

10 July 2026

Brisbane City Council
GPO Box 1434
Brisbane Qld 4001

Via email: dsplanningsupport@brisbane.qld.gov.au

Attn: Jack Woolston

Dear Synthia,

RE: Response to Information Request for material change of use involving Multiple dwellings (7 units) upon land at 112-112A Racecourse Road, Ascot 4007 (Lots 19-20 on RP33675) - A007001997

We write in relation to the development application over the abovementioned site (Council ref: A007001997) and provide the following response to Council's information request correspondence, dated 15 May 2026, under section 13.2 of the *Development Assessment Rules*.

Under section 13.2, the applicant may respond by giving the assessing authority that made the information request, within the period stated under section 13.1—

- (a) all of the information requested; or
- (b) part of the information requested; or
- (c) a notice that none of the information will be provided.

In this instance, we provide a full response to all of the information requested as per subsection (a).

Site frontage, access and servicing

1. *The site frontage is constrained by the location of a street tree, a bus zone, and electrical infrastructure. Furthermore, the yield of the development necessitates a kerbside refuse presentation solution. To ensure the development provides safe access for all vehicles, allows for the retention of existing infrastructure and street trees and provides a compliant refuse solution, the following amendments and further information are required:*
 - a. *The driveway crossover is to be relocated to the north to achieve a minimum 2m of separation (including splays) to the street tree.*
 - b. *Provide a Traffic Impact Assessment (endorsed by a Registered Professional Engineer of Queensland (RPEQ)) to demonstrate the site access design standards comply with SC6.31 of the Transport, access, parking and servicing (TAPS) planning scheme policy (PSP).*
 - c. *Provide detailed designs for signs and line marking related to the proposed bus zone and on-street parking on Racecourse Road, prepared and endorsed by an RPEQ.*
 - d. *Provide amended plans demonstrating sufficient kerbside presentation area for seven x 240L bins for refuse and five x 360L bins for recycling (10.8m length along the kerb). Bins*

are required to be offset 2m from the trunk of the street tree, setback a minimum of 1m from the power pole and not interfere with road/street signage.

- e. The proposed occasional servicing via the road reserve (within the bus zone) is not supported. Occasional servicing as per Table 1 of TAPS PSP requires a large rigid vehicle (LRV) vehicle and all servicing within the site. Consideration may be given to a smaller vehicle; however, servicing is still required to occur within the site. Provide a traffic report prepared by suitably qualified RPEQ demonstrating the above.

- a. The driveway crossover has been relocated further north to provide a minimum 2m separation between the crossover splays and the existing street tree. This arrangement retains the existing street tree whilst also accommodating the significant frontage constraints associated with the existing bus zone, electrical infrastructure and kerbside refuse presentation requirements.

The revised crossover location has been developed in consultation with the project traffic engineers and landscape architects to balance all competing frontage constraints whilst maintaining safe and efficient vehicle access.

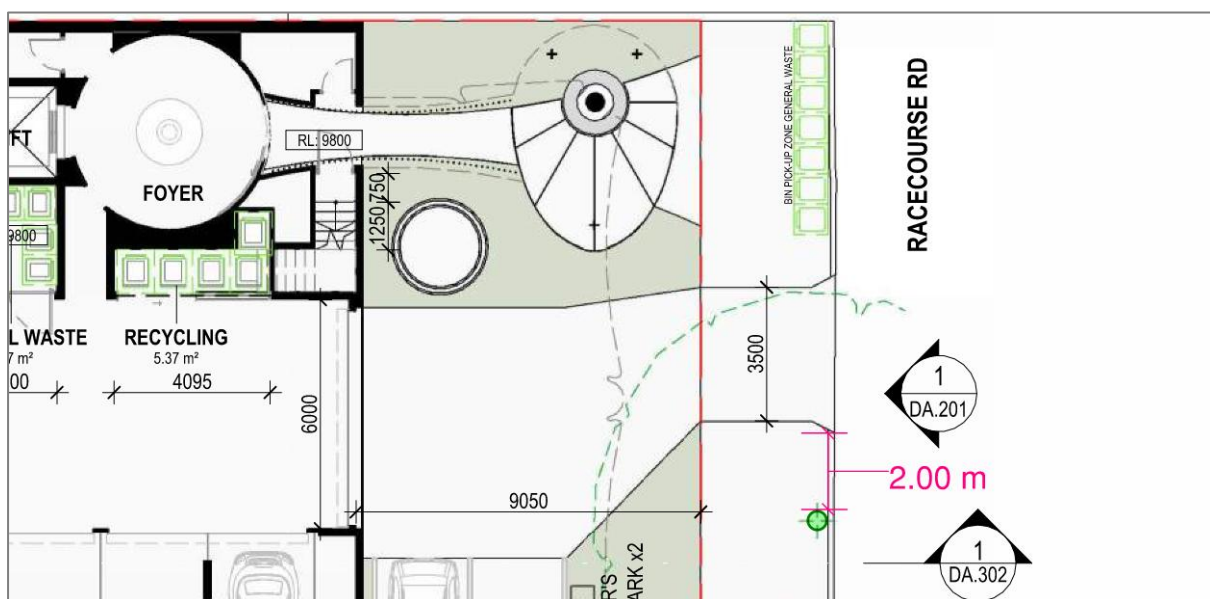


Figure 1 – Revised ground level plan showing 2.0m separation to street tree from splay

- b. A Traffic and Waste Response has been prepared by Colliers International Engineering & Design and endorsed by Simon Crank (RPEQ 18360). The report demonstrates that the revised access arrangement complies with the intent of SC6.31 of the Transport, access, parking and servicing planning scheme policy.

The report confirms that:

- the relocated crossover achieves the required separation from the existing street tree;
- the proposed 3.5m wide crossover provides safe vehicle access whilst minimising encroachment into the adjacent bus zone;
- vehicle passing is provided internally within the site between the property boundary and the basement security shutter;

- the development generates a very low traffic volume, resulting in only rare opposing vehicle movements; and
- any opposing vehicle movements would be resolved within a matter of seconds without affecting the operation of Racecourse Road.

The report concludes that the proposed access arrangement represents the optimal engineering solution having regard to the site's physical constraints and achieves SC6.31 of the Transport, access, parking and servicing planning scheme policy.

- c. The drawings identify the proposed crossover location, kerbside arrangements, bus zone interface, vehicle movements and the removal of the existing on-street parking space. The proposed arrangements have been endorsed by an RPEQ and demonstrate that the frontage can safely accommodate the proposed development whilst maintaining the functionality of the bus zone and surrounding road network.
- d. The architectural plans have been amended to provide the requested kerbside refuse presentation area.

The revised plans demonstrate sufficient verge length to accommodate seven (7) 240L general refuse bins and five (5) 360L recycling bins whilst maintaining:

- a minimum 2m offset from the existing street tree;
- a minimum 1m clearance from the existing power pole;
- separation from road signage; and
- clear pedestrian movement along the footpath.

The revised arrangement has been reviewed by Colliers International Engineering & Design and is illustrated within the accompanying kerbside allocation plan.

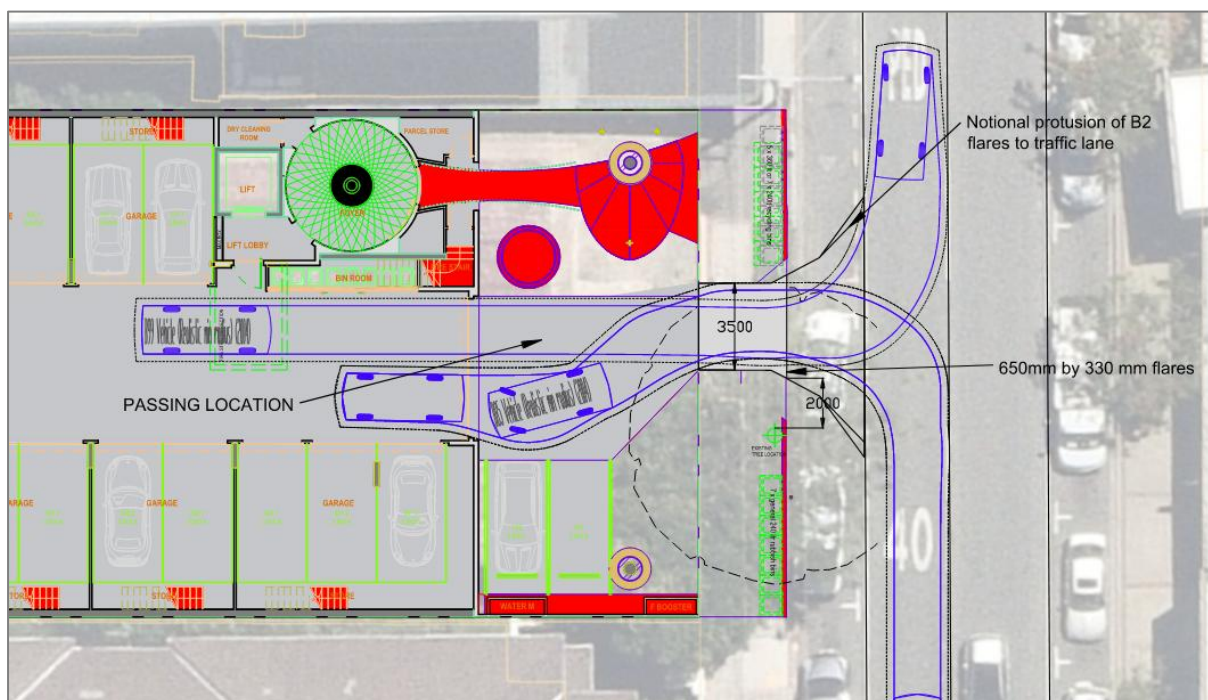


Figure 2 – Kerbside allocation and vehicle access

- e. This matter has been comprehensively addressed within the Traffic and Waste Response prepared by Colliers International Engineering & Design.

The report concludes that the proposed frontage arrangement represents the safest and most practical solution when balancing the competing constraints presented by the existing street tree, bus zone, property frontage and required site access.

The report notes that relocating the crossover outside the bus zone substantially reduces the operational impacts on bus movements compared with retaining vehicle access within the bus zone. While kerbside collection of recycling bins may occur within the first portion of the bus zone on alternating collection weeks, this activity is infrequent, short in duration and occurs outside the passenger standing area. The engineering assessment concludes that this presents a significantly lesser impact than requiring refuse collection vehicles to enter the site or reverse adjacent to the bus stop.

Furthermore, accommodating on-site servicing by a large rigid vehicle would necessitate substantial pruning or removal of the existing street tree together with a significantly wider crossover, outcomes that would conflict with Council's streetscape objectives.

Accordingly, the attached RPEQ traffic assessment concludes that the revised access and servicing arrangement achieves the safest and most balanced outcome having regard to all frontage constraints and satisfies the intent of the TAPS Planning Scheme Policy.

Building Height

2. *Clarify whether the rooftop terrace constitutes an additional storey under the Brisbane City Plan 2014. In particular, provide an assessment against the definition of a rooftop garden and clearly identify all rooftop elements on the architectural plans.*

The architectural plans have been amended to clearly identify all rooftop elements and include a dedicated rooftop terrace plan.

As detailed within the accompanying Planning Report, the rooftop terrace does not constitute an additional storey under Schedule 1 of the Brisbane City Plan 2014.

The only enclosed roofed elements comprise the lift overrun, stairwell and associated bathroom facilities. The roof extending beyond these elements is provided solely for weatherproofing and waterproofing these building services and circulation elements and does not create an additional enclosed floor level capable of separate occupation.

The planning assessment includes a detailed review of the definition of a storey and references the Queensland Court of Appeal decision in *Robertson v Brisbane City Council & Ors* [2022] QCA 45, confirming that roofed areas associated with lift shafts, stairwells and sanitary facilities do not constitute an additional storey where they form part of the building services and circulation elements.

The rooftop area comprises open communal and private open space only and is appropriately characterised as a rooftop terrace. Accordingly, the proposal remains a five-storey multiple dwelling, with the rooftop terrace not constituting an additional storey under the planning scheme.

Figure 3 below shows the revised rooftop terrace with all roofed areas excluded from the definition of 'storey' under the planning scheme.

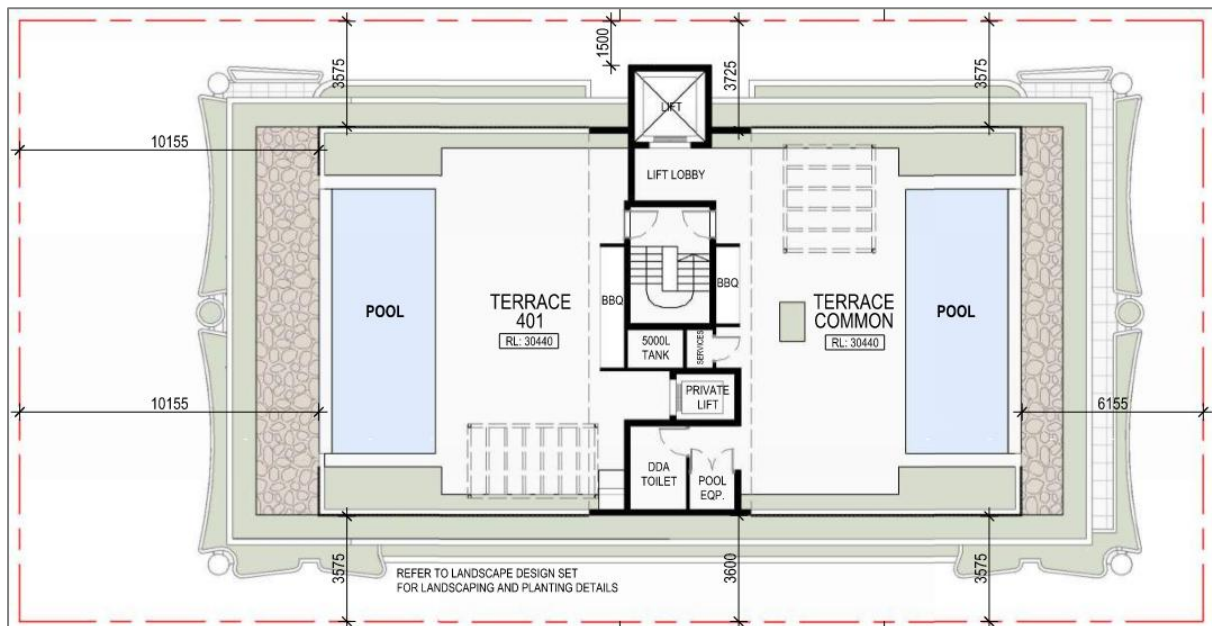


Figure 3 – Rooftop terrace demonstrating no areas constitute a 'storey' by definition

Driveway Crossover

3. *Provide amended refuse storage arrangements demonstrating sufficient storage area, resident access, compliant circulation and appropriate separation between general refuse and recycling bins.*

The refuse storage area has been comprehensively redesigned.

The revised plans demonstrate:

- adequate storage for four (4) 360L general refuse bins;
- four (4) 360L recycling bins;
- compliant circulation space around all bins;
- unobstructed resident access;
- sufficient clearance beneath the stair;
- convenient transfer of bins to the kerbside collection area; and
- separation between refuse and recycling storage.

The accompanying Traffic and Waste Response confirms the proposed storage volume is sufficient to service seven luxury apartments.

Based on Council's typical residential waste generation rates, the proposed storage capacity significantly exceeds the anticipated weekly waste volumes generated by the development.

The revised arrangement provides a practical and efficient refuse management solution that satisfies Council's operational requirements.

Figure 4 below shows the revised bin storage area adjacent to the entry lobby.

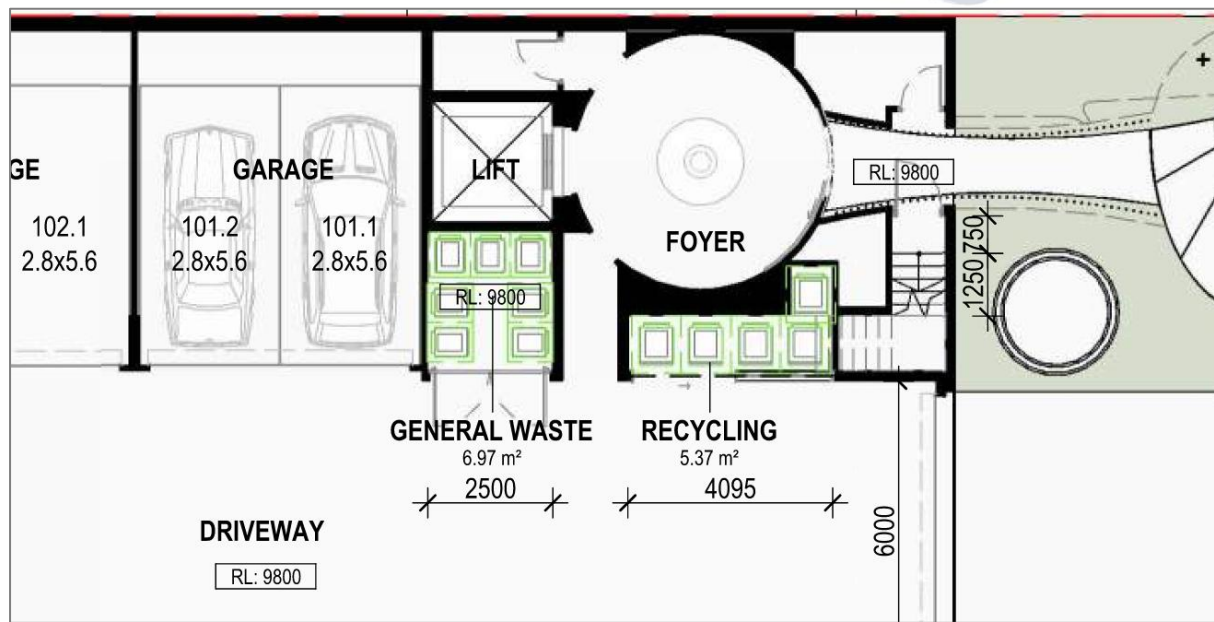


Figure 4 – revised bin storage area on ground level

Earthworks, Stormwater and Services

4. Provide engineering documentation demonstrating compliance with the Filling and Excavation Code, Stormwater Code and Infrastructure Design Code, including revised civil engineering plans, earthworks information, stormwater management and service coordination.

The requested engineering documentation has been prepared by Naxos Engineers. The submitted package includes:

- Civil Engineering Report;
- Site Based Stormwater Management Plan;
- Concept Earthworks Plan;
- Stormwater Drainage Design;
- Engineering Services Plan.

The engineering documentation demonstrates:

- appropriate earthworks across the site;
- retaining wall design;
- lawful stormwater discharge;
- on-site detention where required;
- finished surface levels;
- protection of existing infrastructure;
- coordination of underground services;
- compliance with the Filling and Excavation Code;
- compliance with the Stormwater Code; and
- compliance with the Infrastructure Design Code.

The proposal has been designed to minimise earthworks whilst providing an efficient development outcome that integrates with the surrounding road network and existing infrastructure. Refer to the attached engineering documentation prepared by Naxos Engineers.

Deep Planting

5. Provide additional deep planting and landscaping, including increased planting within the frontage and additional screening to adjoining residential properties.

The proposed deep planting arrangement has been carefully considered having regard to the site's location within the Neighbourhood centre zone. Unlike residentially zoned land, development within this zone has traditionally been characterised by buildings constructed to, or close to, the front boundary to support an active streetscape outcome. Accordingly, the proposal strikes an appropriate balance between built form, landscaping and pedestrian amenity, rather than maximising deep planting throughout the site.

Whilst the extent of deep planting has not been increased, the landscape design has been refined to further enhance the development's landscape outcome. Significant deep planting is provided along the rear boundary, creating sufficient soil volume to accommodate large subtropical shade trees that will establish a substantial landscaped buffer to the adjoining Character residential zone over time.

In addition, the proposal incorporates extensive integrated landscaping throughout the building, including generous planter boxes to balconies on every level and substantial rooftop planting. These landscaped elements soften the building's appearance, contribute to the subtropical character of Racecourse Road and provide meaningful visual greening that offsets the reduced opportunity for conventional deep planting within a centre-zoned site.

The landscape design has also been amended to increase the planting along the rear of Apartment 102, providing enhanced privacy screening between residents and the adjoining dwelling to the west.

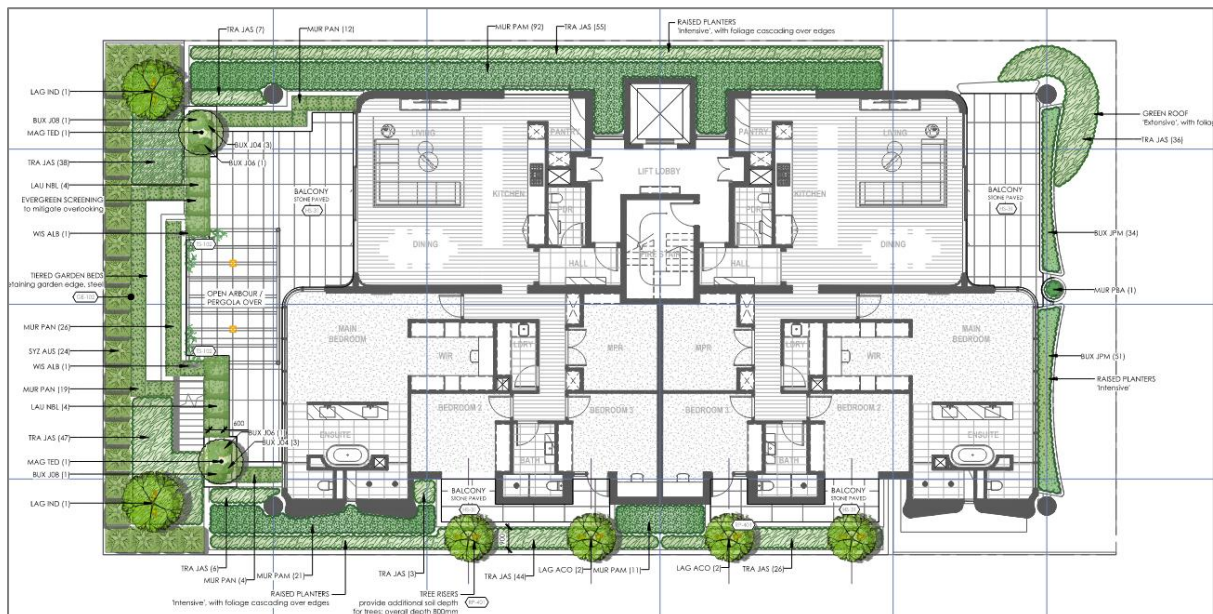


Figure 5 – Revised landscaping plan showing Level 1

Overall, the revised Landscape Concept Plans prepared by Paul Bangay Studio provide a high-quality landscape outcome that is appropriate to the site's centre zoning, complements the architectural design by 111.Arch, and achieves the intent of the Landscape Code.

Earthworks, Stormwater and Services

6. *Provide engineering documentation demonstrating compliance with the Filling and Excavation Code, Stormwater Code and Infrastructure Design Code, including revised civil engineering plans, earthworks information, stormwater management and service coordination.*

The Landscape Concept Plans have been amended to identify the indicative location of the irrigation storage tank together with associated roofwater collection infrastructure and maintenance access areas. The tank is located adjacent to the stairway on the rooftop terrace level.

Following discussions with specialist landscape architects, it is noted that detailed irrigation calculations are typically undertaken during the detailed design phase following development approval by a suitably qualified irrigation designer.

Accordingly, the Landscape Concept Plans identify an indicative 5,000L–10,000L irrigation tank servicing the containerised planting throughout the development together with the following notation: *"Irrigation tank to service containerised planting. Final size to be determined during detailed design."*

This approach is consistent with normal industry practice and provides sufficient flexibility to allow the irrigation system to be appropriately sized following confirmation of final planting species, growing media, irrigation demand and available roofwater harvesting.

The proposal therefore appropriately addresses Council's request whilst recognising that detailed irrigation design forms part of the subsequent construction documentation.

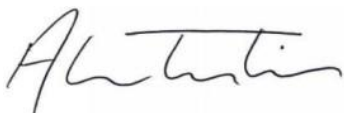
We have now provided a full response to Council's information request correspondence, and the application will proceed to public notification for a period of 15 business days in accordance with Section 53 of the *Planning Act 2016*.

In addition to this response, we provide the following documents:

- **Revised Architectural Plans** prepared by 111.Arch;
- **Traffic and Waste Response** prepared by Colliers International Engineering & Design;
- **Civil Engineering Report** and **Site Based Stormwater Management Plan** prepared by Naxos Engineers;
- **Revised Landscape Concept Plans** prepared by Paul Bangay Studio.

Should you have any questions, please contact our office on the details below.

Regards



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