

30 March 2026

Chief Executive Officer
Brisbane City Council
Development Services - Planning Services North
GPO Box 1434
BRISBANE QLD 4001

Via Email: DSPlanningSupport@brisbane.qld.gov.au

Council Reference: A006721031
Attention: Shirley Mills

Dear Shirley,

RE: Response to Information Request – Multiple Dwelling & Food and Drink Outlet at 299 Coronation Drive, Milton

We write on behalf of our client, Silverstone Developments No 18 Pty Ltd, in response to the Council's 26 February 2026 Information Request regarding development at 299 Coronation Drive, Milton.

This letter and attachments are a formal response to the Council's Information Request. Pursuant to Part 3 Section 13.2 (a) of the Development Assessment Rules, the applicant elects to provide all of the information requested. In accordance with the requirement of the Planning Act, public notification will now commence.

To the extent changes made to the proposal plans are not in direct response to the Council's Information Request, these changes are considered to amount to no more than a Minor Change to a development application as outlined in Schedule 2 of the *Planning Act 2016*. In particular:

- The changes do not result in substantially different development;
- The revised proposal continues to require code assessment;
- No prohibited development is proposed; and
- The revised application would not require referral to extra referral agencies.

This written response is accompanied by:

- Amended Architectural Plans and Response prepared by Plus Studio (Attachment A);
- Amended Landscape Concept Plans prepared by Dunn and Moran Landscape Architects (Attachment B);
- Traffic Engineering Response Letter and Swept Path Drawing prepared by Colliers (Attachments C and D);
- Waste Management Response letter prepared by Colliers (Attachment E);
- Office Market Analysis prepared by CBRE (Attachment F); and
- Acoustic Report prepared by Acoustic Works (Attachment G).

This letter sets out the applicant's response to each item. The numbering corresponds to the numbering in Council's 26 February 2026 request.

Office Needs Analysis

1. It is acknowledged that the suburb of Milton has experienced substantial transformation, including increases in density and development intensity. However, the neighbourhood plan for this locality has not been updated to reflect these changes. Notwithstanding this, the Milton neighbourhood plan code identifies that residential development is not consistent with the intended outcomes for land within the Office precinct.

While the Town Planning Report submitted with the application presents justification for the proposed residential use, it does not provide adequate analysis or justification for the consequential loss of Office-zoned land that would arise from the proposal.

- a) To support a more robust and evidence-based planning assessment, please provide an analysis of the Brisbane CBD and Milton/Fringe office markets to better understand the potential impacts of removing land designated for Office use.*

Response

In recent times office demand across the city has changed significantly. Whilst the proposed development is noted to have been presented due to significant housing demands, we also note that the previous approval has not been enacted due to the rapidly changing and diminishing commercial office market. The applicant's decision to change strategy toward a residential outcome has not been taken lightly, given the time and cost involved in securing the commercial office building approval over the site. This decision has been made following input from various professionals.

To assist the Council in understanding the rationale behind not delivering a commercial office outcome for the site, and in response to Council's Information Request, the accompanying commercial office market analysis has been prepared by CBRE.

Key takeaways from this advice are as follows:

- It is expected that office vacancy will remain elevated for some time. The Milton precinct currently carries the highest vacancy rate within the Fringe, and several upcoming tenant movements will add further pressure. A number of larger occupiers, including Downer, are assessing relocation options, and ConocoPhillips has committed to a CBD tenancy, which will leave approximately 4,000 square metres becoming available on Park Road. Historically, Milton has taken time to reabsorb larger backfills, and this new space is likely to prolong current vacancy levels.
- The broader office market has shifted materially over the past few years, and the demand uplift that many anticipated for precincts like Milton has largely not materialised. While the Brisbane Fringe overall has seen vacancy improve, falling from a peak of around 15.1% in 2022 to approximately 12% by mid-2024, Milton has remained a persistent outlier, carrying a vacancy rate of around 19% as at early 2024, by far the highest of any Fringe precinct. The flight-to-quality trend that has driven leasing activity across Brisbane has disproportionately benefited newer, well-amenitised assets in precincts such as Fortitude Valley, Newstead, and South Brisbane. Larger tenants reassessing their requirements have consistently gravitated toward premium and A-grade accommodation in either the CBD or these higher-amenity Fringe locations, rather than Milton's predominantly older stock base. This structural shift in tenant preference, rather than a temporary demand dip, is central to understanding Milton's continued underperformance relative to the broader Fringe market recovery. Refer to Figure 1 below.
- Further vacancy risk will come from project-related tenants rolling off. It is expected that the Cross River Rail project team will vacate from 339 Coronation Dr over the next few years upon completion of the project, removing another significant occupier from the precinct. At the same time, tenant demand in Brisbane has been increasingly focused on higher-quality CBD and fringe locations. This trend continues to place older Milton assets at a competitive disadvantage.

Overall, it is identified that with existing office vacancy rates already high, additional backfill from corporate relocations and project completions will keep Milton under pressure. Without new demand drivers or asset repositioning, the precinct is likely to remain the softest market within the Brisbane Fringe for the foreseeable future.

Shading to Building Facade

2. It is noted that a greater extent of the facade is afforded varying degrees of shading and the individual units now include more operable facade components to support cross flow ventilation and a better outdoor lifestyle. Notwithstanding, some parts of the tower facade require further improvement to ensure facade elements are sufficiently shaded to allow for a genuine reduction in the need for mechanical cooling. This is particularly true for the northeastern and north-western facing facades, though there is some concern with the limited extent of shading afforded to the south-eastern facing (Milton Road Elevation) facade.
- a) Provide amended plans to increase the extent of shading to reduce heat build-up on facades.

Response

As outlined on page 5 of the revised Proposal Plans prepared by Plus Studio, adjustments to the projecting slab edges at the north-eastern and north-western corners of the facades have been made. As noted, the slab protrusion has been increased by 600mm, thereby increasing the shading benefit and link to heat load to these facades.

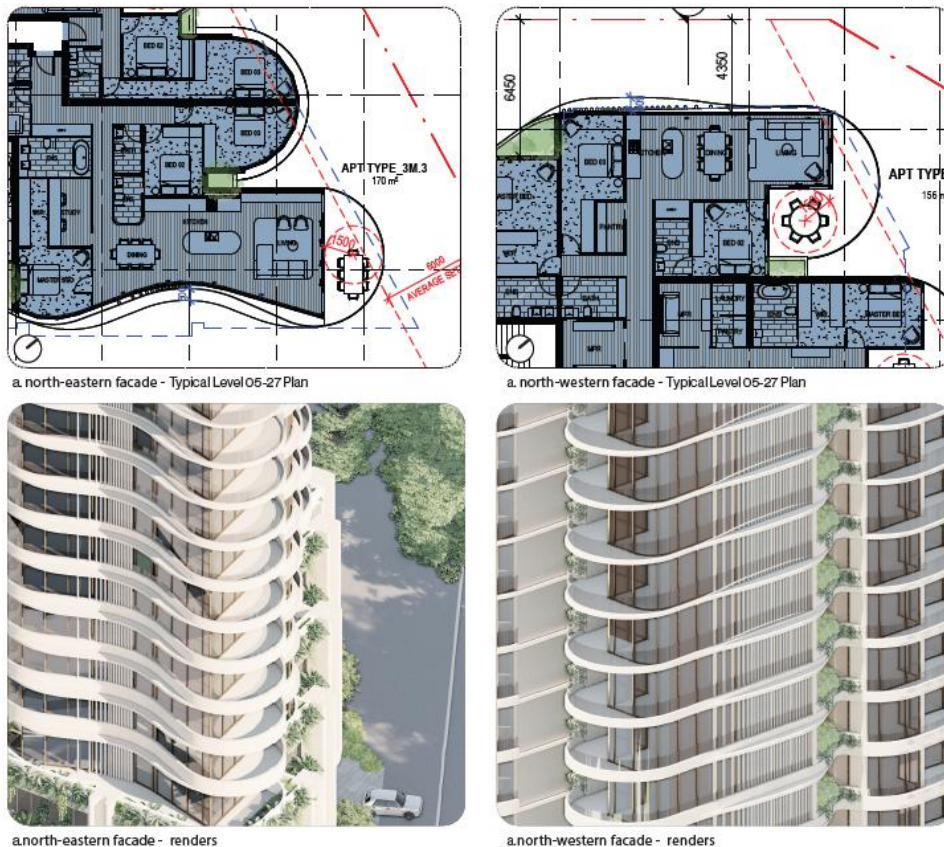


Figure 1: Extract of Sheet 5 and the Amendments to Facades Which Have Been Made – Plus Studio (March 2026)

Mature Vegetation on Site

4. *It is noted that there are existing mature trees on site located near property boundary (three large Jacarandas). Due to the location and size of these trees, it is recommended that these trees are retained and incorporated into the design especially as there is no basement proposed to be constructed under these trees. These trees also offer an opportunity for enhanced landscaped outcomes and improved pedestrian amenity as well as placemaking through public art and creative lighting*
- a) *Provided amended architectural and landscape concept plans showing the retention of the three large Jacarandas.*
 - b) *Amended plans should incorporate public art and creative lighting.*

Response

It must be noted that current approval, A006315084, for Office and Food and Drink Outlet, approved by Council on 1 March 2024, allows the removal of the three large Jacaranda trees. These trees were not retained through the previous approval and are not proposed for retention through the current proposal, due to the extent of proposed works (noting the approval and current proposal present consent basement extents) and the condition of the existing trees. The revised landscape plan which accompanies this response identifies several large features trees be provided as part of the proposed landscape outcome. As outlined, a new Jacaranda will be planted within the corner truncation of the site, which is to be advanced pot size, and once established, will contribute significantly to the streetscape and more generally pedestrian amenity. As indicated in the response prepared by Dunn Moran (see sheet 13) the significant Jacaranda located within the road verge will remain in place. It is further noted that the substantial street trees to Coronation Drive are to be retained.

Creative lighting is proposed and can be conditioned by the Council. The conditioning of this outcome is expected to be consistent with that of the existing approval over the site. While the details of the creative lighting will be established as part of the detailed design process, the proposal presents considerable opportunities for such lighting both at the roof cap and through the podium.

Building overhang into Verge

5. *The architectural plans indicate that parts of the building overhang onto the proposed dedication area of the verge, which is not supported.*
- a) *Provide amended plans showing no building encroachment into the verge.*

Response

The revised Proposal Plans prepared by Plus Studio confirm the removal of the previous awning overhang, such that no buildings/awning is proposed within the dedication area of the verge along Coronation Drive. Benefit was initially seen in providing this overhang for an awning over the voluntary verge dedication however the Council's advice is acknowledged, and the overhang has been removed.

Virtual Brisbane Model

6. *Submit a 3D virtual Brisbane model to assist with assessment of the proposed built form in the context of the site and its surrounds.*

The link below is to an e-form outlining 3D model submission requirements for Virtual Brisbane.

Note 1: BIM submission (.rvt or .ifc) is preferred. If BIM is not available, Council accepts traditional 3D formats (i.e. .fbx, .obj, .3ds, .skp).

Note 2: Ensure the supplied model includes the existing property boundary.

Please complete the e-form prior to 3D model submission as this provides guidance on 3D requirements to ensure supplied data is compatible and fit for purpose. You may be asked to resupply data if there are significant departures from the supplied 3D model and e-form.

After you complete the e-form, a Virtual Brisbane officer will email you a ShareFile hyperlink to upload the model. Please do not issue data via your own file transfer service (e.g. Dropbox, Google Drive). Citrix ShareFile is Council's preferred method of file transfer.

The e-form consists of several key parts:

- Part 1: Model usage conditions and intellectual property
In order to achieve compliance, provide amended plans showing an increased setback distance to these elements of the building.*
- Part 2-3: Model technical details (e.g. file format, file size, model inclusions and exclusions, data hygiene)*
- Part 4: Model particulars (e.g. model currency/date of last update, site address) and electronic signature e-form:
<https://www.brisbane.qld.gov.au/virtualbrisbane3drequirements>*

If you have any questions please email researchandmodellingunit@brisbane.qld.gov.au or phone the Research and Modelling Unit on 07 3178 0852 or Council's Contact Centre on 07 3403 8888.

Response

A Virtual Brisbane 3D model has been prepared by Plus Studio which provides the proposed built form in the context of the site and its surrounds in accordance with the above requirements to assist Council in its assessment of the subject and future development applications.

Private Open Space

7. The private open spaces are required to have a minimum area of 12sqm with a minimum dimension of 3m in accordance with AO31.1/PO31 of the Multiple dwelling code. It is not clear from the plans if these requirements have been satisfied.

a) Provide amended plans, annotating the minimum dimensions as required by the Multiple dwelling code.

Response

All open space areas have a minimum area of 12 square metres with a minimum dimension of 3 metres, in accordance with AO31.1/PO31 of the Multiple Dwelling Code, as is annotated on sheet 8 and the typical drawings for Level 4 and Level 5 – 29 (sheets 37 and 38) within the revised Proposal Plans.



Figure 3: Plan Extract Showing Minimum 3m Dimension for all Private Open Space Areas – Plus Studio (March 2026)

Podium Planting

8. *The proposed perimeter podium planting is supportable, however there are some concerns regarding the proposed planting, particularly in relation to the ability to accommodate substantial draping plants to screen the carpark despite the provision of two rows of planters per floor. There is support for the angled shape of the planter as it adds visual interest to the façade, however there are concerns about the depth and width of the planter base.*

Additionally, it is essential to confirm how maintenance access will be achieved for the planters, especially considering that they are placed behind perforated metal screens and further on extruded building blades.

- a) Provide updated plans, sections and elevations showing external planter beds to the Graham Street frontage.*
- b) Provide confirmation of depth and width of planter boxes and submit revised drawings in accordance with PO15 of the Landscape work code and Table 1 of the Landscape design planning scheme policy.*
- c) Provide information on how the planters will be accessed for maintenance purposes.*

Response

In response to the Council's request, the following revisions to the Landscape Concept Plan have been made:

- Inclusion of planters to the Graham Street frontage have been made as evident on SD-03 and SD-04 of the landscape package.
- The majority of planters are to be approximately 4m long and have a depth & width of 800mm x 950mm this provides a volume of 4 cubic metres. This is sufficient to sustain planting. Dimensions have been provided on the sections to show width and depth. Please see Section A and Box SD-09.
- The inclusion of maintenance access has been provided for the planters with plans and sections being updated accordingly, please see plans SD-03, SD-04, SD-09 and SD-11.

Irrigation

9. *Whilst shown on the architectural set of plans, the landscape concept plan does not include any details of proposed maintenance access or location of tanks for irrigation of planters. Further information is required to demonstrate that the proposed extent of planting is viable long term.*

- a) Provide an updated Landscape Concept package which demonstrates;

 - (i) The location of water storage for irrigation of all site landscaping to address Landscape Works Code PO12/ AO12 and PO13/ AO13. Provide detailed estimates of required water consumption for irrigation (Irrigation Association of Australia).**

Proposed size and location of rainwater catchment and storage tanks for irrigation, sufficient to supply at least 95% of irrigation needs.

- (ii) *A maintenance access plan which demonstrates both access for regular maintenance and access for future replacement of planter systems including plants, soil media and irrigation and waterproofing to address Landscape Works Code PO13./ AO13*

Response

An amended Landscape Concept Plan prepared by Dunn and Moran Landscape Architects, and in particular drawing SD-02, have been amended to include additional information regarding irrigation and water storage capacity.

Parking

10. The proposed plans show an over-supply of resident car parking spaces, and an undersupply of visitor car parking spaces, which does not comply with Table 13 of the Transport, access, parking and servicing planning scheme policy (TAPS PSP).

It is also noted that tandem car parking spaces are proposed. Tandem car parking spaces are required to be allocated to the same unit.

- a) *Submit revised plans showing 11 resident car parking spaces re-allocated to visitor car parking spaces to achieve a minimum number of 29 visitor car parking spaces in accordance with PO14 of the TAPS code and Table 13 of the TAPS PSP.*
- b) *Provide amended plans that show tandem car parking spaces are required to be allocated to the same tenant as per PO1 of the TAPS code.*

Response

A detailed response to Items 10 (a) and (b) has been provided within the accompany Traffic Engineering Response prepared by Colliers. In response to item (a) it can be summarised that given the sites proximity to the City Core, accessibility to public transport, extent of resident parking provided, limited on-street parking amongst other factors that the proposed 19 visitor car parks is a performance-based and context-appropriate outcome for the site.

Regarding item 10(b) it is reaffirmed that all tandem spaces will be allocated to the same unit.

Service Vehicle Swept Path Plan

11. The proposed LRV swept path plan appears to show a conflict between the manoeuvring path and existing on-street parking areas.
- a) Submit a revised LRV swept path plan prepared by an RPEQ showing no conflicts with existing on-street car parking areas in accordance with PO3 and PO18 of the TAPS code.

Response

A detailed response has been provided by Colliers, which accompanies this response. Drawing 23BRT0684-01 within Attachment B of the provided response includes swept path analysis which demonstrates and LRV can manoeuvre in and out of the site in forward gear.

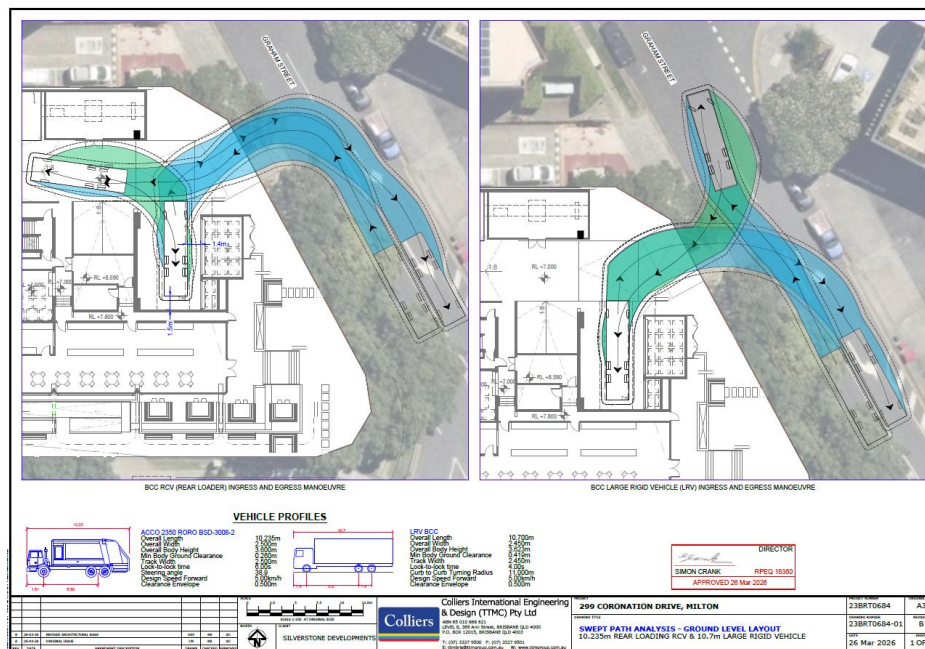


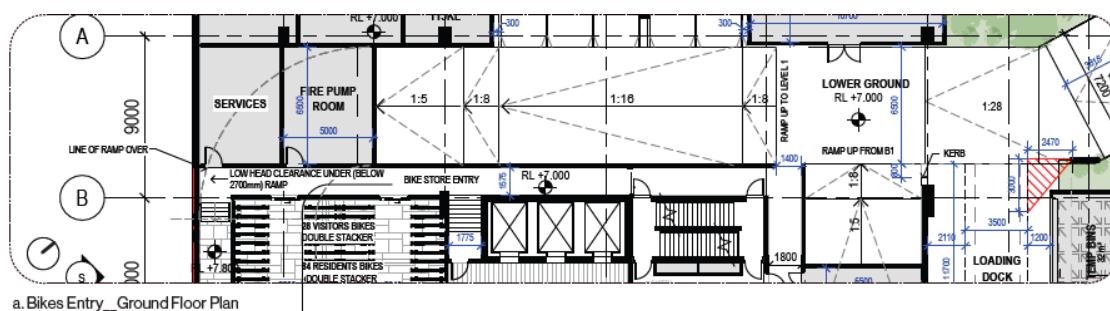
Figure 4: Extract of Colliers Swept Path Analysis for LRV – Colliers (26 March 2026)

Access to Bicycle Parking Areas

12. The proposed plans appear to show doorway and corridor areas which do not maintain a minimum accessway width of 1.5m through the site to bicycle parking areas as required by the PO4 and PO5 of the TAPS code and AS2890.3:2015 Figure 2.4 (for low volume/constrained areas).
- a) Submit revised plans showing a minimum access width of 1.5m as required by PO4 and PO5 of the TAPS code and AS2890.3:2015 Figure 2.4. It is recommended that doors which are required to be accessed by cyclists are amended to sliding doors to improve accessibility.

Response

As detailed on the revised Proposal Plans the bike store accessway has increased in width to 1.575m, see plan extract below.



a. Bikes Entry_Ground Floor Plan

Bike entryway is widened to be greater than 1.5m

Figure 5: Extract of Proposed of Bike Store Entryway – Plus Studio (March 2026)

Bin Storage Areas

13. It is noted that the 'Loading Dock' contains a 'Dual refuse chute integrated compactor 3:1 compaction applied to general waste only', a separate 'retail bins' enclosure, with residential 'Temp Bins' refuse enclosures located on either side of the RCV loading bay. The design of the residential refuse enclosures containing the twelve (12) x 1,100L bulk bins, 'dual refuse chute' enclosure, residential refuse enclosure and retail refuse enclosure each containing two (2) x 1,100L bulk bins are not functional, with insufficient width provided between door openings for the required number of bins to be stored or additional space provided to enable circulation/manoeuvring of bins.

In accordance with AO32/PO32 of the Multiple dwelling code, AO63.1 and AO63.2/PO63 of the Centre of mixed use code and AO8.1 and AO8.2/PO8 of the Infrastructure design code provide amended architectural plans which shows the following:

- a) Show the 'residential' refuse enclosure containing the twelve (12) x 1,100L bulk bins has been increased in size and provided with a minimum GFA of 24.45m² (internal dimension of 5.34m wide x 4.58m deep) to house twelve (12) x 1,100L bins, with additional space for manoeuvring of bins during servicing.
- b) Show the 'residential' dual refuse chute, residential refuse and 'retail' refuse enclosures which each contain two (2) x 1,100L bulk bins have been provided with a minimum width between the door opening of 3.06m to enable both bins to be manoeuvred.
- c) Clearly label the location of the 'residential' refuse enclosures, 'residential' dual refuse chute, and retail refuse.
- d) Show the residential and retail refuse enclosures have been provided with roller doors or the like in lieu of swing doors, given the available space

between the standing location of the RCV and enclosures. Ensure the engineering plans align with the architectural plans.

e) Ensure the GFA and internal dimensions of the residential refuse and retail refuse enclosures have been annotated on the amended plans.

Response

In response to Items 13 (a) – (e):

- The residential bin store and compaction unit have been redesigned and relocated to be more centrally located within the core of the ground floor and consists of a total area of 54m²;
- All bin store areas are now appropriately labelled;
- All refuse storage areas have incorporated roller doors in place of swing doors; and
- Internal dimensions and gross floor area for refuse areas has been provided.

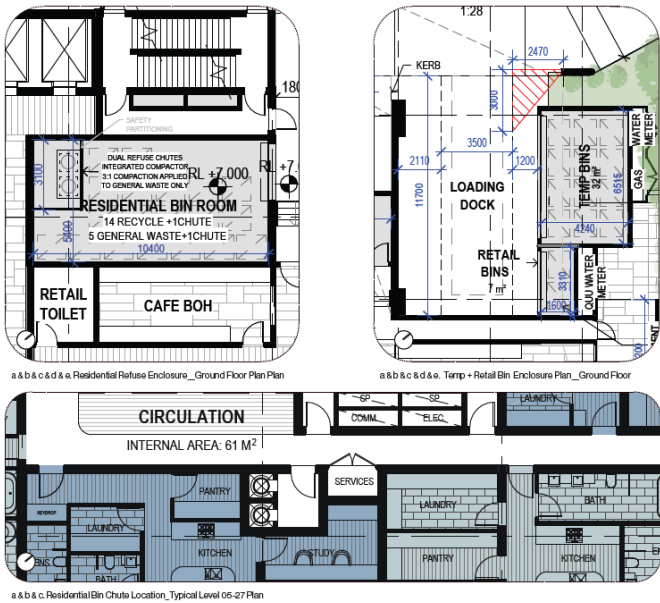


Figure 6: Extract of Proposed Refuse Storage Areas – Plus Studio (March 2026)

Refuse Vehicle Swept Path

14. The swept path analysis indicates that the clearance envelope of the RCV swept path conflicts with the PWD bay, planter box, and built form. Furthermore, the RCV swept path egress manoeuvre conflicts with the legally parked vehicles parked with the 2P on-street parking on Graham Street.

a) Submit a revised RPEQ certified swept path analysis for a 10.24m Rear Loading RCV (As per BSD - 3008-2) as specified in Table 3 of the Refuse PSP which demonstrates safe and efficient on-site servicing can be undertaken and in accordance with the PO32 of the Multiple dwelling code, PO8 of the Infrastructure design code and PO63 of the Centre or mixed use code.

b) Ensure the swept path and additional clearance envelope does not conflict with parking bays, built form or on-street parking bays during the RCV access or exit manoeuvres.

Response

As outlined in the Traffic Engineer Response, drawing 23BRT0684-01 demonstrates that the manoeuvring of a 10.24m rear-loading RCV, as specified in Table 3 of the Refuse PSP, can be achieved in compliance with PO32 of the Multiple Dwelling Code, PO8 of the Infrastructure Design Code and PO63 of the Centre or Mixed-Use Code. Regarding item 14(b) a 500mm clearance envelope has been adopted in accordance with the TAPS Code and does not conflict with parking bays or on-street parking areas.

Aisle Width

15. The proposed two-way aisle width to be trafficked by the Refuse Collection Vehicle (RCV) is less than 6.5m wide (6.2m) and is not supported

Furthermore, the development proposes a Type B1 crossover accessed by the RCV in lieu of the required Type B2.

- a) Provide amended architectural plans which show two-way aisle/carriageway trafficked by the RCV is a minimum of 6.5m accordance with AO32/PO32 of the Multiple dwelling code, AO63.1 and AO63.2/PO63 of the Centre of mixed use code and AO8.1 and AO8.2/PO8 of the Infrastructure design code, AO1/PO1, AO19.2 and AO19.3/PO19 of the TAPS code and Table 12 of the TAPS PSP.*
- b) The amended architectural plans are required to show a Type B2 crossover.*

Response

The revised ground floor plans include an aisle width for vehicle manoeuvring which has been increased to 6500mm as requested by the Council.

As outlined within the response provided by Colliers, the purpose of a Type B2 splay is to allow design vehicles to access driveways from the kerbside lane. With the kerbside being obstructed/occupied by on-street parking bays the extent of the splayed is determined to be unnecessary in this case. The provide swept paths demonstrate that the design vehicle must enter from the carriageway rather than kerbside to avoid on-street parking.

Fuel Burning – Back-Up Fire Pumps and Generators

- 16. Provide further details on any proposed uses that require the burning of a fuel such as diesel, natural gas/LPG for fire pumps, flood pumps and stand-by generators. If such plant/equipment are proposed, the following further details are required:*
- a) Maximum and cumulative fuel burning capacities of all such uses in MW;*

- b) Plant location and associated specifications;*
- c) Hours used per year, including monthly testing as per manufacturer's advice;*
- d) Amount and type of fuel used and stored, including bunding and compliance against AS1940 if flammable and combustible liquids are proposed;*
- e) Compliance with AO16/PO16 of the Flood overlay code for dangerous good storage in a flood zone; and*
- f) External vent location/s and the management of potential amenity impacts such as air and noise both for on-site and adjacent sensitive uses.*

Response

A back-up / power generator does not form part of this application at this point in time.

Acoustic Report

17. The Assessment Report and associated documents reference an acoustic report by Acoustic works however, this report has not been received. Please forward a copy of this report for evaluation or address the relevant noise provisions as per the applicable use and overlay codes ie Multiple dwelling code, Centre or mixed use code, Transport noise corridor overlay code and Industrial amenity overlay code.

Response

An updated Acoustic Report was prepared by Acoustic Works was submitted to the Council as part of our previous letter dated 28 January 2026. For completeness, the previous report accompanies this response.

Basement and Podium Car Park – Exhaust Air Vents

- 18. Provide further details or demonstrate that air emissions from the basement and podium car park exhaust vents comply with the prescribed 15m setbacks for both on-site and adjacent sensitive uses or provide air quality reports addressing the following:*
- a) AO20.1b/PO20 of the Multiple dwelling code; and*
 - b) AO3.3/PO3 of the Centre or mixed use code.*

Response

As indicated on the revised Proposal Plans, specifically podium levels 1 to 3, solid wall inclusions have been made to achieve the minimum 6m separation to the basement exhaust, as required by the relevant Australian Standard. This outcome has been coordinated with the consultant air quality consultant, Trinity Consultants, with reporting to be provided when finalised.

We trust the above and accompanying information suitably addresses the comments of the Council however should further clarification or information be required please contact our office. In accordance with the requirements of the Planning Act, public notification will now commence

Yours faithfully

URBAN STRATEGIES PTY LTD



**Geoff Gibbons
DIRECTOR**