

17 September 2026

Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

Attention: Ms Laura Urbina, Senior Urban Planner

Dear Laura,

RESPONSE TO BRISBANE CITY COUNCIL'S FURTHER ADVICE – S.35 OF THE DA RULES

DEVELOPMENT PERMIT FOR MATERIAL CHANGE OF USE FOR MULTIPLE DWELLING (88 UNITS), SHORT-TERM ACCOMMODATION AND CENTRE ACTIVITIES (SHOP AND FOOD AND DRINK OUTLET), DEVELOPMENT PERMIT FOR MATERIAL CHANGE OF USE WITHIN THE FLOOD OVERLAY, AND DEVELOPMENT PERMIT FOR CARRYING OUT BUILDING WORK WITHIN THE FLOOD OVERLAY, OVER LAND AT 22-24 SYLVAN ROAD, TOOWONG (LOT 2 ON RP69784 AND LOT 1 RP196515)

COUNCIL REFERENCE: A006913504

Mewing Planning Consultants act on behalf of Immerse Projects 17 Pty Ltd (**the Applicant**) in relation to the site at 22-24 Sylvan Road (**the site**).

We refer to the correspondence from Brisbane City Council (**Council**) dated 10 July 2026 constituting a Further Advice Letter, pursuant to Section 35 of the *Development Assessment Rules (DA Rules)*.

Please accept this correspondence, on behalf of the Applicant, as a response to the Further Advice Letter, providing additional information in respect of the development application. We advise that Council should proceed with the assessment of the development application on the basis of the new information present in this response.

Changes made to the development, as part of this correspondence, have been made in direct Response to Council's Further Advice letter, and therefore pursuant to section 26.1 of the DA Rules the changes do not stop the assessment period.

The following attached response extracts each part of Council's Further Advice Letter and provides a corresponding response. The response includes the following documentation:

- **Attachment A** – Brisbane City Council Further Advice Letter;
- **Attachment B** – Revised Architectural Plans, prepared by MAS;
- **Attachment C** – Revised Landscape Plans, prepared by Ivy May Landscape Architects;
- **Attachment D** – Revised Flood Risk Assessment (**FRA**), including the Flood Emergency Management Plan (**FEMP**), prepared by Allan & Dennis;
- **Attachment E** – Revised Traffic Assessment, prepared by Bitzios; and
- **Attachment F** – Revised Waste Management Plan, prepared by MLEI (formerly MRE Environmental).

- **Attachment G** – Revised Engineering Services Report, prepared by Friends Civil Engineering
- **Attachment H** – Revised Stormwater Management Plan, prepared by Friends Civil Engineering

We would welcome the opportunity to discuss any aspect of this Further Advice Response. Should you wish to discuss, please contact me on 0403 155 291 or at nicole.boulton@mewing.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Boulton', with a stylized initial 'N'.

Nicole Boulton
Associate Director
Mewing Planning Consultants

Introduction

The following correspondence provides a response to Brisbane City Council's (**Council**) Further Advice Letter dated 10 July 2026. The correspondence has extracted each part of Council's Further Advice Letter in italicised text and provides a corresponding response below.

At the outset, we note that the Applicant has made a range of design changes in response to Council's comments, including through engagement with Council officers. The following provides a context to the site and the proposed changes (with further detail in the specific item responses).

Building Setbacks and Privacy

Item 1

While the revised design includes amended setbacks, the privacy concerns identified in the Information Request have not been adequately addressed. Additional side-facing balconies have been introduced, and eastern setbacks have been reduced to 3m, where setbacks were previously 4.2m-4.5m. Provide the following:

- a) *Screening to all side-facing balconies located less than 4.5m from a boundary.*
- b) *Revised balustrade treatments capable of improving privacy outcomes, such as battened, perforated or comparable privacy screens.*
- c) *Details of any privacy and sun-shading measures, including drop-down blinds where proposed.*
- d) *Where habitable rooms or balconies are located within 4.5m of the eastern boundary and are not screened by solid walls, demonstrate how the design will achieve the privacy outcomes of the City Plan. Integrated privacy screening measures may be required.*

Response

In response to Council's Further Advice notice, the privacy matters identified by Council have been addressed through targeted amendments to the architectural design, as outlined below and as presented in the revised Architectural Plans (**Attachment B**).

In respect of item a), the proposed development has only one side-facing balcony on each level above Level 5 which has a setback of less than 4.5m from the eastern boundary. This balcony, which is centrally located on the eastern elevation, has been provided with both vertical and horizontal screening (refer to **Figure 1** for a plan view and **Figure 2** for the elevation view).

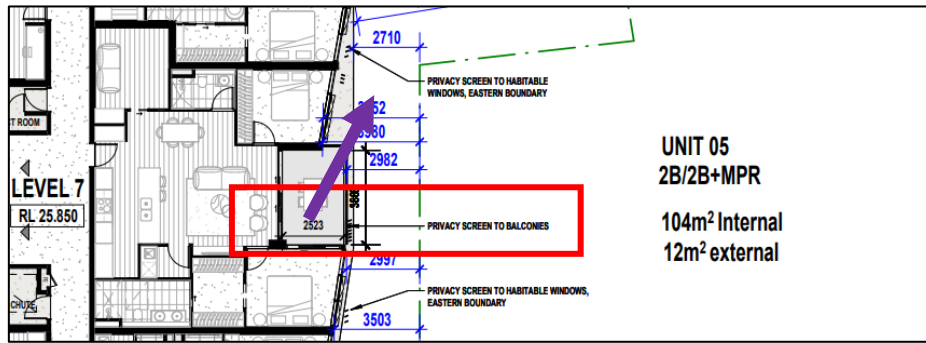


Figure 1: Plan view of privacy screening to balcony within 4.5m of the side boundary (MAS, 2026)



Figure 2: Elevation view of privacy screening to balcony within 4.5m of the eastern boundary (MAS, 2026)

The position of the screening, together with the balustrade treatments and the recessing of the facade to the north of the balcony, provide a design which encourages the outlook from the balcony to the north, along the side boundary rather than across it, as shown by the purple arrow in **Figure 1**. This outcome appropriately addresses the nature of the interface, and the desired privacy outcome.

The screening is integrated with the balcony design and provides an appropriate response to potential overlooking without unnecessarily restricting access to light or natural ventilation. These treatments also provide additional visual screening to the adjoining interfaces while maintaining the architectural expression and openness of the building and acting as a feature to the façade.

It is noted that there is an additional balcony which is within 4.5m of the eastern boundary, however this has its primary orientation to the south and as such screening is not required given the orientation of this unit and its balcony. All other units have their balconies and primary orientation to the adjoining streets or benefit from a setback greater than 4.5m from the eastern boundary.

In respect of item b), the subject balcony includes both balustrade treatments that support the privacy outcome, which comprises an element of solidity to the balustrade with a design that is coherent to the broader architectural expression. The balustrade and the screening treatments have been carried through to the northern boundary as well, to provide architectural statement, visual interest and façade expression (refer to **Figure 3**).



Figure 3: Architectural intent of the balcony screening (MAS, 2026)

It is also noted that Level 5 balconies and units will be screened through the significant planting on the podium, at each relevant interface (refer to **Figure 4**).

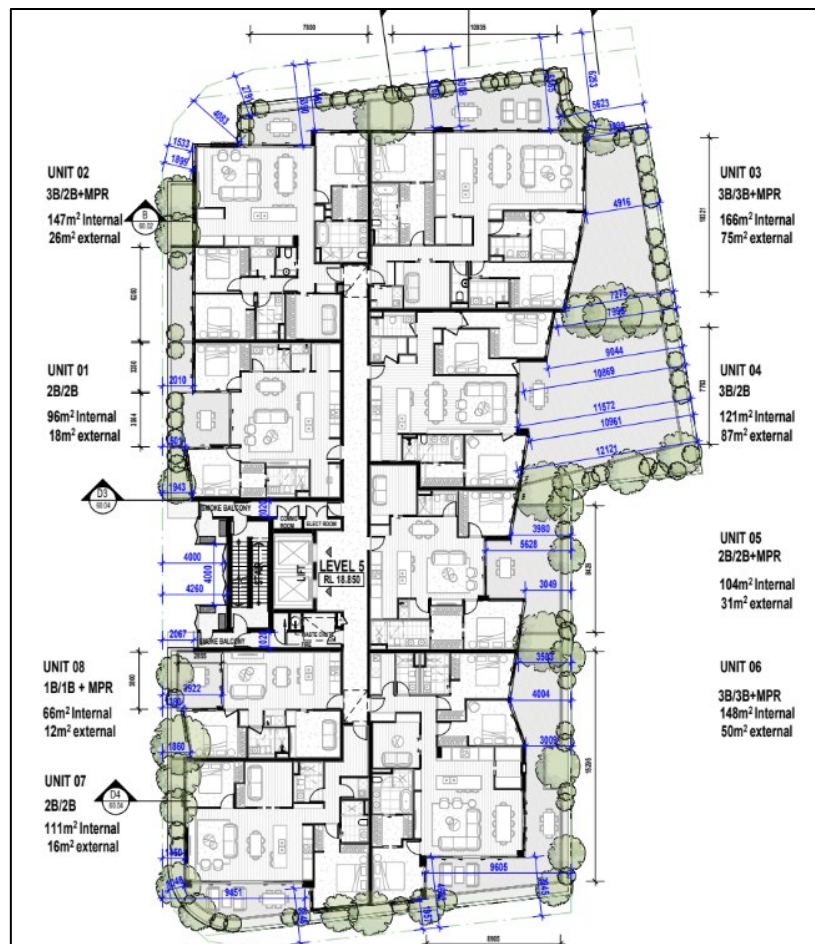


Figure 4: Level 5 floor plate showing planter landscaping (MAS, 2026)

In respect of item c), the revised design incorporates privacy and sun-shading measures to the relevant residential façades. These measures are integrated into the architectural treatment and assist in managing both privacy and solar exposure to the affected apartments. Specifically, vertical blade screens and perforated aluminium screens are provided in various locations to the Western façade (refer to **Figure 5** for the elevation view). Internal blinds will also be available to units.

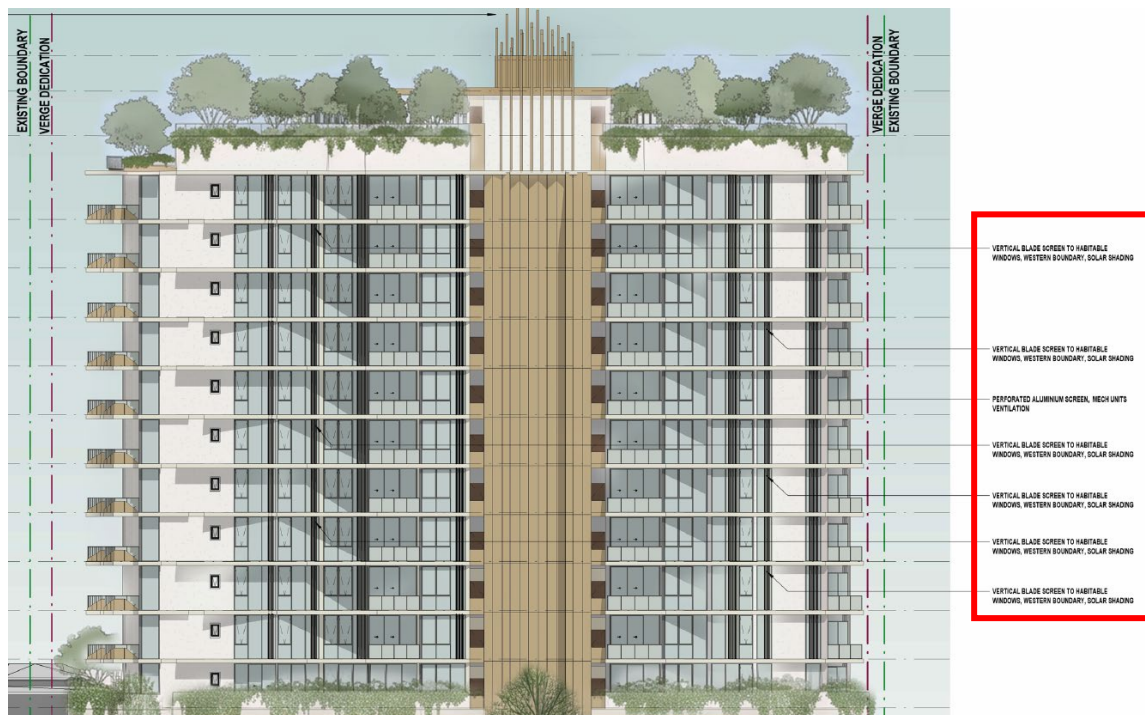


Figure 5: Solar shading / vertical blade screening devices on the western (Landsborough Tce) elevation (identified in red) (MAS, 2026)

In respect of item d), the revised design provides targeted privacy treatment to habitable rooms and balconies throughout the development. The combination of increased setbacks at relevant locations, orientation of openings and integrated screening measures manages potential overlooking to the adjoining interface while retaining appropriate access to outlook, daylight and natural ventilation.

Notably, the City Plan's principal provision relating directly to privacy in this instance is PO14 / AO14.1 of the Multiple Dwelling Code. AO14.1 provides options for achieving privacy, including compliance with building separation distances¹, or to position the primary balcony or private open space to face the street frontage or rear boundary or adjoining public open space, and offset balconies or habitable rooms so that they are positioned outside the cone of vision of existing or approved habitable rooms or outdoor spaces. The proposed development complies with all of these aspects, given the nature of the interface to the east for which there is no existing or approved tower and given the orientation and treatment of units and balconies as discussed above. The arrangements also comply with AO17.1, which minimises need for screening.

Podium Façade Design and Bulk

Item 2

While the eastern podium façade now incorporates some articulation, the overall depth, modulation and architectural expression of the podium has been reduced. The revised design

¹ Notes to the separation distance table state that 'Separation distances are intended to protect amenity and provide for private open spaces on upper levels that do not require screening for privacy' and 'considered site planning and design and strategies such as offsetting balconies, the location of private space, selective screening or other design elements can reduce building separation requirements'.

results in a bulkier podium form. It is also unclear whether some façade elements can be accommodated within the available floor plate. Provide the following:

- a) Plans demonstrating that all proposed podium planters can be accommodated without impacting podium parking.
- b) Increased façade articulation and depth capable of creating shadowing and reducing perceived building bulk.
- c) Clarification of the podium section locations and consistency with the floor plans.
- d) Removal of the podium roof structure over the nominated deep planting area, as deep planting must be open to the sky.

Item 2 Response

In respect of item a), it is noted that the podium levels include car parking and externally facing container planters, together with architectural elements that provide depth of expression and a visual interest within the streetscape. Floor plans for Levels 2-4 have been revised to include the details of the containerised planters, identifying that they are accommodated without impacting on the car parking bays (refer to **Figure 6**). The containment within site boundaries is also evident on the Podium Detail Sections within the architectural package in **Attachment B**.



Figure 6: Excerpt of existing podium (left) and proposed podium containers (MAS, 2026)



Figure 7: Excerpt of the proposed podium containers on the Landscape Plan (IvyMAS, 2026)

In respect of item b), the podium facades have been refined, with the elevations and sections updated to accurately show the extent of articulation and shadowing on the podium façade. The podium façade features a faceted, blade-like façade treatment, which projects from the façade plane to introduce depth, cast shadows and reduce the perceived bulk of the podium.

The revised drawings accurately show the variation and modulation to the podium façade compared with the previous version (refer to **Figure 8**). The projecting blade elements create a layered façade

with changing angles and shadow lines, breaking down the scale of the four-storey podium and providing greater visual interest when viewed from the street and adjoining properties.



Figure 7: Excerpt of existing podium (upper) and proposed podium (below) (MAS, 2026)

The arrangement and depth of the blade elements are further illustrated in **Figure 9**, which demonstrates how the façade treatment projects beyond the primary podium wall and creates a more articulated and visually recessive built form. This treatment is complemented by the integrated landscaping and screening shown on the revised architectural plans.

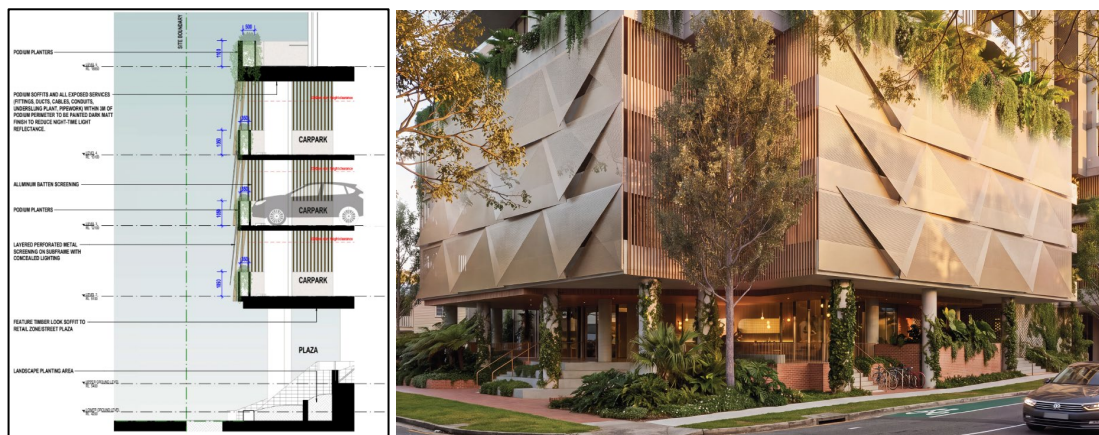


Figure 8: Podium section A (left) and render (right), which shows the projecting blade elements (MAS, 2026)

It is also particularly relevant to appreciate the strength of the ground plane design to Sylvan Road, with the quality of the public realm proposition through public terrace areas and associated landscape embellishment. This is not an insignificant design feature of the development, and provides a public benefit for the project. It is particularly notable given the need to address a range of constraints to the site, including the flood levels, road and rail interfaces, and other features. The outcome of the podium form and the ground plane must be viewed through the lens of the significant effort taken to provide a public realm and landscape outcome that is a public benefit to Sylvan Road.

In respect of item c), the plans have been updated to clarify the position of the podium section locations and consistency with the floor plans.

In respect of item d), amendments have also been made to the podium areas over the deep planting areas.

The podium floor plate has been configured to provide a minimum 4m x 4m clear opening for each deep planting area, extending to the Level 5 floor plate. It is acknowledged that the Level 6 floor

plate and above extend over portions of these areas; however, the revised arrangement maintains the 4m x 4m opening unimpeded to a height of approximately 14m.

Where elements extend over, these are a small percentage of overlaps, are elevated well above the trees, are largely related to balcony areas (not substantive building form), and relate to the northern façade such that natural light and rainfall has an ongoing ability to attend to the natural tree growth.

The outcome provides a substantial vertical opening above the planting areas, allowing for meaningful access to daylight, rainfall and sky exposure, while providing sufficient vertical clearance to support the establishment and ongoing growth of the proposed landscaping. The planting areas are also not constrained by underground services, providing an appropriate environment for the establishment of deep planting.

The revised architectural and landscape plans demonstrate the extent of the openings and the relationship between the deep planting areas and the built form above.

The deep planting areas are identified in **Figure 10** and **Figure 11**.

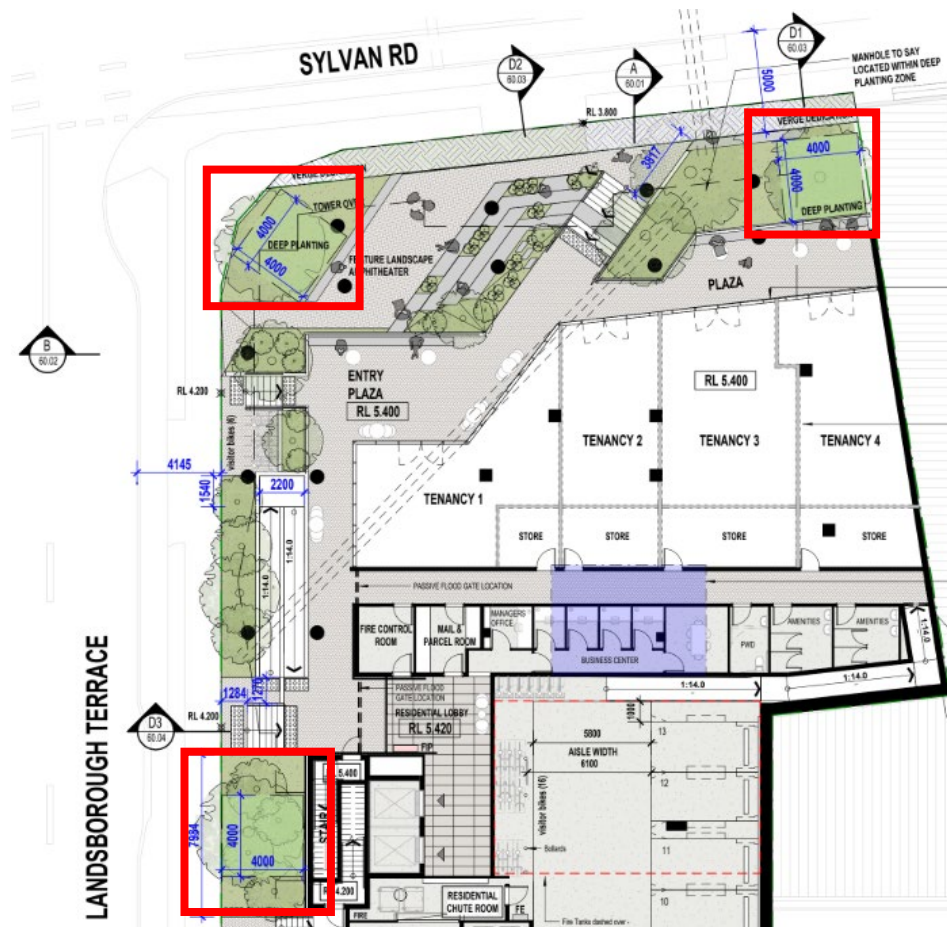


Figure 9: Deep planting areas (minimum 4m x 4m) at ground level (MAS, 2026)

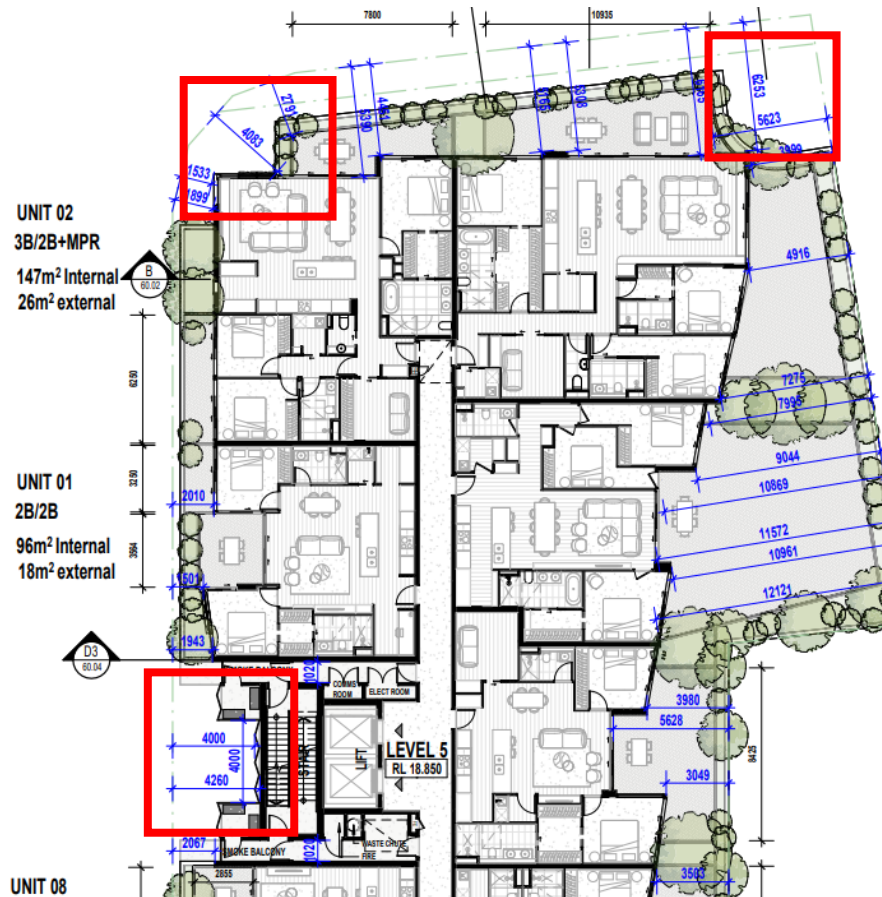


Figure 10: Deep planting areas (minimum 4m x 4m) at level 5 (MAS, 2026)

Buildings that Breathe

Item 3

The eastern and western elevations continue to contain a high proportion of glazing, with limited external shading and opportunities for natural ventilation. Provide the following:

- Louvre windows to habitable rooms.*
- Sliding screen doors where sliding doors are proposed to facilitate natural ventilation.*
- Additional solid wall elements and more substantial balustrade treatments to the western elevation to reduce reliance on glazing.*
- Details and dimensions of all slab projections, awnings and shading devices proposed to the northern and eastern elevations.*
- Further justification demonstrating how the eastern and western façades achieve the outcomes sought by the Buildings that Breathe guidelines.*

Note: Council remains concerned that the eastern elevation is overly glazed and lacks sufficient shading elements to respond to its orientation. While screening outcomes on the western elevation have improved, the façade continues to exhibit a high proportion of glazing.

Item 3 Response

The proposed development has been designed to suitably address the relevant provisions of the City Plan assessment benchmarks, including PO26 of the Multiple Dwelling Code and its corresponding acceptable outcomes, together with particular metrics of the Buildings that Breathe

Design Guide. Notably, some of the items raised in item 3 by Council are not directly derived from the assessment benchmarks. Nonetheless, appropriate design responses are proposed.

The revised architectural design incorporates operable windows to habitable rooms to provide opportunities for natural ventilation and passive cooling. These are not louvre windows for design and safety reasons at the proposed height, but maintain ability for access to ventilation.

The residential floorplates have been arranged to maximise the number of habitable rooms positioned directly on the external façade. The centralisation of the core and arrangement of the apartment layouts facilitate access to external façades, with operable windows and external openings providing opportunities to capture prevailing breezes and support natural ventilation through the apartments.

The architectural design specifically identifies full-width operable windows and doors to residential units as part of the natural ventilation strategy, together with apartment depths that facilitate the movement of light and air through the floorplate.

The provision of operable windows, in combination with the external balconies and building orientation, provides a meaningful opportunity for residents to naturally ventilate their apartments and reduces reliance on mechanical cooling.

The revised design incorporates large sliding glazed openings to the private balconies, providing a direct connection between the principal living spaces and external areas. The openings are intended to facilitate natural ventilation and strengthen the indoor-outdoor relationship of the apartments.

The balcony arrangement also provides a protected external environment adjoining the principal living areas, allowing the doors to be opened to increase natural airflow while retaining the amenity and functionality of the external living spaces.

The detailed screening treatment to sliding doors will be integrated with the balcony design to provide solar protection and privacy without unnecessarily restricting the operation of the doors or the flow of air (refer to **Figure 12**).

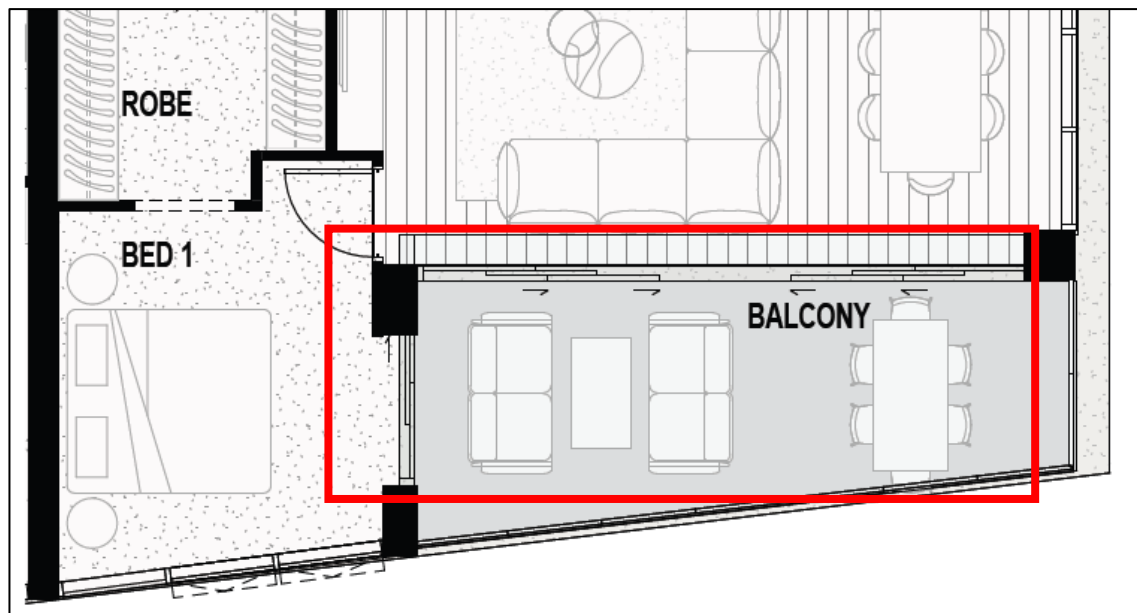


Figure 11: Sliding doors shown on balcony (Unit Type 6 shown) (MAS, 2026)

The western elevation has been further developed to incorporate a more layered façade treatment, with additional solid elements, vertical architectural interventions, balcony structures and screening incorporated to reduce the visual dominance of glazing and provide greater depth to the building envelope.

As noted above, the revised architectural design identifies vertical blades and wall extensions as elements which assist in shielding habitable rooms from the western sun. The western façade is also articulated through a combination of horizontal and vertical interventions, including slab extensions and deep balcony overhangs.

The western façade therefore does not rely solely on glazing to provide environmental amenity. Rather, the glazing is integrated with solid wall elements, balcony structures and screening to create a layered façade which provides shading, solar protection and visual depth (refer to **Figure 13**, which provides a comparison to the previous façade expression).



Figure 12: Western Elevation treatment - Previous (Left) and Revised (Right) (MAS, 2026)

The treatment is particularly responsive to the western orientation and the site's interface with the rail corridor, with the additional façade depth and screening also assisting in moderating the potential effects of afternoon sun and the immediate rail environment. Notably, the prior design amendment deliberately positioned the core on the western façade, to reduce the amount of units with a western orientation. Only two units have a western orientation (all other units have orientation in at least one other direction), with those western units utilising façade articulation to create northern exposure and orientation to balconies too.

The northern and eastern elevations incorporate projecting balcony slabs and associated façade elements which provide depth to the building envelope and contribute to the shading of glazing and habitable rooms.

The architectural design identifies the extended slab edges as horizontal shading ledges to glazing below, with façade projections providing shade to habitable rooms from high summer sun. Balconies also function as deep awnings to the level below, providing an additional layer of solar protection to the façade (refer to **Figure 14**).



Figure 13: Materiality and façade features, which shows the shading resultant of the design (MAS, 2026)

The revised design consequently incorporates shading as an integral component of the façade composition, rather than relying solely on applied shading devices. The combination of balcony slabs, slab extensions, recessed façade areas and associated screening provides a layered relationship between the internal apartment spaces and the external environment.

The dimensions and locations of the relevant projections and shading elements are demonstrated on the revised Architectural Plans at **Attachment B**.

These measures, together with the orientation of the apartment layouts and provision of external living areas, support natural ventilation, daylight access and passive solar protection. Overall, the eastern and western façades provide an appropriate subtropical design response having regard to the site's orientation and surrounding context. **Figure 15** below identifies how the development responds to the Buildings that Breathe matter with respect to natural air and ventilation.

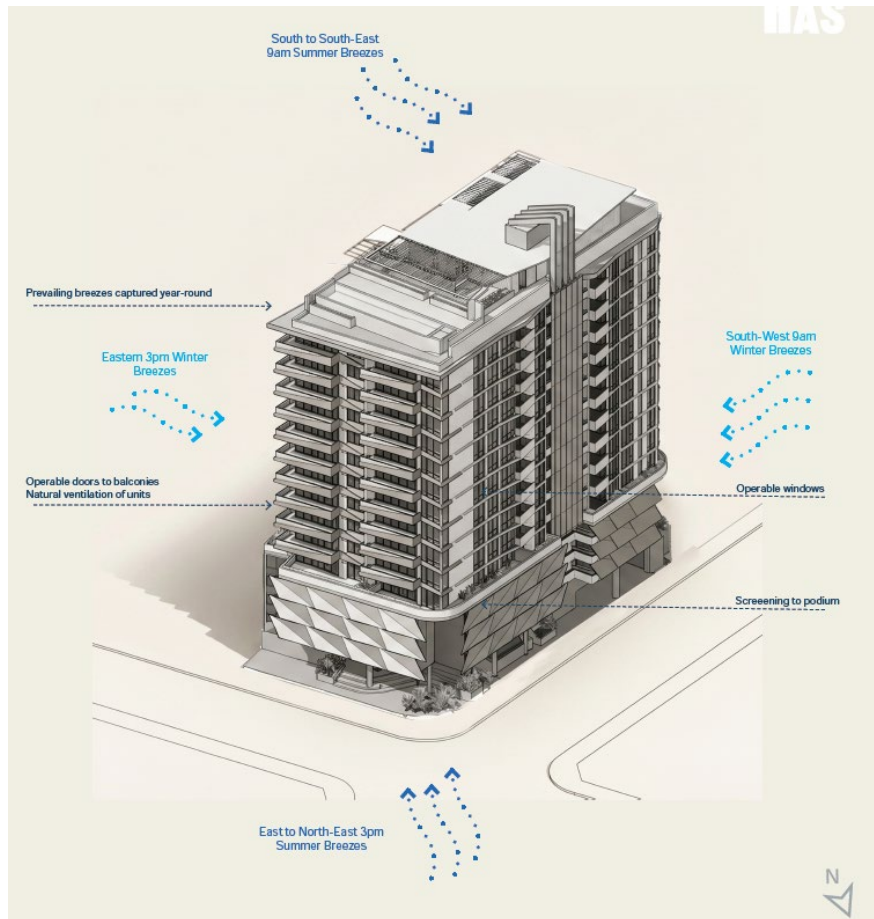


Figure 14: Buildings that Breathe – Natural Air and Ventilation Aspects (MAS, 2026)

Flood resilient design

Item 4

It is acknowledged that removable, flood-responsive bi-fold doors for the retail tenancy are now proposed. However, insufficient detail has been provided to demonstrate the suitability, operation and ongoing management of these measures in a flood event. Provide the following:

- a) *Specifications for the proposed bi-fold door system, demonstrating its suitability and performance during flood events.*
- b) *Details of the proposed flood protection measures for the retail tenancy and associated amenities, including how flood ingress will be prevented.*
- c) *An updated Flood Emergency Management Plan (FEMP) detailing the operation, deployment and maintenance of the flood protection measures, including procedures to ensure future owners and tenants are informed of their responsibilities.*
- d) *Details of any fit-out requirements or building management measures necessary to ensure flood-resilient materials and construction methods are used within flood-affected areas.*
- e) *Details of lift operation during flood events, including flood protection measures, shutdown procedures and arrangements for occupants who may be unable to use stairs.*

Note: The submitted FEMP currently provides only a high-level overview and does not contain sufficient operational detail to demonstrate the long-term management of the proposed flood resilience measures.

Item 4 Response

Please refer to the updated Flood Risk Assessment (**FRA**) and Flood Emergency Management Plan (**FEMP**) (**Attachment D**) for a detailed response.

The updated documentation in **Attachment D** provides guidance on the fit out (including materials and door types), however this is subject to detailed design and the types of tenancies that are provided at the ground floor. The FRA also addresses the proposed flood protection measures, their operation and deployment, ongoing maintenance and management requirements, flood-resilient construction and fit-out measures, and the operation of lifts during flood events. The FEMP also identifies the responsibilities of future owners, occupants and building management in implementing and maintaining the proposed flood resilience measures.

Accordingly, the matters raised by Council have been addressed and are incorporated within the updated FEMP, which provides the necessary operational framework for the ongoing management of the development's flood resilience measures.

Verge Width

Item 5

While the proposal achieves partial compliance along Sylvan Road, the reduced verge widths along Landsborough Terrace does not demonstrate an equivalent outcome. The proposed 4.47m and 4.14m verge widths do not provide a consistent Centre Street cross-section and have not adequately demonstrated capacity to accommodate future pedestrian, landscape and infrastructure requirements. Verge widths below 5m may compromise the ability to accommodate a compliant pedestrian path, street trees and essential infrastructure in accordance with the Infrastructure design planning scheme policy. Provide:

a) Amended plans demonstrating a minimum 5m verge width along all site frontages.

Item 5 Response

The proposed verge width to the southern frontage of Landsborough Terrace has been increased to 5m, through the linear verge dedication, in response to Council's Further Advice request.

The proposed 4.145m wide verge to the western frontage of Landsborough Terrace remains unchanged. We note that Council has previously accepted that verge outcome, advising that reduced verge widths are acceptable where no retail uses interface with these frontages (this was expressly stated in item 5 of the Council's Information Request).

While this dimensions is less than the 5m stated in the acceptable outcome of the Streetscape Hierarchy Overlay Code, the proposed verge widths provide sufficient space to accommodate pedestrian movement and the required streetscape and infrastructure functions having regard to the particular role and context of the western Landsborough Terrace frontage.

In this regard, the western Landsborough Terrace frontage does not accommodate retail or other active commercial uses, with the principal pedestrian movement and active public interface associated with the development occurring along Sylvan Road. Further, the southern frontage to Landsborough Terrace is not anticipated to accommodate materially greater pedestrian movement than the western frontage. The proposed verge widths therefore appropriately respond to the anticipated pedestrian demand and function of the respective frontages.

The revised Architectural Plans (refer to **Attachment B**) also demonstrate that the verge areas can accommodate the proposed pedestrian paths, landscaping and associated infrastructure without compromising the operation or accessibility of the development. Accordingly, the proposed 4.145m verge width provides an appropriate and functional streetscape outcome in the context of the site

and the differing roles of the three frontages, notwithstanding that a 5m width is not achieved along the western frontage of Landsborough Terrace.

This outcome is also consistent with PO1 of the Streetscape hierarchy overlay code², which seeks to improve pedestrian movement and amenity through verge widths appropriate to the anticipated pedestrian movement and streetscape function. The proposed verge widths provide sufficient space for pedestrian movement, landscaping and associated streetscape infrastructure, and therefore achieve the intent of PO1 having regard to the specific function and context of the Landsborough Terrace frontages.

Deep Planting

Item 6

The proposal does not adequately demonstrate compliance with PO13h, PO24h, PO25a and PO56 of the Centre or mixed use code. The proposed deep planting area remains substantially below the minimum 176m² required and is fragmented into small planting areas that are unlikely to support the establishment of mature subtropical canopy trees.

Given the scale and bulk of the proposed development, deep planting is required to provide meaningful landscape outcomes, soften the building form, improve amenity and contribute to the subtropical character sought by the City Plan. Provide:

- a) Amended landscape and architectural plans demonstrating an increase of contiguous deep planting capable of supporting mature subtropical canopy trees.*
- b) Details demonstrating that the proposed deep planting areas provide sufficient soil volume and dimensions to achieve long-term canopy growth outcomes.*
- c) Revised plans confirming that nominated deep planting areas are open to the sky and are not constrained by buildings, structures or podium elements.*

Note: Podium planters and raised landscaping do not constitute deep planting and cannot be relied upon to satisfy the deep planting outcomes of the Centre or mixed use code.

Item 6a) Response

A number of meaningful changes have been made to the development, which has facilitated an enhanced and high quality integrated landscaped and deep planting outcome.

Regarding the south western side deep planting area, the Level 5 Floor Levels and above have been amended which have created 4m x 4m dimensions which are fully open to the sky. As shown in **Figure 16** below. This has been achieved by reconfiguring the plant and equipment spaces on each level. This assists in creating a strong vertical break in the building that reinforces the ground level deep planting outcome.

² **PO1** of the Streetscape hierarchy overlay code states “Development must improve pedestrian movement and amenity by providing for verges to a width that is appropriate to accommodate large subtropical street tree planting and high levels of pedestrian movement” (Emphasis added).

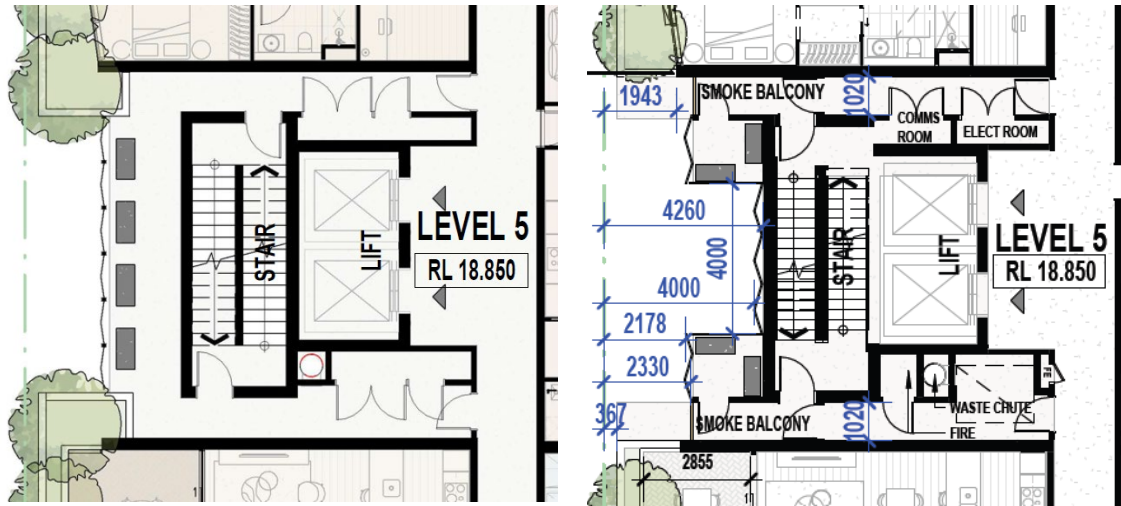


Figure 15: Revised Floor Level Outcome Above Deep Planting (South West Portion) – Proposed (Left) and Revised (Right) (MAS, 2026)

Regarding the north-west portion of deep planting, this space has been reorientated to maximise the amount of deep planting which is open to the sky and availed of light and rain, whilst also optimising the corresponding residential floor layouts. The north-east portion of deep planting also continues to maximise the elements open to the sky and availed of light and rain. These deep planting areas have also been subject of amendments to the podium facades, to remove the faced elements that projected in front of the deep planting areas; thereby reinforcing the strong presentation of these deep planting areas to the street frontages.

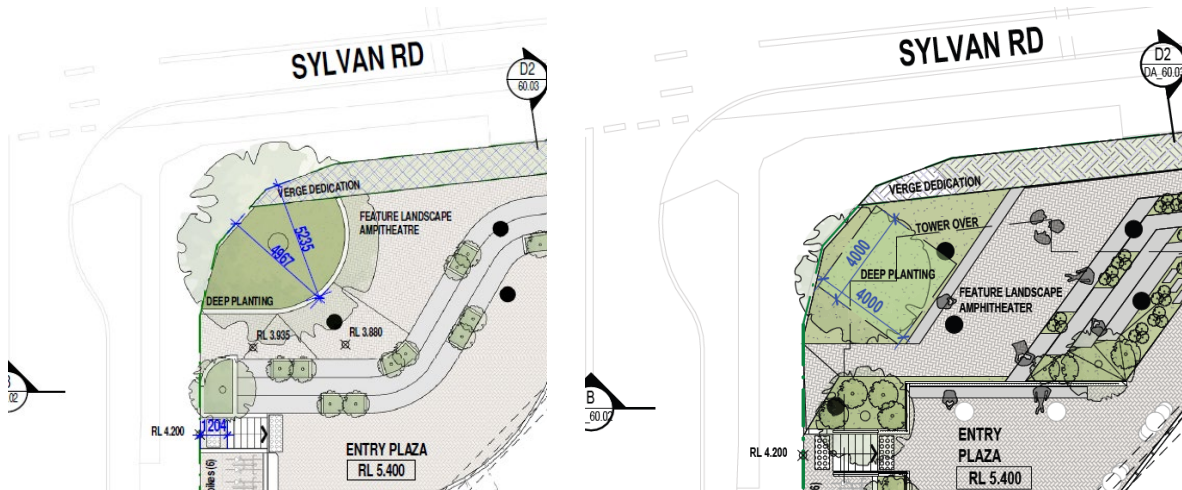


Figure 16: Revised Floor Level Outcome Above Deep Planting (North West Portion) – Proposed (Left) and Revised (Right) (MAS, 2026)

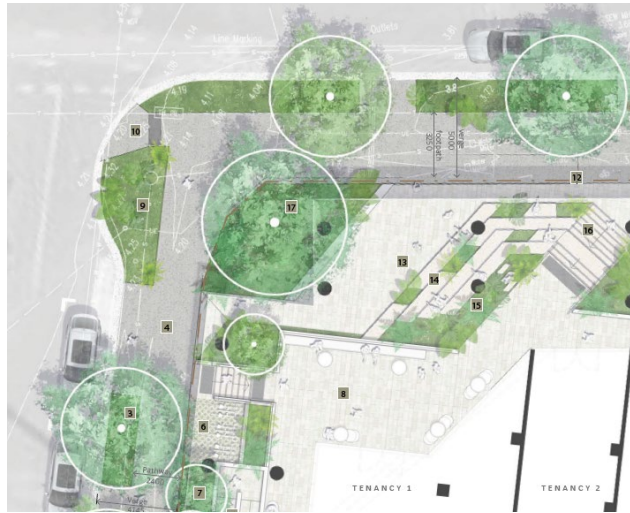


Figure 17: Revised Deep Planting Area (North West Corner) (IvyMay 2026)

It is noted that the deep planting approach adopted by the Applicant is directly responsive to the recommendations of Council in early pre-lodgement meetings, which sought that the Applicant consider amending the design (which at that time had no deep planting that was open to the sky) to provide a greater setback (with no building above) along the corner of Sylvan Road and Landsborough Terrace to facilitate a physical and perceived reduction in building bulk whilst introducing true deep planting to balance the building bulk. What has eventuated is three deep planting areas, including one at the corner as requested by Council, which contribute meaningfully to the streetscape environment and the balancing of built form. All deep planting areas have 'bang for buck' given their celebration within the streets and in respect of the corner its successful integration with public realm experiences.

Notably, the site specific circumstances must also be appreciated here, whereby the balancing flood outcomes require podium car parking, which must achieve compliance with TAPS requirements and a floorplate efficiency to allow the development to be viably progressed.

It is also particularly relevant to appreciate the strength of the ground plane design to Sylvan Road, with the quality of the public realm proposition through public terrace areas and associated landscape embellishment. This is not an insignificant design feature of the development, and provides a public benefit for the project. It is particularly notable given the need to address a range of constraints to the site, including the flood levels, road and rail interfaces, and other features. The outcome of the podium form and the ground plane must be viewed through the lens of the significant effort taken to provide a public realm and landscape outcome that is a public benefit to Sylvan Road.

In respect to Item b), The revised Landscape Concept Plan provides further detail regarding the dimensions and planting depths of the proposed landscaped areas to support long-term canopy growth outcomes. The Ground Floor Structure Diagrams identify an increase of 67m² of deep planting areas, comprising a new total of 109.18m², while the Level 5 Structure Diagram identifies 69.85m² of planting at 1,200mm depth and 70.15m² at 1,000mm depth.

The Landscape Concept Plan also identifies opportunities for large subtropical shade trees within the deep planting areas, with the building form configured to provide openings and planting areas to accommodate canopy growth.

Accordingly, the revised landscape design provides appropriately sized and configured planting areas, with substantial soil depths and open-to-sky areas to facilitate the establishment and long term growth of canopy vegetation.



Figure 19: Revised Ground Level Deep Planting (IvyMay 2026)

In respect of item c), as discussed in Item 2, amendments have been made to the podium areas over the deep planting areas. The podium floor plate has been configured to provide a minimum 4m x 4m clear opening for each deep planting area, extending to the Level 5 floor plate. Refer to the Item 2d) response for a complete discussion regarding the configuration of the podium floor plate and the extent of the openings provided above the deep planting areas.

Swept Paths and On-Street Parking

Item 7

Provide further information addressing the following:

- Updated swept path plans demonstrating through-road clearances measured to the opposite kerb line. The assessment is to specifically address potential conflicts associated with the refuse collection vehicle egressing onto the opposite side of Landsborough Terrace near the adjoining intersection.
- Confirmation of the total loss of on-street parking spaces resulting from the removal and reinstatement of existing crossovers and the construction of the proposed new crossovers.
- An assessment of the impact of the development on existing on-street parking infrastructure, including parking signs, line-marking, taxi zones, loading zones, 1P parking areas and no-standing zones. Provide an on-street parking layout plan identifying all required signage and line-marking amendments.

Item 7 Response

Please refer to the updated Traffic Impact Assessment (**Attachment E**) and updated Waste Management Report (**Attachment F**) for a detailed response to each item.

In respect of item a), updated Refuse Collection Vehicle (RCV) swept paths have been

undertaken, retaining a minimum 3.0m clearance from the edge of the kerb on the western side of Landsborough Terrace to allow sufficient width for typical opposing traffic movements. The RCV is able to be wholly located on the site. An extract of the revised swept path is provided below in **Figure 18**.

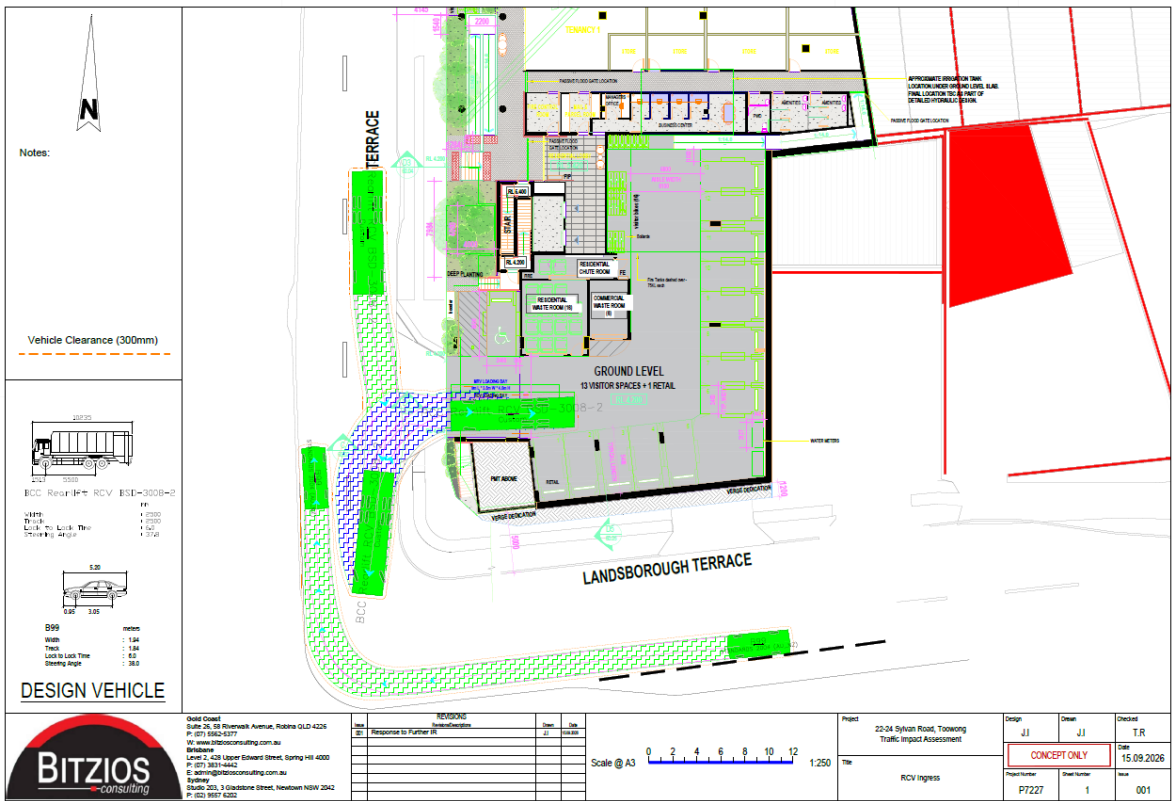


Figure 20: Revised Swept Paths (Bitzios, 2026)

In respect of item b), the proposed development results in a net reduction of one crossover on Landsborough Terrace. In addition, two of the existing crossovers will be redesigned, however the existing locations shall be retained. **Figure 21** below shows the existing and proposed on-street (kerbside) parking.

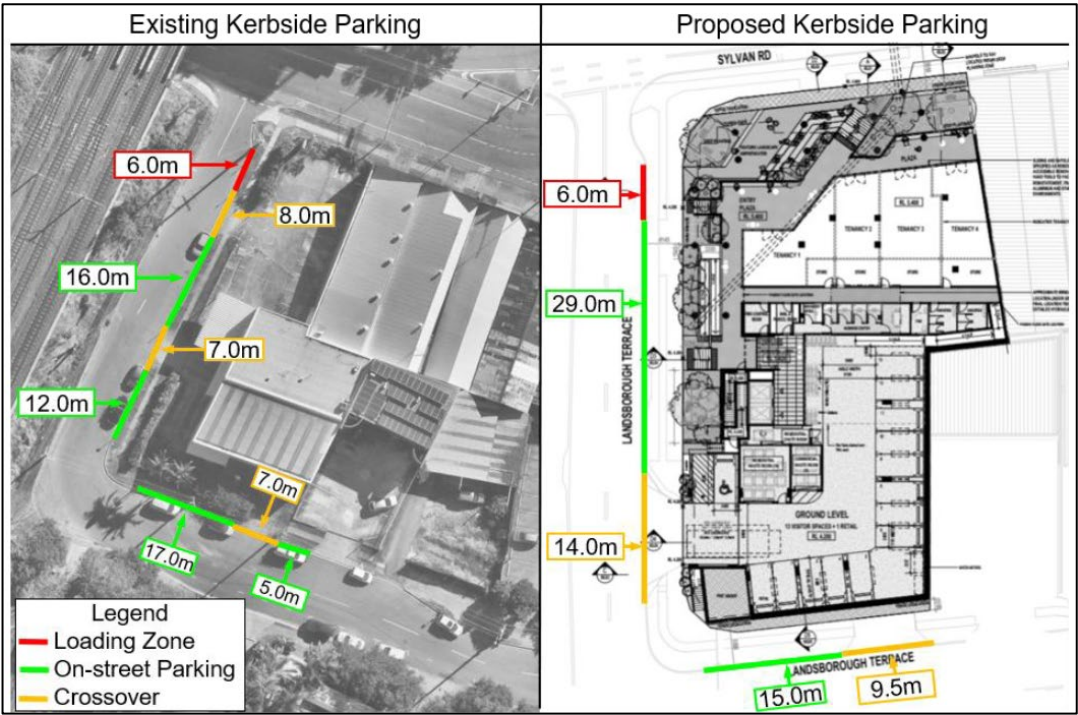


Figure 21: On-Street Car Parking – Existing and Proposed (Nearmap and MAS, with mark ups by Bitzios, 2026)

In respect of item c), an assessment of the existing on-street car parking infrastructure has been included within the updated Traffic Impact Assessment (**Attachment E**). Allocation is ultimately up to the asset custodian (being Council) and therefore remains at the discretion of Council. However, it is recommended that the 1P parking allocation be extended to cover the now removed crossover to minimise changes to on-street parking supply. No further changes are proposed to the on-street parking infrastructure. **Figure 22** below identifies the proposed signage for Landsborough Terrace.

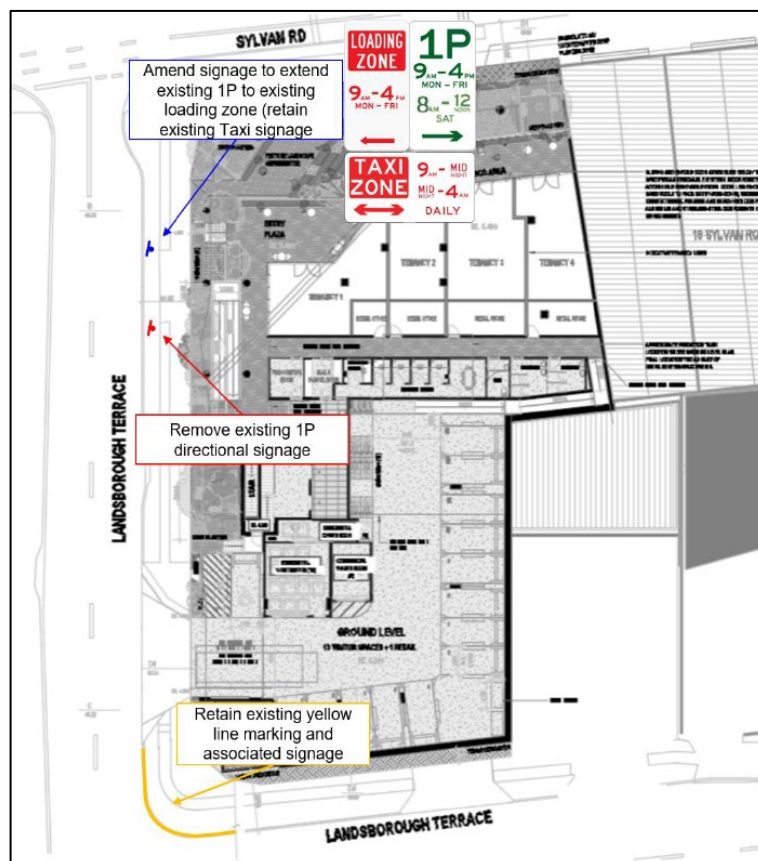


Figure 22: On -Street Car Parking Signage Plan (Bitzios 2026)

Car Parking Facilities – Pedestrian Access

Item 8

The proposed design does not demonstrate compliant pedestrian access between the ground floor parking areas and the lifts. Amend the plans to demonstrate suitable pedestrian access for:

- Transfer of retail waste, bulky waste and other large items between the retail tenancy, storage areas and foyer lifts.*
- Access between the basement and ground floor parking and bicycle parking areas and the lifts, including access for users of the PWD parking spaces.*

Item 8 Response

The Ground Floor Plan has been amended to include a new 1:14 gradient ramp within the space adjacent to car park 13. The new ramp provides an equitable pedestrian connection between

the retail tenancies, storage and refuse areas, and the Ground Level car parking. The revised arrangement facilitates the transfer of retail waste, bulky waste and other large items between these areas and the Ground Level foyer and lift access.

The revised plans also demonstrate that the bicycle parking provided throughout the parking levels is accessible via the same pedestrian route from the Ground Level, with the 1:14 gradient ramp providing the connection from the Ground Level parking area to the upper-level parking and bicycle parking areas. The bicycle parking is located in close proximity to the respective lift lobbies at each level, providing convenient and equitable access between the bicycle parking, vehicle parking and vertical circulation core. Accordingly, the revised arrangement provides appropriate and equitable pedestrian access between the parking, bicycle parking and lift facilities. **Figure 23** identifies the new 1:14 gradient equitable access ramp.

Refer to the revised Architectural Plans (**Attachment B**) for further detail.

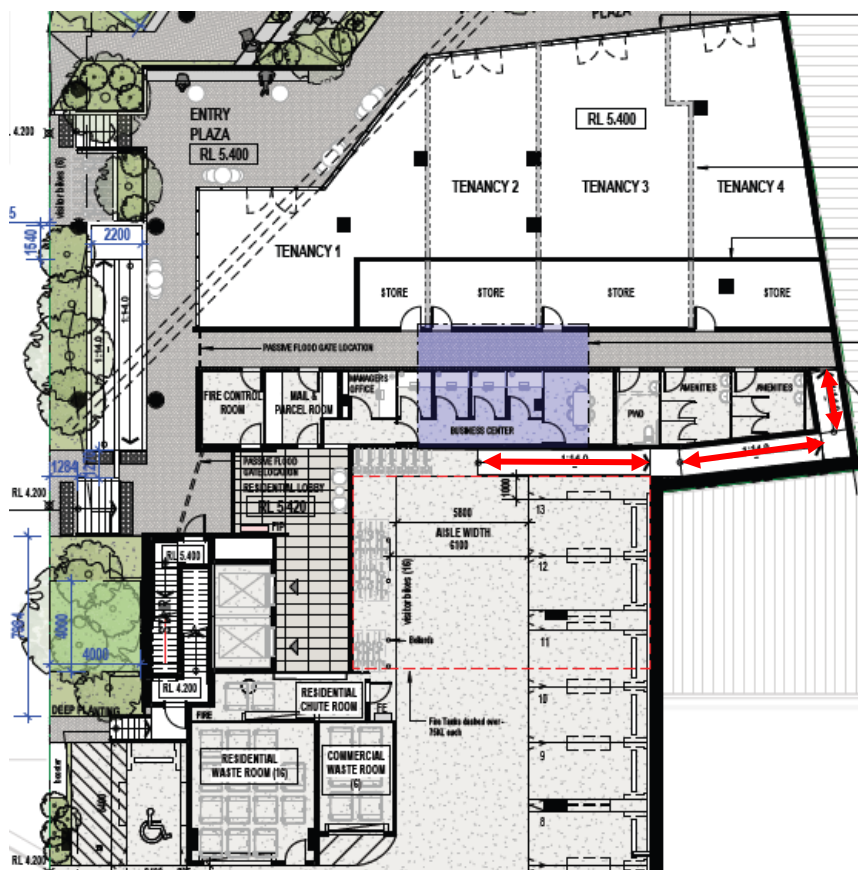


Figure 18: New Internal Access Ramp – Ground Floor (MAS 2026)

Visitor bike parking facilities

Item 9

The current visitor spaces, near the parking aisle, are all vertical whereas the AS2890.3 requires that 20% of all parking spaces must be horizontal. The bike parking facilities must be in accordance with AS2890.3:2015, i.e., to have a functional bicycle parking facility that is easily accessible and is easy to store and retrieve bicycles that does not interfere with pedestrian access and is protected from motor vehicles access. (Note: The typical bike envelope is 1800x 500 x 1200 high).

The current bike spacing plan measurements of the plan do infer that these spaces will be all vertical and will require that the horizontal alignment of handlebars to be offset by 300mm as

per figure B7 of the AS2890.3.

These facilities are also not designed to reasonably be protected from motor vehicle encroachment into bicycle parking area (clause 2.4.1 of the AS2890.3), i.e. the bike facility is measured to be 1.2m wide (the bike envelope size) which does not provide a minimum aisle width of 1.50m, which is to be measured from wall to inside face of safety protection bollards.

This would also reduce the parking aisle width from the AS2890 minimum standard of 5.8m to a maximum of 5.4m, which of course is not acceptable.

- a) *Amend the Ground floor level visitor bike parking facility, currently shown in the parking aisle, to comply with AS2890.3 Parking facilities, Part 3: Bicycle parking.*

Item 9 Response

Bicycle parking on ground level has been revised to ensure that minimum 20% of the supply have been provided as horizontal bicycle parking spaces, compliant with AS2890.3.

Horizontal bicycle parking has been provided as 0.5m wide x 1.8m long with 1.5m access aisle. The revised arrangement ensures bicycle parking users are accommodated outside of the vehicle manoeuvring aisle and are protected from motor vehicle encroachment. The design amendments also ensure that the required vehicular aisle width is maintained, with the parking aisle remaining compliant at 5.8 m width. The amended bicycle parking layout therefore addresses the matters raised by Council and complies with the relevant requirements of AS2890.3:2015.

The revised bicycle parking arrangement also provides an appropriately accessible and functional facility for visitors, without creating an encroachment into the vehicle manoeuvring area.

Refer to the revised Architectural Plans (**Attachment B**) and the updated Traffic Impact Assessment (**Attachment E**) for a detailed response.

Residents Bike Park facilities

Item 10

The six bike (vertical) parking spaces, adjacent to car spaces, 2.35; 3.39; 4.39, do not maintain the required minimum 1.50m aisle width and should be relocated.

- a) *Amend the plans to demonstrate compliance.*

Item 10 Response

The six bicycle parking spaces identified above have been relocation to locations which are provided with appropriate access, in accordance with AS2890.3 *Parking facilities, Part 3: Bicycle parking*. **Figure 24** to **Figure 27** below shows the revised outcome associated with the bicycle parking throughout the development.

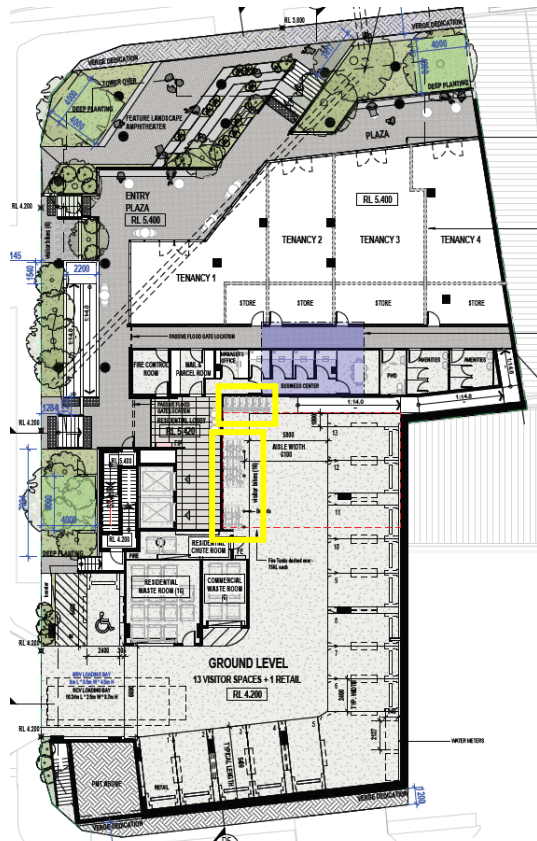


Figure 19: Ground level bicycle parking outlined in yellow (16 visitor spaces)

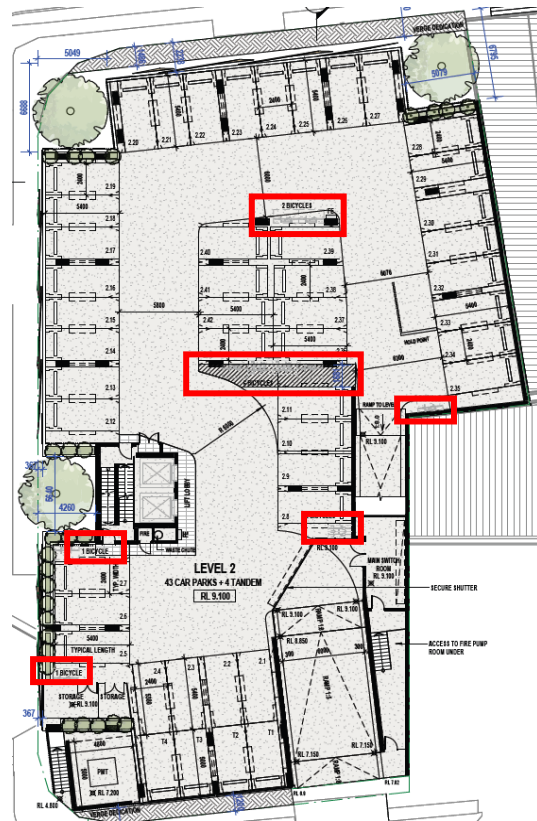


Figure 20: Level 2 bicycle parking highlighted in red (13 spaces)

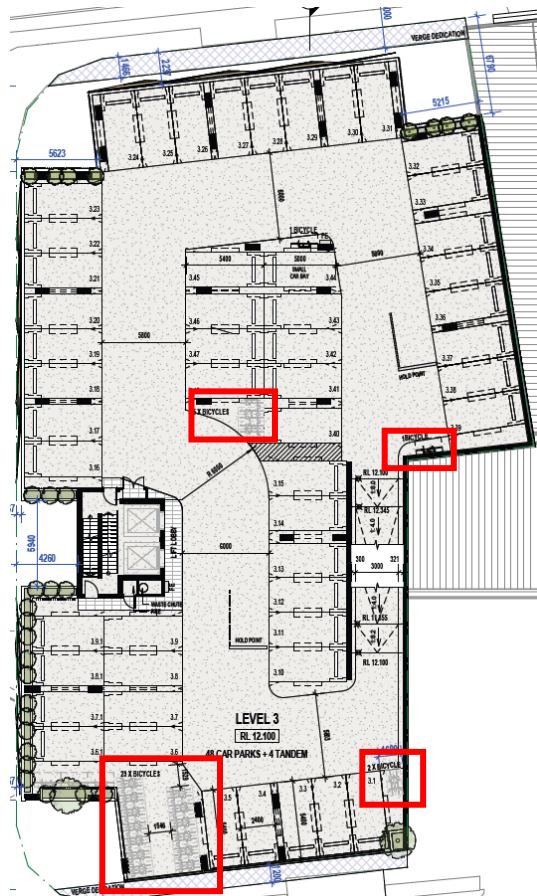


Figure 21: Level 3 bicycle parking highlighted in red (38 spaces)

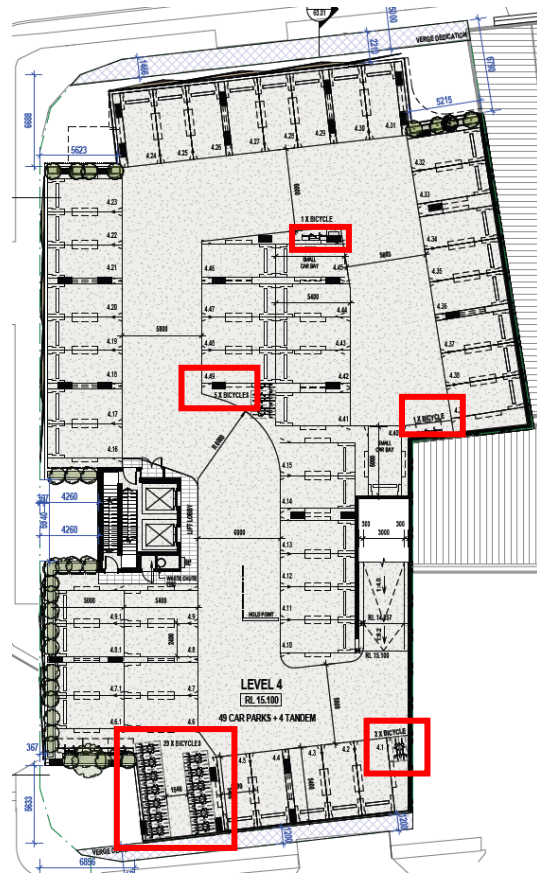


Figure 22: Level 4 bicycle parking highlighted in red (38 spaces)

Waste Management

Item 11

The Waste Management Plan does not adequately demonstrate:

- a) *The transfer, storage and collection of bulky waste items, including a compliant access route between tenancy floors, lifts and waste storage areas. There is also no transfer route / ramp for the commercial waste to storage areas - only via stairs.*
- b) *The management, storage and disposal of problem wastes, including e-waste, batteries, cardboard, polystyrene, printer cartridges and unwanted clothing.*
- c) *Amend the Waste Management Plan and architectural drawings accordingly.*

Item 11a) – 11c) Response

For a detailed response, please refer to the updated Waste Management Plan (**Attachment F**) and the revised Architectural Plans (**Attachment B**).

A ramp has been provided between the tenancies and the waste storage areas on ground level (refer to **Figure 28**). This new ramp will allow convenient access from the retail tenancies to the waste storage areas.

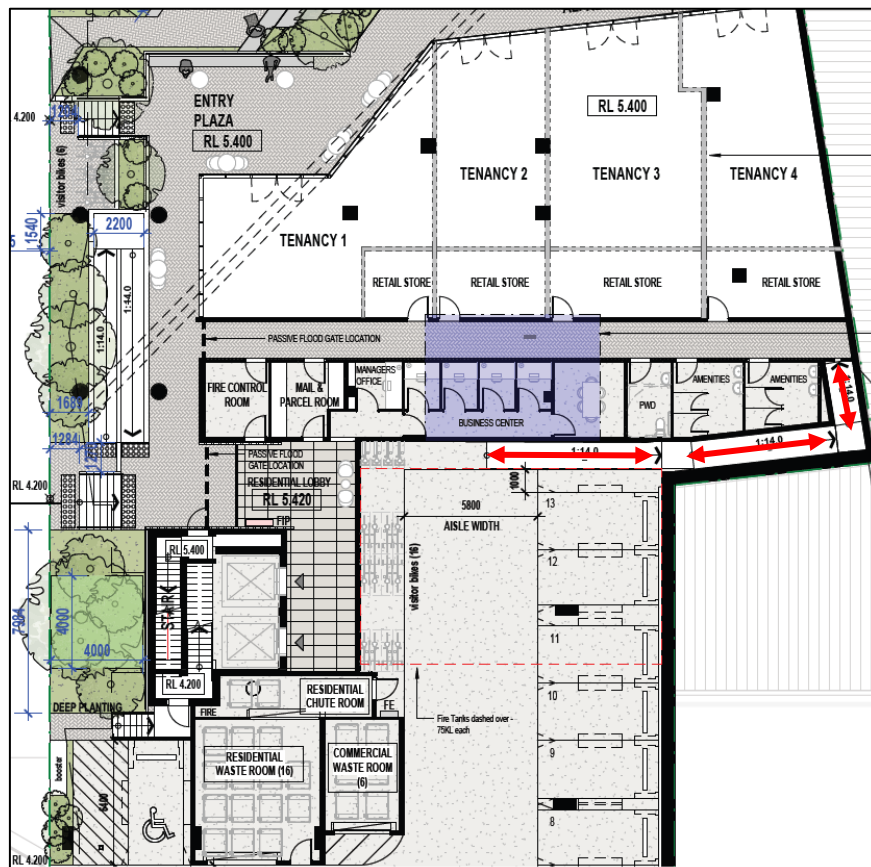


Figure 23: New ramp on ground floor highlighted in red (MAS, 2026)

The provision of storage space for hard/problem waste and charity goods is considered a best practice measure and is not a mandatory requirement under Council's Waste Policy, therefore has not been provided for within this development. Residents will however have access to Council's Resource Recovery Centres (or kerbside collection throughout the year) to dispose of these items.

Fire Control Room

Item 12

The plans do not demonstrate that the Fire Control Room (FCR) or Fire Control Centre (FCC) is located above the applicable flood immunity level. In accordance with the Flood overlay code, essential electrical services, including fire control facilities, are required to be located above the 1% AEP flood level plus 500mm freeboard.

a) *Amend the plans accordingly.*

Item 12 Response

Whilst the Fire Control Room (FCR) has been retained on the Ground Floor Plan at 5.4m AHD, three passive flood barriers are proposed to provide a minimum flood immunity level of 7.2m AHD to the FCR.

The FRA (refer to **Attachment D**) confirms that this complies with the Flood Overlay Code.

Flood Risk Assessment and Emergency Management

Item 13

It is acknowledged that Allan & Dennis' information response dated 28 May 2026 includes a Flood Emergency Management Plan. Given the substantial redesign of the proposal, the Flood Risk Assessment dated 14 November 2025 is to be updated to reflect the revised development. The consolidated Flood Risk Assessment is to:

- a) *Incorporate the revised architectural design.*
- b) *Document all passive and active flood mitigation measures.*
- c) *Demonstrate the development's flood resilience measures.*
- d) *Incorporate the Flood Emergency Management Plan framework and relevant information response material.*
- e) *Reassess residual Brisbane River flood risks having regard to the revised building form.*
- f) *Demonstrate compliance with the Flood overlay code.*

Item 13 Response

For a detailed response refer to the revised FRA (**Attachment D**), which states:

- a) The FRA and FEMP have been updated to reflect the amended building plans;
- b) The FEMP have been updated to include flood mitigation measures (refer to section 3.3 of the FEMP);
- c) The FRA has been updated to demonstrate the development's proposed flood resilience measures (refer to section 4 of the FRA);
- d) The FEMP is included as an appendix to the FRA (refer to Appendix C of the FRA);
- e) As noted above, both the FRA and FEMP have been updated to reflect the amended building plans; and

f) A revised response to the Flood Overlay Code is included in Appendix B of the FRA. The FRA and FEMP together demonstrate that compliance to the FOC can be achieved.

The FRA (inclusive of the FEMP) concludes:

“This FRA has been prepared to support the DA and ensure compliance with the current Flood Overlay Code requirements. Relevant FOC responses are attached. If the proposed mitigation and control measures are implemented effectively, the flood risks associated with the proposed use are compatible with the hazard. A FEMP (attached) has been prepared to identify the flood risk, minimise site disruption, damage and recovery over a flood event”.

Fuel Burning Equipment

Item 14

The submitted information does not adequately identify the proposed fuel-burning equipment, including the rooftop standby generator and the two fire booster pumps located on the mezzanine level. Provide the following:

- a) The maximum fuel-burning capacity of the standby generator and each fire booster pump, expressed in megawatts (MW). The currently provided consumption rate of 0.240 g/kWhr cannot be readily converted to MW.*
- b) Details of the fuel source for the standby generator, including fuel type, storage quantity and storage location.*
- c) The location of all vents associated with the standby generator and fire booster pumps.*

Note: Should the cumulative fuel-burning capacity of all plant and equipment exceed 0.1 MW, an additional land use classification (i.e. High Impact Industry) may be required under Table SC1.1.3.A. In this circumstance, the use may not be considered minor or ancillary and will require assessment against the industry code, including matters relating to noise, air emissions and dangerous goods.

Item 14 Response

The proposed fuel-burning equipment comprises a standby generator associated with the emergency operation and life safety systems of the development.

The generator will power one lift, the three cold water pumps, one general purpose outlet for each unit (i.e. powering the refrigerator, phone charging, cooking and the like). The standby generator has a maximum rated capacity of 64kW (0.064MW). The generator is proposed to be fuelled by reticulated natural gas and is directly connected to the existing street gas supply. As such, there are no tanks required to store gas or other fuels on the site.

The two (2) fire booster pumps are ancillary fire safety infrastructure required to service the development. The fire booster pumps are emergency fire-fighting infrastructure and do not operate as power generation equipment. On this basis, the cumulative fuel-burning capacity relevant to the development is below the 0.1MW threshold identified by Council.

The proposed generator and fire booster pumps are ancillary infrastructure required to support the safe and functional operation of the development and are not intended to operate as an independent power generation or industrial facility. The equipment is intended to operate only when required for emergency purposes and routine testing and maintenance.

The generator will need to operate only when the site is isolated. This is anticipated to occur where the Brisbane City gauge is flooded above 2.92m, 3.23m and 3.53m AHD. These flood levels are estimated to be at least a 2% AEP, which is a flood event that has a 2% chance of occurring in any

given year. As such, the generator is anticipated to be used in rare circumstances (approx. 1 in 50 year flood).

Accordingly, the proposed fuel-burning equipment remains ancillary to the proposed development and does not give rise to a separate High Impact Industry land use.