

31/07/2026

BCC Ref: A006971515

ATP Ref: 125 Racecourse Rd – IR Response.pdf

The Chief Executive Officer
Brisbane City Council
Planning Services
Lvl 1 / 266 George Street
Brisbane QLD 4001

ATTN: TYRAH ZARAFA

Dear Tyrah,

**RE: RESPONSE TO THE BCC INFORMATION REQUEST FOR THE
PROPOSED MIXED USE DEVELOPMENT AT 123 & 125
RACECOURSE RD, ASCOT (BCC REF: A006971515).**

Further to Brisbane City Council's Information Request dated 14 April 2026 and in accordance with section 13.2(a) of the Development Assessment Rules under section 68(1) of the Planning Act 2016, please find below our full response to the matters raised.

Amended Architectural and Landscaping plans, together with updated Traffic and Civil Engineering Reports and an Arboricultural Assessment, are attached in support of this response. It is noted that in the process of responding to the Information Request, the uppermost residential level has been modified from 4 units (2 x 2 bedroom and 2 x 3 bedroom) to 2 x 4 bedroom units, resulting in the total number of units being reduced from 17 to 15.

The BCC request for information has been reproduced in italics, with the applicant's response following.

BCC REQUEST 1 – BUILDING HEIGHT

The proposed architectural plans provided lack sufficient information to determine the development's building height and its compliance with the relevant benchmarks of Brisbane City Plan 2014 (CP 2014). Provide amended plans including:

- a) Multiple sections and elevations with a clearly denoted ground level line and 1m above ground level line running perpendicular.*
- b) A concise breakdown of the rooftop level demonstrating it meets the "Rooftop garden" definition as prescribed in Schedule 1 – Definitions of Brisbane City Plan 2014. NB: Further information may be required once the proposed building height has been adequately determined.*

APPLICANT'S RESPONSE

The architectural plans have been amended by Profile Architecture (Issue TP8 - July 2026) to address this item. The amended set now clearly denotes the ground level and 1m above ground level line running perpendicular to ground level, enabling the building height to be readily determined against the relevant benchmarks of City Plan 2014.

It is noted that additional sections have not been provided, as these would not provide any further relevant detail. As shown by the 2002 contour data on Council's City Plan 2014 interactive mapping, the natural ground level between the 8m and 7.5m contours falls at a grade of approximately 1:100. Accordingly, variations in natural ground level across the critical rear portion of the building are insignificant.

The Elevations (Drawings A.04.01, A.04.02, A.04.03 and A.04.04) identify the relevant level datums from Ground Level (RL 9.350), through Levels 1–4, to the Rooftop Garden (RL 28.350) and Roof Top (RL 31.850). The accompanying Sections illustrate the height of the building relative to natural ground level and provide sufficient information to demonstrate the proposed building height.

A breakdown of the rooftop level is provided on the Development Data sheet (Drawing A.01.02), demonstrating that the rooftop satisfies



the 'rooftop garden' definition prescribed in Schedule 1 of City Plan 2014. Of the 689m² rooftop terrace area, the built form is limited to 295m² of roofed structures, comprising lift / stair access and associated resident amenities, with only 80m² contributing to GFA. A further 150m² of the rooftop area is provided as soft landscaping, with the balance comprising open rooftop terrace and communal open space.

A rooftop garden is defined as:

A recreation and amenity space on a building rooftop that incorporates a mix of hard and soft landscaping and open space.

For the purpose of Section 1.7.7(3) only, a rooftop garden also means a space that:

Requirement	Proposed roof garden
a. is not located on a podium or in a building height transition;	The proposed roof garden is not located on the podium or within a building height transition area.
b. includes communal open space and does not include private open space;	The roof garden is proposed exclusively for communal open space and does not include any private open space.
c. includes a minimum soft landscaping area of 15% of the rooftop;	The rooftop is proposed with an area of 689m ² , with 150m ² or 21.7% of that area proposed as soft landscaping.
d. may only include the following structures: i. lift shaft and stairway; ii. pool or spa including any elevated deck, platform or floor level; iii. roofed structures and fully enclosed structures: A. lobby or foyer; B. shade or shelter structure; C. internal communal recreation space; D. toilets, bathrooms, showers and change room facilities; E. a structure accommodating a Bar or Food and drink outlet if in	The roof garden includes the following allowable structures: - lift and stairway; - pool; - enclosed roof structure incorporating: - foyer; - internal communal recreation space; - toilet, shower and change room; - air conditioning plant room. The roof garden does not include any accommodation activities.



the Mixed use zone or a zone in the Centre zones category where the premises does not contain accommodation activities; F. a structure accommodating building plant, equipment or a meter room;	
e. meets the following parameters for structures mentioned in (d): i. maximum height above the rooftop of: A. 3.5m for a pool, spa and any elevated deck, platform, walkway or floor level (excluding safety barriers up to 1.8m where not tinted); B. 3.5m where setback less than 3m from the outermost projection of the rooftop; C. 6m where setback a minimum 3m from the outermost projection of the rooftop; ii. maximum combined total footprint of 40% of the rooftop for all roofed structures (excluding lift shaft and stairway); iii. maximum combined total gross floor area of 20% of the rooftop for all fully enclosed structures (excluding lift shaft and stairway).	All elements within the roof garden are contained within a maximum height of 3.5m. The total roofed area for structures within the roof garden is 272m² (295m² – 23m² for stairs and lift shaft), representing 39.5% of the total roof area. The combined gross floor area for the rooftop area, excluding stairs, lifts and plant room, is 80m² or 11.6% of the roof area.

BCC REQUEST 2 – SETBACKS

The side boundary setbacks to the habitable spaces and balconies for proposed Levels 1, 2, 3 and 4 are all significantly less than the 5m setback required by the Centre or mixed use code. It is considered that the proposed side boundary setbacks do not achieve adequate

building separation and consideration for future development of the adjoining sites and provide limited access to light and breezes for the residential uses.

- a) Increase the side boundary setbacks to all balconies and terraces on Levels 1, 2, 3 and 4 commensurate to the relevant assessment benchmarks; and*
- b) Provide a plan detailing the separation distance between the proposal and adjoining buildings with specific identification of separation between balconies and habitable rooms/openings on each property and screening where required.*

APPLICANT'S RESPONSE

The architectural plans have been amended in response to this item.

The building setbacks proposed by this application reflect the emerging character of the Racecourse Road precinct.

The nearest recent approval to the subject site is the development at 128 Racecourse Road (BCC Ref: A006790424), located diagonally opposite. Above the podium level, that development was approved with setbacks to the northern side boundary of 2m to balconies and 3m to building walls. Setbacks to the southern side boundary comprise 1.697m to the services balcony and 2.190m to building walls.

By comparison, the proposed development provides side boundary setbacks of 2.5m to balconies and 3m to building walls. The subject site is adjoined to the north and south by commercial buildings with no residential components requiring specific amenity or privacy consideration. The design of the façade interfacing with the side boundaries will facilitate opportunities for suitable separation between balconies, habitable rooms and openings for future residential developments over those properties.

With respect to part (b), the amended floor plans for Levels 1 to 4 dimension the separation distance from each balcony, terrace and building wall to the side boundaries and annotate the screening proposed (including lightweight steel and masonry screens and opaque glazing) where required. As the adjoining properties to the north and south are single and two storey commercial buildings, with

the southern building being constructed to the common boundary, there are no existing balconies or habitable room openings on those sites to which separation distances can be measured.

BCC REQUEST 3 – SETBACKS (CONT.)

The rear boundary setback provided to the development does not achieve 6m to the ground level and 7m to the upper levels as required by the Racecourse precinct neighbourhood plan code. In its current form, the rear setback does not enable existing and future buildings to be well separated from each other in accordance with PO2 of the Racecourse precinct neighbourhood plan code.

- a) Increase the rear boundary setback commensurate to the requirements of the assessment benchmarks; and*
- b) Provide a plan detailing the separation distance between the proposal and adjoining buildings with specific identification of separation between balconies and habitable rooms/openings on each property and screening where required.*

APPLICANT'S RESPONSE

The rear boundary setback proposed is 4m, with a minimum 4.5m setback to the balustrades of the rear facing balconies. A deep planting zone is proposed along the full length of the rear boundary (refer Drawing A.02.03 and the Development Data sheet A.01.01). While this does not achieve the acceptable outcome for setbacks nominated by the Racecourse precinct neighbourhood plan code, the outcome sought by PO2 is achieved for the following reasons.

The rear adjoining property is currently vacant. Having regard to the proposed zoning changes foreshadowed by Council, under which the property is proposed to transition to the Low-medium density residential (3 or 4 storey) zone through the *More Homes Sooner low-medium density residential design amendment package*, it is reasonable to anticipate that the future built form of the site will be reconsidered as part of any redevelopment proposal.

It is also relevant that the subject site shares its rear boundary with the side boundary of 50 Beatrice Terrace. Accordingly, any future

redevelopment of that property would present a side elevation towards the subject site rather than a rear elevation. With the substantial deep planting provided along the full length of the subject site's rear boundary, the proposed interface provides a greater degree of separation than would typically be expected between two properties sharing a side boundary, assisting in mitigating potential privacy impacts.

Screening is proposed along the rear boundary to ensure that the privacy and amenity of future residents within the proposed development and adjoining sites are appropriately protected.

With respect to part (b), the separation distance from the rear boundary is dimensioned on the amended floor plans for each level and the screening proposed is annotated on those plans. As the adjoining rear property is currently vacant, there are no existing balconies or habitable room openings to which separation distances can be measured.

The proposed interface with the rear adjoining LMR-zoned property is consistent with the form of development established by recent approvals along the eastern side of Racecourse Road. Notable examples include 77 Racecourse Road (BCC Ref: A006992584) and 71 Racecourse Road (BCC Ref: A006915450), both of which provide a 4m setback to adjoining LMR-zoned land, with deep planting incorporated within the intervening area. These approvals demonstrate Council's acceptance of this form of interface between higher density development and adjoining lower density residential land.

BCC REQUEST 4 – SERVICES

The proposal does not denote the locations of services, such as fire hydrant boosters, mailboxes air-conditioning units, etc. The location of the services is an important consideration and may impact the streetscape visual amenity and landscaping and private open space provisions. Accordingly, the development has not adequately demonstrated compliance with the relevant provisions of the Centre or mixed use code. Provide amended plans demonstrating a design which provides the locations of all services in accordance with the Centre or mixed use code.

APPLICANT'S RESPONSE

The amended architectural plans now denote the location of all services. As shown on the amended Ground Floor Plan (Drawing A.02.03), the fire hydrant booster, water meter and gas meter are located at the southern end of the Racecourse Road frontage and integrated into the building line. The communications cupboard is located within the entry and the letterboxes and parcel lockers are provided within the covered entry adjacent to the foyer. Refuse storage is fully internalised (refer Items 15 and 16).

The services have been deliberately sited and integrated into the building design so that they do not detract from the streetscape, landscaping or private open space provisions, in accordance with the relevant provisions of the Centre or mixed-use code.

BCC REQUEST 5 – STREET AWNING

It is difficult to determine the extent and height of the proposed street awning on the architectural plans provided and its compliance with the relevant assessment benchmarks of the Centre or mixed use code and Racecourse Road neighbourhood plan code.

- a) Amend the proposed architectural plans to clearly define the extent of the awning and provide height dimensions on the elevations.*
- b) Demonstrate that a continuous awning can extend across the full frontage to ensure adequate pedestrian shelter. NB: There is an existing street tree with a large canopy within the verge. Any street awning will need to be designed to minimise the long term impacts, health and viability of this street tree. An arboriculturally impact assessment may be required, refer to the Street tree item of this letter for further detail.*

APPLICANT'S RESPONSE

The amended architectural plans clearly define the extent of the proposed street awning. The awning extent is denoted on the amended Ground Floor Plan (Drawing A.02.03, 'line of awning over') and shown with height dimensions on the amended Elevations (Drawing A.04.01), extending across the Racecourse Road frontage to provide continuous pedestrian shelter.

The awning has been designed having specific regard to the mature Poinciana street tree within the verge. The extent and height of the awning have been coordinated with the attached Arboricultural Impact Assessment prepared by Trees Are Cool, to maximise pedestrian shading while maintaining the tree canopy and minimising long-term impacts on the health and viability of the street tree. Refer also to the response to Item 21.

BCC REQUEST 6 – *LAWFUL POINT OF DISCHARGE (LPD)*

The kerb and channel has been nominated as the LPD for the development, however, this is not considered to be an adequate solution. Submit revised conceptual engineering plans showing the site discharges into a new stormwater gully pit on the Racecourse Road frontage of the site, which is connected into the existing stormwater gully further south along Racecourse Road; in accordance with PO3 of the Stormwater code.

APPLICANT'S RESPONSE

This item is addressed by vT Consulting Engineers (vTCE) in the attached updated Engineering Report and Stormwater Management Plan and the accompanying Information Request Response Letter.

The subject site comprises two lots, being Lot 2 and Lot 3 on RP33692. The existing roof water from both lots discharges to the kerb and channel fronting the site on Racecourse Road, while surface water from the balance of the site flows over the rear boundary as sheet flow. It is proposed that stormwater runoff from the development will be discharged in a manner consistent with these existing arrangements. Roof water will discharge to the kerb and channel at no more than 30L/s from each lot and surface water from the rear deep planting area will continue to discharge to the rear as sheet flow at less than pre-development flows.

Section E of the updated Stormwater Management Plan provides rational method calculations for the pre and post-development scenarios. Updated civil plans P400 and P401 show the pre and post-development catchment layouts. On this basis, the development will not cause adverse impacts or actionable nuisance to surrounding properties and the kerb and channel is considered to remain an

appropriate lawful point of discharge for the development, achieving the outcome sought by PO3 of the Stormwater code.

BCC REQUEST 7 – SERVICE AND REFUSE COLLECTION VEHICLE ACCESS AND MANOEUVRING

The proposed plans and swept path plans provided, lack sufficient detail and do not suitably demonstrate safe access and manoeuvring for service vehicle and refuse collection vehicles on and off site in accordance with PO3 of the Transport access parking and servicing code (TAPS code).

- a) Submit revised plans providing a standard B2 driveway splay on the southern side of the crossover.*
- b) Submit revised plans showing a 2.0m (width) x 5.0m (depth) sight splay on the exit site of the driveway crossover.*
- c) Submit revised ground level plans which accurately show dimensions for the widths provided throughout the servicing areas on the ground level.*
- d) Submit revised RPEQ certified swept path plans showing that the clearance envelope for RCV movements into and out of the site which does not conflict with any obstructions including but not limited to the bus zone, parked cars, the existing kerb build out and awning support for 121 Racecourse Road.*

APPLICANT'S RESPONSE

The amended Ground Floor Plan (Drawing A.02.03) provides a standard Type B1 driveway splay on the southern side of the crossover. Although this does not provide the Type B2 driveway splay requested by Council, the attached Traffic Impact Statement demonstrates that the proposed Type B1 splay will allow standard vehicles, medium rigid vehicles and refuse collection vehicles to safely enter and exit the subject site.

A 2.0m x 5.0m pedestrian sight splay is now shown (hatched) on the exit side of the driveway crossover.

The amended ground level plan accurately dimensions the widths provided throughout the ground level servicing areas.

The attached updated RPEQ certified swept path plans prepared by Rydenskild Traffic Engineering (RTE), demonstrate that the clearance envelope for RCV movements into and out of the site does not conflict with any obstructions, including the bus zone, parked vehicles, the existing kerb build-out and the awning support at 121 Racecourse Road (refer Figures 4.11–4.14 and Section 6 of the traffic report).

BCC REQUEST 8 – SERVICE AND REFUSE COLLECTION VEHICLE ACCESS AND MANOEUVRING (CONT.)

A review of the proposed plans has identified the internal two-way aisle where trafficked by the RCV is only 6.2m wide and the provided swept path analysis does not demonstrate a kerb-to-kerb turning radius of 9.757m. In addition, the potential future on-street parking to the north of the proposed crossover may conflict with the RCV swept path. In its current form, the development has not demonstrated compliance with PO8 of the Infrastructure design code, PO1 and PO19 of the TAPS code.

- a) Provide an updated RPEQ endorsed swept path analysis demonstrating a RCV as per BSD 3008-2 can safely and efficiently service the site. The swept path must utilise a 6s lock to lock time and a kerb-to-kerb turning radius of 9.757m.*
- b) Demonstrate the entire two-way aisle/carriageway where trafficked by the RCV has a minimum width of 6.5m.*
- c) Ensure the revised RPEQ endorsed swept path analysis does not show any conflict between the RCV manoeuvring area and any potential obstructions such as vehicle parking, the bus loading zone, signage, and the existing kerb build out and awning support within the adjacent frontage of 121 Racecourse Road.*

APPLICANT'S RESPONSE

This item is addressed by RTE in the attached updated Transport Impact Statement. An updated RPEQ endorsed swept path analysis has been prepared using the BSD 3008-2 RCV with a 6-second lock-to-lock steering time and a 9.757m kerb-to-kerb turning radius. The revised layout provides a minimum 6.5m wide two-way aisle along the full length of the RCV travel path and the swept path analysis demonstrates clearance from on-street parking, the bus loading



zone, signage, the existing kerb build-out and the awning support at 121 Racecourse Road. The development therefore accords with PO8 of the Infrastructure design code and PO1 and PO19 of the TAPS code.

BCC REQUEST 9 – SERVICE AND REFUSE COLLECTION VEHICLE ACCESS AND MANOEUVRING (CONT.)

The proposed plans show a service vehicle height clearance of 3.6m, which is based upon the proposed performance solution for service vehicles only up to an SRV being able to access and provide on-site servicing. Whilst it is acknowledged that a performance solution for an MRV design service vehicle would be appropriate compared to the standard occasional service which is an LRV; the proposed reduction to an SRV is not supported. In its current form, the development has not demonstrated compliance with PO18 and PO19 of the TAPS code. Submit revised plans showing a minimum height clearance of 4.5m, to allow for an MRV to service the site.

APPLICANT'S RESPONSE

The plans have been amended to respond to this item in full. The amended Ground Floor Plan (Drawing A.02.03), provides an MRV standing area with a minimum height clearance of 4.5m, allowing an MRV to access and service the site in accordance with PO18 and PO19 of the TAPS code. The previously proposed SRV-based performance solution is no longer relied upon. This is confirmed at Section 6 of the enclosed Transport Impact Statement.

BCC REQUEST 10 – PARKING

The proposed plans show a service vehicle height clearance of 3.6m, which is based upon the proposed performance solution for service vehicles only up to an SRV being able to access and provide on-site servicing. Whilst it is acknowledged that a performance solution for an MRV design service vehicle would be appropriate compared to the standard occasional service which is an LRV; the proposed reduction to an SRV is not supported. In its current form, the development has not demonstrated compliance with PO18 and PO19 of the TAPS code. Submit revised plans showing a minimum height clearance of 4.5m, to allow for an MRV to service the site.

APPLICANT'S RESPONSE

Refer to the response to Item 9. The amended plans provide a minimum height clearance of 4.5m to the on-site service vehicle standing area, allowing an MRV to service the site.

BCC REQUEST 11 – *PARKING (CONT.)*

Provide revised plans showing a PWD parking bay as required by the development in accordance with PO15 of the TAPS code PO15, the TAPS planning scheme policy section 7.9, and the AS2890.6.

APPLICANT'S RESPONSE

The amended Ground Floor Plan (Drawing A.02.03) provides a dedicated PWD parking bay (Bay V1) at ground level adjacent to the lift core, comprising a 2.4m wide bay (5.4m long), with an adjoining 2.4m shared area and bollard. As confirmed by Rytenschild Traffic Engineering, the bay is designed in accordance with AS2890.6, PO15 of the TAPS code and section 7.9 of the TAPS planning scheme policy.

BCC REQUEST 12 – *PARKING (CONT.)*

While the traffic report proposes for bicycle parking to be provided in accordance with the Australian Standards, the bicycle parking rates must be provided in accordance with PO4 and PO5 TAPS code and TAPS planning scheme policy section 11. Submit revised plans showing bicycle parking provided in accordance with the TAPS code and TAPS PSP provisions. Provide (2) of the visitor bicycle parking spaces on the ground level adjacent to the street.

APPLICANT'S RESPONSE

The amended plans provide bicycle parking in accordance with the rates in the TAPS code and TAPS planning scheme policy section 11. Eighteen secure resident bicycle parking spaces (nine within each basement level) are provided across the two basement levels and four visitor bicycle parking spaces ('V. BIKE 1-4') are provided at ground level adjacent to the street frontage, exceeding the two ground-level bicycle spaces requested by Council. This provision is confirmed as compliant with the TAPS planning scheme policy at Section 7.0 of the enclosed Transport Impact Statement.

BCC REQUEST 13 – *EXTERNAL SIGNAGE AND PAVEMENT MARKING PLAN*

The site frontage currently accommodates a bus zone, metered on-street car parking spaces, and signage. A signage and pavement marking plan has not been submitted to demonstrate how the existing assets would be maintained. An assessment to determine a suitable location for the existing metered on-street car parking spaces to be relocated as part of this development is required to demonstrate compliance with PO3 of the TAPS code and TAPS planning scheme policy.

- a) Submit a signage and pavement marking plan signed by an RPEQ to demonstrate how existing kerbside assets would be maintained following the proposal and in conjunction with the proposed driveway crossover; in accordance with PO3 of the TAPS code.*
- b) Demonstrate a suitable location (or locations) which would allow for the existing metered on-street car parking spaces to be relocated to.*
- c) The proposed signage and pavement marking outcomes are to be carried over to the revised proposed swept path plans to demonstrate how safe access and manoeuvring would be maintained.*

APPLICANT'S RESPONSE

This item is addressed by RTE in the attached Transport Impact Statement at Section 5.2 (Kerbside Signage and Pavement Marking). In response to each part:

- a) A revised RPEQ certified signage and pavement marking plan has been prepared and is provided at Figure 5.2 of the Transport Impact Statement. The plan denotes the proposed vehicle crossover, the revised extent of the bus stop, the proposed replacement kerbside parking space and the relocation of the existing pedestrian warning sign to the southern side of the crossover, clear of the proposed access, demonstrating how the existing kerbside assets will be maintained in conjunction with the proposed driveway crossover in accordance with PO3 of the TAPS code.

- b) As shown on Figure 5.2, the proposed crossover requires the removal of existing kerbside parking and a minor reduction to the southern end of the existing bus stop. A replacement kerbside parking space is proposed immediately to the north of the crossover, adjacent to the revised bus stop extent, retaining metered kerbside parking within the site frontage.
- c) The proposed signage and pavement marking outcomes have been carried over to the swept path assessment provided at Figure 5.3, which demonstrates that a bus can safely depart the revised bus stop while a vehicle is parked within the proposed replacement parking space. The revised kerbside arrangements therefore maintain safe access and manoeuvring.

BCC REQUEST 14 – RAMP HOLDING LINES

The proposed plans and traffic report do not show the location of holding lines as required to be demonstrated in accordance with PO15 of the TAPS code. Submit revised plans showing holding lines throughout the carpark and basement areas, which are suitably located to ensure that the hold points will not obstruct passing movements, and vehicles passing in opposite directions will be able to observe and pass one another safely.

APPLICANT'S RESPONSE

The amended architectural plans show vehicle holding lines located so that the hold point does not obstruct passing movements and vehicles travelling in opposite directions are able to observe and pass one another safely.

BCC REQUEST 15 – BIN STORAGE AND TRANSFER

Only one 'Refuse' room has been demonstrated on the proposed plans for the mixed use development. In addition, the 'Refuse' room has an 'L' shaped design which does not provide sufficient area or easy access to each individual bin. In its current form, this design does not comply with PO32 of the Multiple dwelling code, PO63 of the Centre or mixed use code, and PO8 of the Infrastructure design code.

- a) *Provide amended architectural plans demonstrating a residential refuse room that has a minimum internal area of 23m² (internal dimension of 10m x 2.3m). NB: For example; the above refuse storage room can be achieved by extending the proposed 'Refuse' room by converting the PWD, the empty room adjoining it and a minor increase into the lobby.*
- b) *Provide amended architectural plans demonstrating a separate refuse storage room for the developments non-residential use that has a minimum internal area of 5.2m² (internal dimension of 4m x 1.3m). The non-residential bins must be stored and collected separately from the residential bins.*

APPLICANT'S RESPONSE

The amended Ground Floor Plan (Drawing A.02.03) provides an enlarged, regular-shaped dedicated residential refuse room ('REFUSE 1 – RES BINS') of 8.0m x 2.49m, providing direct and easy access to each individual bin. It is noted that this area is marginally less than requested by Council, although it is also noted that the number of residential units proposed by this application has decreased from 17 to 15. As such, the 10 bins to be stored within this area are more than sufficient to service the 15 proposed residential units.

A separate refuse storage room ('REFUSE 2 – NON-RES BINS') of 1.8m x 4.66m (approximately 8.4m²) is provided for the non-residential uses, exceeding the minimum 5.2m² nominated by Council. The non-residential bins will be stored and collected separately from the residential bins.

BCC REQUEST 16 – BIN STORAGE AND TRANSFER (CONT.)

The transfer path for the 'Retail' tenancies to take their refuse to the refuse room is via the public realm, with no internal transfer path provided. This outcome does not comply with PO8 of the Infrastructure design code. Provide amended plans which demonstrate the non-residential refuse transfer path is solely internal and easily accessible.

APPLICANT'S RESPONSE

The amended Ground Floor Plan provides a rear corridor for the commercial tenancies, which will allow access to the refuse room without travelling through the public realm, in accordance with PO8 of the Infrastructure design code.

BCC REQUEST 17 – OVERLAND FLOW FLOOD IMMUNITY

The proposed plans do not clearly show the level of the internal driveway aisle and basement entry in relation to the existing top of kerb level. Noting that overland flow is present within the roadway of Racecourse Road, the plans must clearly demonstrate that the internal aisle and basement entry point will be provided at a minimum height of 200mm above the top of kerb level in accordance with PO4 of the Stormwater code. Submit revised plans clearly showing that the internal aisle and basement entry point will be provided at a minimum height of 200mm above the top of kerb level, to ensure sufficient immunity from overland flow flooding.

APPLICANT'S RESPONSE

The amended plans clearly denote the relevant levels. The ground level, including the internal driveway aisle and the basement entry point, is set at RL 9.350m, while the top of kerb levels along the Racecourse Road frontage range from RL 8.840m to RL 9.010m (as annotated on Drawing A.02.03). The internal aisle and basement entry point are therefore a minimum of approximately 340mm above the highest adjacent top of kerb level, exceeding the 200mm minimum required by PO4 of the Stormwater code and providing sufficient immunity from overland flow flooding.

BCC REQUEST 18 – DEEP PLANTING

The proposed architectural plans and engineering drawings provided indicate structural basement columns and building overhang within the area proposed as deep planting to the rear of the site. These elements impede the ability for the deep planting area to support large subtropical shade trees which at maturity are complementary in scale and height to the built form and circumvents undue adverse amenity impacts to adjoining residential dwellings in accordance with PO1 and PO2 of the Racecourse precinct neighbourhood plan and PO55 and PO56 of the Centre or

mixed use code. Provide revised plans and reports which remove all subsurface and surface infrastructure including basement infrastructure and building overhang from within the proposed 4m wide deep planting area to the rear of the site.

APPLICANT'S RESPONSE

The plans and reports have been amended to remove subsurface and surface infrastructure from the deep planting area at the rear of the site. The Development Data sheet (Drawing A.01.01) confirms that 107.5m² of external deep planting (9.8%) is provided along the rear of the site and the attached updated civil engineering drawings and sections show the basement levels and associated retaining structures contained clear of this area.

BCC REQUEST 19 – CONTAINER PLANTING/VERTICAL GREENERY

It is acknowledged that containerised planting including planter boxes and green facades have been indicated on the drawings to establish appropriate subtropical planting for amenity and shading, however further details are required to demonstrate that these structures and the proposed planting will be viable long term in accordance with the applicable provisions of the Landscape works code and Landscape design planning scheme policy (LDPSP). Provide a revised Landscape Concept Plan (LCP) and additional supporting information, to confirm the long-term sustainability of proposed container planting, including:

- a) Indicate all containerised planting areas on the LCP.*
- b) Provide conceptual construction details including growing media, container size (internal widths and depths) and integration with building/structural design, as outlined in Table 1 of the LDPSP.*
- c) Provide a soil depth plan to demonstrate that the development will provide for the minimum soil depths specified for all proposed containerised planting areas as per LW and the LDPSP.*
- d) Provide a conceptual planting design completed by a specialist designer that demonstrates planting appropriate to container type, size, and location, taking into account orientation/ shading and ongoing maintenance (refer to s4, s5, s6, s10 LDPSP).*

APPLICANT'S RESPONSE

A revised Landscape Concept Plan (LCP) has been prepared by LAUDink and is attached to this response. The revised LCP responds to each matter as follows:

- a) All containerised planting areas are indicated on the planting plans for the ground floor, Levels 1–4 and the rooftop terrace (SK002–SK007).
- b) Conceptual construction details, including growing media, container sizes (internal widths and depths) and integration with the building and structural design, are provided on the Podium Planter Details (SK013), consistent with Table 1 of the LDPSP.
- c) A Planter & Podium Depth Summary Plan (SK011) is provided, demonstrating minimum soil depths across all containerised planting areas (300mm, 600mm, 800mm and 1,000mm deep planters, in addition to the deep planting zone) in accordance with the Landscape works code and the LDPSP.
- d) The conceptual planting design has been completed by specialist landscape architects and includes a plant species schedule, images and general notes (SK010), with species selected appropriate to container type, size and location, having regard to orientation/shading and ongoing maintenance.

BCC REQUEST 20 – IRRIGATION STRATEGY

The proposal does not clearly demonstrate that adequate onsite water storage can be provided to support the proposed landscape measures on the site, including container planting (e.g. location of rainwater storage tanks). 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 and the LDPSP.

APPLICANT'S RESPONSE

An Irrigation Strategy is provided on the revised LCP (refer to the Planter & Irrigation Strategy Plan (SK012)). The strategy identifies all containerised planting areas to be irrigated on each level and calculates a total irrigation demand of approximately 7,846 litres. A

rainwater storage tank with a minimum volume of 8,000 litres is proposed to harvest roof water and service the landscape irrigation demand, demonstrating that adequate on-site water storage is provided in accordance with the Landscape works code and the LDPSP. The irrigation storage tank will be located within the basement, as detailed on the amended architectural plans (refer A.02.01).

BCC REQUEST 21 – STREET TREE

The verge contains a mature Poinciana (Delonix Regia) street tree which contributes to the subtropical character and amenity of the streetscape and wider Racecourse Road Precinct as it forms part of the avenue planting design of Racecourse Road and supports significant shading to the footpath and road corridor. The provided plans indicate full width pavement and significant structure and associated building works that may impact the health and long-term viability of the street tree. The proposal is to support a building design that maintains the tree-lined streetscape and contributes to a high-quality pedestrian environment in accordance with PO2 of the Streetscape hierarchy overlay code and PO5 of the Racecourse Precinct neighbourhood plan.

- a) Provide amended plans that is accompanied by and Arboricultural Impact Assessment prepared by an AQF Level 5 Arborist that demonstrates the following:*
 - i) A redesign of the proposed streetscape outcome to create a consolidated garden bed that maximises retention of the existing softscape and supports adequate permeable growing media;*
 - ii) Clearly outline the extent of the proposed awning and ensure the awning design maximises shading for pedestrian and maintains the tree canopy.*
 - iii) Provide an Arboricultural Impact Assessment that evaluates the proposal including canopy impacts, basement construction, footpath construction and all relevant site works. The AIA is to address the following: Botanical species name of trees; Height, diameter of tree trunk at breast height and crown diameter; General health assessment and character of trees including habitat values; Identification and illustration of the Tree Protection*



Zones (TPZ) and Structural Root Zones (SRZ) of trees in accordance with AS:4970; Description of the proposed works and construction methodology to be used within TPZ of trees; Evaluation of proposed construction methodology and potential impacts on the trees; and Evaluation of any pruning works (including canopy and/or root pruning) which may be required as a result of the proposed works.

APPLICANT'S RESPONSE

An Arboricultural Impact Assessment (AIA) prepared by Chey Anglesey (Dip. Arboriculture – AQF Level 5) of Trees Are Cool, accompanies this response together with the amended architectural plans and revised LCP. In response to each matter:

- i) The streetscape design has been revised to provide a consolidated garden bed within the frontage that maximises retention of the existing softscape and supports adequate permeable growing media – refer to the Ground Floor Planting Plan (SK002) of the revised LCP.
- ii) The extent of the proposed awning is clearly outlined on the amended architectural plans and the awning has been designed to maximise shading for pedestrians while maintaining the canopy of the street tree (refer also Item 5).
- iii) The AIA assesses the mature *Delonix regia* (Poinciana) street tree (Tree T01) and addresses each of the matters listed by Council, including:
 - the botanical species; tree dimensions (height, diameter at breast height and crown spread, surveyed to sub-metre accuracy);
 - general health, structure and habitat values (Visual Tree Assessment and Burnley amenity evaluation);
 - identification and illustration of the Tree Protection Zone (TPZ, 4.8m radius) and Structural Root Zone (SRZ, 2.67m radius) in accordance with AS4970-2025 (refer Tree Protection Plan TAC-RRA-ND-TPP and Tree Protection Specifications TAC-RRA-TPS-SH01);
 - a description and evaluation of the proposed works and construction methodology within the TPZ, including vacuum excavation along the basement boundary to locate roots, footpath removal/replacement, service relocation and awning installation; an evaluation of

- impacts (moderate TPZ encroachment of >10% and ≤20%, outside the SRZ); and
- an evaluation of pruning works required.

The AIA concludes that the tree can be retained and protected, subject to implementation of the nominated tree protection measures under the supervision of the Project Arborist.

ATTACHMENTS

- Amended Architectural Plans – Profile Architecture, Issue TP8, July 2026;
- Engineering Report & Stormwater Management Plan – vT Consulting Engineers, ref vTCE-25298-ENG-D, dated 13 July 2026 (including updated civil drawing set);
- Information Request Response Letter – vT Consulting Engineers, ref 25298-L01, dated 13 July 2026;
- Transport Impact Statement – Rytenskild Traffic Engineering, RTE ref 25279, dated 30 July 2026 (including the signage and pavement marking plan at Figure 5.2);
- Revised Landscape Concept Plan – LAUDink, Job No. 2512-001, Drawings SK001–SK007 and SK010–SK013, dated July 2026;
- Arboricultural Impact Assessment – Trees Are Cool, dated 10 July 2026;

SUMMARY TABLE

Item	IR Matter	Response / Amendment	Supporting Documentation
1	Building height	Amended elevations A.04.01–A.04.04 denote ground level, the 1m above ground level line and all level datums; rooftop garden breakdown on A.01.02 (689m ² terrace, 295m ² roofed structures, 150m ² soft landscaping, 80m ² GFA).	Amended Architectural Plans (Profile Architecture, Issue TP8)
2	Side boundary setbacks	Side setbacks of 2.5m to balconies and 3m to building walls, benchmarked against the approval at 128 Racecourse Rd; separation distances dimensioned and screening annotated on the Level 1–4 plans.	Amended Architectural Plans (Levels 1–4)
3	Rear boundary setback	4m rear setback retained with full width deep planting. Minimum 4.5m to balustrades; justified	Amended Architectural Plans (A.02.03, A.01.01)



		against PO2 by reference to the approvals at 77 and 71 Racecourse Rd; screening annotated on the plans.	
4	Services	All services (hydrant booster, water and gas meters, comms cupboard, letterboxes and parcel lockers) located and integrated into the building line on A.02.03; rooftop plant contained within the enclosed rooftop structure.	Amended Architectural Plans (A.02.03)
5	Street awning	Awning extent and heights defined on A.02.03 and A.04.01; design coordinated with street tree canopy.	Amended Architectural Plans; AIA
6	Lawful point of discharge	Roof water to kerb and channel limited to 30L/s per lot and rear surface flow below pre-development rates; rational method calculations and pre/post catchment plans provided in support of retaining the kerb and channel as the LPD.	Engineering Report & SMP (vTCE-25298-ENG-D); Civil plans P400-P401; vTCE letter 25298-L01
7	Service/RCV access & manoeuvring	B1 splay, sight splay and servicing dimensions on A.02.03; RPEQ swept paths show no conflict with kerbside assets.	Amended Architectural Plans (A.02.03); Transport Impact Statement (RTE 25279)
8	RCV aisle width / swept path	RPEQ swept path (BSD 3008-2 RCV, 6s lock-to-lock, 9.757m radius); 6.5m two-way aisle; no conflict with obstructions.	Transport Impact Statement (RTE 25279)
9	Service vehicle clearance	4.5m minimum height clearance to MRV standing area provided.	Amended Architectural Plans (A.02.03); Transport Impact Statement
10	Parking – service vehicle clearance	As per Item 9.	Amended Architectural Plans (A.02.03)
11	PWD parking bay	PWD bay (V1) 2.4m x 5.4m + 2.4m shared area provided at ground level per AS2890.6.	Amended Architectural Plans (A.02.03); Transport Impact Statement
12	Bicycle parking	18 secure resident spaces (9 within each basement level) plus 4 visitor spaces at ground level adjacent to the street, exceeding the 2 ground level spaces requested.	Amended Architectural Plans; Transport Impact Statement (s7.0)
13	Signage & pavement	Addressed – revised signage and pavement marking plan at Figure	Transport Impact Statement (RTE 25279),



	marking plan	5.2 showing the crossover, the reduced bus stop extent, a replacement kerbside parking space and the relocated pedestrian warning sign; bus swept path at Figure 5.3.	Section 5.2 and Figures 5.2–5.3
14	Ramp holding lines	Vehicle hold lines shown at ground level (A.02.03) and on both basement levels (A.02.01 and A.02.02).	Amended Architectural Plans (A.02.01–A.02.03)
15	Bin storage	Separate residential (Refuse 1, 8.0m x 2.49m / 19.9m ²) and non-residential (Refuse 2, 1.8m x 4.66m / 8.4m ²) rooms. Refuse 1 marginally below the 23m ² nominated, justified by the reduction from 17 to 15 units and the 10 bins required.	Amended Architectural Plans (A.02.03)
16	Bin transfer path	Non-residential refuse transfer wholly internal via a dedicated rear service corridor.	Amended Architectural Plans (A.02.03)
17	Overland flow immunity	Ground/basement entry RL 9.350 v top of kerb RL 8.840–9.010 (approx. 340mm above).	Amended Architectural Plans (A.02.03)
18	Deep planting	107.5m ² external deep planting (9.8%); basement structure and building overhang removed from the 4m rear deep planting zone.	Amended Architectural Plans (A.01.01); vTCE civil set
19	Container planting / vertical greenery	Revised LCP with planting plans, planter depth summary, podium planter details and species schedule.	Revised LCP (LAUDink 2512-001, SK001–SK007 and SK010–SK013)
20	Irrigation strategy	Irrigation strategy provided; demand 7,846L; minimum 8,000L rainwater tank located in Basement 2.	Revised LCP (SK012); Amended Architectural Plans (A.02.01)
21	Street tree	AQF Level 5 AIA provided; tree retained; TPZ/SRZ per AS4970-2025; consolidated garden bed; awning maintains canopy.	AIA (Trees Are Cool, 10/07/2026); Revised LCP (SK002); Amended Architectural Plans

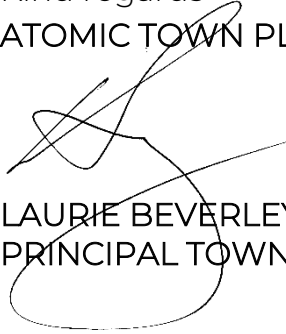
Having regard to the matters outlined in this correspondence and the information previously provided in the Town Planning Report, it is considered that the proposal achieves suitable compliance with the relevant assessment benchmarks of City Plan 2014 and that the application warrants approval by Council.

Please do not hesitate to contact me should you have any queries regarding this response or the application in general.

Thank you for your attention in this matter.

Kind regards

ATOMIC TOWN PLANNING

A handwritten signature in black ink, appearing to be 'Laurie', written over the printed name.

LAURIE BEVERLEY M. URB DEV., MPIA
PRINCIPAL TOWN PLANNER