



Dedicated to a better Brisbane

12 March 2026

Russo Custodians Pty Ltd
C/- Urbicus Pty Ltd
110 Kennedy Terrace
PADDINGTON QLD 4064

Attention: Henry Watson
Application Reference: A006831322
Address of Site: 457 ADELAIDE ST BRISBANE CITY QLD 4000

Dear Henry

RE: Further advice

Council has reviewed the response to the information request as well as the submissions received. Whilst it is acknowledged that some of the previously raised matters have been suitably resolved, some matters remain outstanding and further information is still required to demonstrate that the proposed height, bulk and scale is suitable for this site, which is only 367m² in area. All matters raised within this letter need to be suitably addressed and resolved to progress the application.

Adelaide Street Verge Width and Setback

- 1) It is acknowledged the submitted plans show the setback to Adelaide Street has been increased. However, the proposed setback is still not sufficient and the buildings placement does not allow for a minimum 5m wide verge to be achieved to Adelaide Street, with elements of the building above and below ground level projecting into this space.

Council advises that it has not historically supported tower-level encroachments into the verge or road reserve. Such encroachments permanently limit future public domain flexibility and establish an undesirable precedent for private development within land intended to remain available for public use. While Council has, in limited and exceptional circumstances, supported limited basement encroachments, this has only occurred where a clear and robust planning justification has been demonstrated; and the encroachment delivers a demonstrable public benefit that cannot reasonably be achieved through alternative building design solutions.

Based on Council's assessment, it appears that the proposed encroachments are not necessary to achieve an acceptable built form outcome, noting the proposal is for a new building and no justification for the encroachment has been provided. The development could be reasonably accommodated entirely outside the 5m road reserve with minor design amendments, including modest internal reconfiguration and adjustments to balcony forms, without materially affecting design quality or residential amenity.

To enable Council to continue its assessment, and to progress the application, please provide:

- a) Amended plans which demonstrate an increase in the setback of the building, so that all levels are located outside of the required 5m verge width. Council could support the building being built to the new Adelaide Street front boundary where a 5m wide verge is achieved with no building encroachments at ground level or above.
- b) Where any aspect of the basement is still proposed to encroach into the 5m verge width, it must be clearly demonstrated why the encroachment is necessary and cannot be avoided through reasonable changes to the built form and design. From Council's review of the plans, it appears the currently proposed basement encroachment only serves to

provide access to the substation indicated on the Lower Mezzanine, although it appears that suitable access could be achieved without any basement encroachment.

- c) Should it be sought to retain any basement encroachment beneath the verge, Council advises that the following minimum requirements must be met:
- A minimum clear height of 4.5m to the public thoroughfare easement, measured from finished ground level to the awning/building above; and
 - A minimum soil depth of 1.5m above the basement structure to support to delivery of infrastructure, landscaping and street tree planting.

Development Site Area and Documentation

- 2) While some amendments and additional justification have been made, including efforts to demonstrate how adjoining sites could be developed, there remain a number of unresolved items which were previously raised, as detailed below.
- a) Submit floor plans, elevations and cross-sections showing the proposed development, the built to boundary walls and the layouts of habitable rooms/spaces and all windows, balconies and opening of the adjoining developments along the common boundaries. These details must be accurately shown for each level to demonstrate potential adverse privacy and amenity impacts have been mitigated,
 - b) Incorporate privacy screening to all balconies and windows on all levels where mitigation may be required. This must include all balcony edges and glazing oriented towards the side boundaries and increasing landscape planter depths to 1.5m would assist.
 - c) Clearly indicate and annotate the proposed finishes on any built to boundary walls that extend above or beyond the adjoining built to boundary walls.
 - d) Review and provide accurate shadow diagrams showing solar impacts in the month of June. On Council's review it is not clear whether the AM shadows are accurate.
 - e) It is anticipated that the formal dining rooms within the proposed development would have limited access to natural light, should adjoining sites be developed. Further consideration should be given to removing walls between the living and formal dining to ensure sufficient access to natural light is maintained.

Wind Impacts

- 3) It is acknowledged that a wind impact report has been prepared and submitted. The report presents a desk top review and no wind tunnel testing has been carried out and therefore this will be conditioned in any potential future approval. The results of the report indicate the development has incorporated several design features to mitigate wind impacts on outdoor trafficable areas. It was recommended within the report that full height louvred screens should be incorporated within balconies along the eastern façade to ensure that these areas have a level of comfort and reduced impacts of prevailing winds. However, it does not appear that these screens have been included in the architectural plans.

Provide amended plans which clearly include and show all wind mitigation strategies recommended within the Wind impact report, have been incorporated into the buildings design.

Water Storage for Irrigation

- 4) The proposed containerised planting throughout the building is supported 'in principle'. However, the plans do not show the required water storage tanks (size or location) as referenced in the information response.

Provide amended architectural and landscape plans that clearly indicate the location and size of the irrigation water storage tanks. Note that the tank size may affect the number of car parking spaces or the footprint of the rooftop terrace. In addition, provide the following information:

- a) Detailed estimates of required water consumption for irrigation prepared by a qualified irrigation specialist endorsed by Irrigation Association of Australia.
- b) Proposed size and location of rainwater catchment capable to supply at least 95% of the irrigation needs.

Flood Levels

- 5) It has not been demonstrated the proposed stacker electrical controls meet the required minimum level for essential electrical services which is 5 metres AHD. Given the constraints of the site and floor plate, it is important these elements are shown on the plans now to ensure they have been suitably factored into the design. Therefore, indicate on amended plans the location of the stacker electrical controls and their levels, ensuring flood immunity is achieved.

Fuel Burning

- 6) It is acknowledged that a condition has been requested to be set for maximum fuel burning. However given the constraints of this small site and the resultant floor plates, it is unclear how fuel burning could be provided in the future if it is not suitably considered now and any addition of fuel burning in the future would require a change to the development, regardless of a condition applied by Council now. It is therefore strongly recommended to:
- a) Investigate and confirm the potential fuel burning / back-up generator requirements now.
 - b) Clearly indicate the location of fuel burning / back-up generator on the plans to ensure that it can be accommodated within the building.
 - c) Provide further information on maximum fuel burning capacity in MW; potential hours of use, type and quantity of fuel stored, air quality controls and type of engine.

Exhausts

- 7) The information response details that adequate separation from basement exhausts will be achieved, however insufficient detail has been provided to confirm this. Submit amended plans (particularly Sections Sheet 1, Drawing no.: 12829_301) to demonstrate that a minimum 15m separation distance is achieved from the basement exhaust points to onsite dwellings and their air intake points.

Construction Management Plan

- 8) The submitted construction management plan (CMP) does not comply with the requirements of the Development Services - Construction Management Guidelines - Brisbane Central Business District and City Frame. Provide an amended Draft CMP that complies with the requirements as set out in the guidance document regarding road and footpath closures. This document can be found on Councils Website. Please note that any proposed footway closures on Adelaide Street are unlikely to be supported.

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

Yours sincerely



Dominic Hudson
Senior Urban Planner
Planning Services North
Phone: (07) 3178 0229
Email: Dominic.Hudson@brisbane.qld.gov.au
Development Services
Brisbane City Council