.

Noise

23. To enable a comprehensive assessment of the proposal against PO1 of the Centre or mixed use code and PO2 of the Indoor sport and recreation code, the following additional information and changes to the Acoustic Report are required.
 - a. Clarify the proposed operating hours for the centre uses. The Acoustic Report assesses operations between 6:00am and 10:00pm, whereas the Code Assessment Report identifies compliance with AO1.1 of the Centre or mixed use code based on operating hours of 6:00am to 8:00pm.
 - b. Assess the potential noise impacts of the proposed non-residential uses on the proposed residential uses within the development.
 - c. Where applicable, include assessment of amplified sound and/or music associated with the indoor sport and recreation use and other recreational areas if these are to be accessible to non-residents (gym, wellness centre, etc). Also include crowd noise such as cheering and yelling.
 - d. If the gym is intended to be accessible to non-residents, assess potential impacts from structure-borne vibration due to dropping of weights.
 - e. The applicable noise criteria for the High density residential zone are to be achieved at the lot boundary. The assessment must therefore be undertaken on a conservative basis, having regard to the shortest practicable distance between the proposed noise sources and adjoining lot boundaries. The assessment should demonstrate compliance with the relevant noise criteria under worst-case operating conditions.

Fuel burning

24. The proposed development may include the use of fuel burning (e.g. back-up/emergency power generator, stormwater pump, fire pump). Such uses are defined as "Fuel Burning" in Schedule 1 Definitions – Industry Thresholds.
 - a. Submit further information outlining whether fuel burning is proposed. Such information is to include maximum fuel burning capacity in MW; potential hours of use, type and quantity of fuel stored, air quality controls and type of engine. In some circumstances an Air Quality Report, Acoustic Report, Fuel Storage and Spill Delivery Assessment may be required demonstrating compliance with PO1, PO2 and PO9 to 11 of the Industry code. Amendment to the DA form and an amendment to the proposed application may be required if a new industry use is triggered.

Preliminary construction management plan

25. Given the location and scale of the development and preliminary CMP should be prepared to outline how the construction impact will be managed to cyclists, the road network, pedestrians and surrounding residents.

Infrastructure charges

26. Submit Prescribed Form B and relevant plans so demand credit can be given accurately, including recording existing total impervious area. Please note that numerous two-bedroom dwellings contain a study, these spaces are large enough to fit a single bed and can be considered a reasonable sleeping space. Therefore, these will be charged as 3-bedroom dwellings (17 dwellings total).

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 A007058743.

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

Yours sincerely



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Development Services
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