



**City Planning and Economic Development Services
Development Services**

Brisbane Square, 266 George Street, Brisbane Qld 4000

GPO Box 1434 Brisbane QLD 4001

T 07 3403 8888

brisbane.qld.gov.au

Dedicated to a better Brisbane

19 August 2026

Cbus Property C3 Pty Ltd
C/- Urbis Ltd
Level 32, 300 George Street
BRISBANE CITY QLD 4000

ATTENTION: Sarah Davies

Application Reference: A007073249

Address of Site: 280 ELIZABETH ST BRISBANE CITY QLD 4000

Dear Sarah

RE: Information request in accordance with the Development Assessment Rules

Council has carried out an initial review of the above application. Council acknowledges the site's strong city centre location and the positive intent of providing a large triple-height, open-air plaza and cross-block connection through the site. It is considered that there are further opportunities to refine how the proposal responds to Elizabeth St, the site's heritage context, laneway connections and maximise public benefit to create a high-quality subtropical public realm. The following has identified that further information is required to fully assess the proposal.

Whilst Council has outlined these opportunities and information below, it is important to note this application is impact assessable which will require public notification. Council's assessment of this application will take into consideration submissions received during the public notification process.

Publicly accessible spaces and streetscape activation

1. The development proposes large columns positioned along the property boundary, particularly at the Elizabeth Street frontage that present some limitations to the potential activation of, and pedestrian accessibility to the proposed publicly accessible ground floor area. There is an opportunity to strengthen the ground level interface and connectivity along this frontage.

The triple height public plaza does provide a public benefit, however there is an opportunity to deliver an inviting public realm for all by providing sufficient visual permeability. The width, depth and frequency of columns create obstructions to the views and pedestrian permeability from the public footpath into the internal plaza and out towards the street. It appears that not all proposed columns are required for structural purposes and legibility of the internal public space could be improved by narrower columns and by decreasing the frequency of the structures.

- a. Provide amended plans that show smaller and less frequent columns, ensuring a higher degree of physical and visual permeability. Stepping the columns deeper into the site will result in improved engagement with the internal public realm and provide further additional weather protection. The last column on the eastern side could be removed or placed deeper within the site to create further opportunity for

uninterrupted pedestrian traffic flow and public to access to the plaza space and integrate with the adjoining site.

- b. Review the design to ensure active spaces are provided that front onto and enliven Elizabeth Street and Edison Lane. In the instance of Edison Lane, it is suggested that a rear entry to the plaza or ground level lift lobby may be sufficient to achieve a suitable level of activation to this public space. Alternatively, services may be rearranged to provide a larger access way to Edison Lane at the north-western corner of the plaza.
- c. Demonstrate a clear public benefit, with an improved ground plane that invites public use with visual openness and legibility between Elizabeth Street, the plaza, Post office lane and Edison Lane. Consideration should be given to refine the ground plane with improved activation, visibility, seating, shade, high subtropical landscape quality, pedestrian comfort and genuine public access that responds to the architectural language and public realm context.

Best practice climate responsive design

- 2. The proposed design of the tower does not include shading elements to the glazed facades, particularly the north-western façade facing Edison Lane. These design aspects can assist in satisfying the requirements of PO3 of the City Centre neighbourhood plan. Further justification is required to demonstrate that the tower design and materials can satisfy the requirements of PO3 of by reducing solar heat gain and lowering the need for mechanical cooling.
 - a. Provide further information on the proposed design strategy to clearly demonstrate best-practice climate-responsive design that can protect future amenity of the building occupants specifically the north-western façade in accordance with PO3 of the City Centre neighbourhood plan.

Building shadowing

- 3. The proposed tower is required to demonstrate potential shadowing impacts and respond to the availability of sunlight to the nearby civic spaces.
 - a. In accordance with PO23 of the City Centre neighbourhood plan, provided suitable shadow diagrams demonstrating that the proposed development can respond to the availability of sunlight for surrounding civic spaces.

Plan details

- 4. The plans do not include dimensions for all proposed setbacks.
 - a. Provide amended plans showing dimensions for all proposed setbacks e.g. both side setbacks.
- 5. The floor plans provided do not illustrate how the proposed Food and drink outlet will function, how it is orientated or specific internal details such as sink/kitchen/food and drink preparation area, serving and any dining areas.
 - a. In accordance with AO12.1 of the Centre or mixed use code, provide amended plans showing the general layout of the proposed Food and drink outlet.

Public art and creative lighting

- 6. The development is required to provide artwork within the site to enliven the public realm as per PO24 and PO25 of the City Centre neighbourhood plan code.

- a. Submit an initial art opportunities report demonstrating that artworks will be integral to the project design, will enhance the quality of light, cultural tourism and point of difference in the marketplace and will be accessible from the public realm.
7. The development is required to provide high-quality lighting that enlivens the cityscape at night and reinforces the building's daytime and night-time presence.
- a. In accordance with PO26 of the City Centre neighbourhood plan, provide an initial creative lighting opportunities report outlining locations for creative lighting. The applicant is encouraged to consider the theme of lighting for identity, lighting for discovery and lighting for occasion as outlined in the 2017 City of Lights strategy.

Stormwater

8. The proposed Lawful point of discharge (LPD) and upslope property connection (Lot 33 RP48556) point being an "existing" stormwater line within Elizabeth St verge and carriageway needs to be confirmed. Appendix B of the Stormwater Management Plan indicates an existing 300dia stormwater pipe is present within Elizabeth St. Council's mapping system has no record of a Council stormwater line within Elizabeth St nor details of where this line connects to. The provided survey plan is not definitive in determining if the line is present, the asset owner, the function of the line or the condition. It is suspected the pipe is an old private foul water line or sewer line (either are not a Council asset) which is not lawful point of discharge.
- a. In accordance with AO3.3, AO11.1 and AO11.2 of the Stormwater code, assess the status of the pipe and confirm that it is fit for purpose. Pending this investigation, a revised lawful point of discharge for the site and the upslope property connection may need to be demonstrated.
 - b. Demonstrate/confirm the "existing" pipe within Elizabeth St discharges/connects to existing known Council stormwater pipes in Creek St by providing CCTV footage/survey of the line within Elizabeth St to existing Creek St Council stormwater Infrastructure.
9. The reduction of the carriageway of the access on the western boundary of the site (between Elizabeth St and Edison Lane) will remove existing stormwater field inlets within the accessway. The Stormwater Management Plan does not address how the existing surface flow within the accessway will be managed without the field inlets collecting and directing the flows to a LPD.
- a. Demonstrate how surface flows within this area will be collected and connected to a lawful point of discharge.

Existing easement

10. It is understood the access easement along the western boundary is being maintained by the proposal. However, the physical carriageway width of the current access way is proposed to be reduced.
- a. Provide details of any alterations/reduction to the existing access crossovers (Elizabeth St and Edison Lane) to align with the reduced access way width.

Access and servicing

11. Whilst the separate vehicle access for the car lift access and service vehicle area can be supported in principle, no details on the width of the proposed crossovers are detailed on the plans.
- a. In accordance with PO3 and PO15 of the TAPS code, provide revised plan(s) detailing the width of the crossovers.

12. There appears to be discrepancy between the architectural plans (ground floor) and the RPEQ prepared swept path plan of the service vehicle manoeuvring. It appears the built form shown on the architectural plans will be impacted by the swept paths of the service vehicles. The MRV and RCV manoeuvring appears to conflict with the built form on the western side of the bay entry.
 - a. Clarify this discrepancy and revise the architectural plans and/or the swept path plans.
13. The VAN manoeuvring appears to conflict with the build form on the eastern side of the bay entry.
 - a. Clarify this discrepancy and revise the architectural plans and/or the swept path plans.
14. A maximum 1:20 grade for the service bays/area has been clarified within the traffic report. However, this has not been detailed on the plans.
 - a. Provide amended plans showing the grade, along with the service bays dimensions.

Car parking

15. One PWD should be provided in accordance with AO15 of the TAPS code and TAPS PSP requirements. It appears carpark 4 is a PWD given a shared area is indicated adjacent on the proposed plans.
 - a. Clarify and demonstrate on amended plans that a single PWD car space is provided. Dimensions of the PWD space and adjacent shared area are to be provided on the plan demonstrating compliance with AS2890.

Refuse

16. In accordance with PO63/AO63.1, AO63.2 of the Centre or mixed use code, AO19/AO19.2 and AO19.3 of the Transport, access, parking and servicing code and PO8/AO8.1 and AO8.2 of the Infrastructure design code, provide the following:
 - a. Provide amended architectural plans (Drawing No. DA_1100), clearly demonstrating the full dimensions of the proposed 'Bin Store' i.e. widths, lengths and area.
 - b. Provide amended architectural plans (Drawing No. DA_1102), clearly demonstrating the full detail of the proposed loading dock and service area i.e. widths, lengths, area and gradients.
 - c. Clearly identify and demonstrate the location and dimensions of the proposed crossover from Edison Lane to the development on amended architectural plans and swept path analysis.
 - d. Provide amended RPEQ certified RCV swept path analysis which demonstrates the RCV, including 500mm clearance envelope does not conflict with internal infrastructure, structural columns, neighbouring buildings or any other obstructions. Note: an alternative design vehicle may be utilised with supporting evidence.
 - e. As the development includes Health care services which may produce regulated or related waste, sufficient demonstration that correct storage of this stream has been considered and designed for must be provided i.e. separate/secured storage area within the bin store or individual tenancies.

Noise emissions

17. Noise emissions from the proposed function areas on at least two separate levels (end of trip level and upper-level terrace) have not been adequately assessed in the submitted Noise Report. The note in AO1 of the Centre or mixed use code for a Function Facility causes the assessment for a Function Facility to be under PO1 of the Centre or mixed use code, irrespective of the Principal Centre zone. The noise report does not assess emissions from amplified sound/music and patrons outdoors/indoors. A full assessment of all noise sources using PO1 of the Centre or mixed use code is required, with the noise planning criteria applied to amplified sound/music and all patron noise outdoors/indoors. The low frequency noise criteria applies to amplified sound/music only.
 - a. Submit a revised report which is complete in its assessment of all proposed areas associated with the Function facility portions of the development.
 - b. Assess AO2.3 of the Indoor sport and recreation code and include information about proposed activities and their hours of operation. Whether any amplified sound/music is proposed must be included in the response to address this particular outcome.

Air quality

18. Air emissions for the proposed basement car parks and the presence of various restaurant/cooking venues and their location to on-site and adjacent sensitive uses have the potential to impact on the air quality amenity of such sensitive land uses/zoning.
 - a. Submit further information demonstrating that the proposed use can comply with the acceptable outcomes as prescribed in AO3.1 – AO3.3 of the Centre or mixed use code. Where compliance cannot be achieved, submit an Air Quality Report in accordance with PO3 and PO20 of the Codes respectively. Further guidance can be found in the Air Quality Planning Scheme Policy.

Fuel burning

19. There is potential for Fuel Burning associated with proposed fire pumps and/or any proposed power generators for equipment such as lifts and computation equipment associated with the proposed office use. Therefore, assess the industrial planning use for Fuel Burning under Table SC1.1.3.A—Industry thresholds and address the Industry code for air and noise emissions at AO/PO1 and AO/PO2. The industrial use definition applies to the cumulative power of all equipment.

Acid sulfate soils

20. The site is located within the Potential and actual acid sulfate soils overlay. The application therefore needs to demonstrate that the site is not affected by, or will not disturb, actual or potential acid sulfate soils.
 - a. Submit information on whether the development includes soil disturbance at or below 5m AHD and involving excavating or removing equal to or greater than 100m³ of soil, soil disturbance (including filling) greater than 500m³, or filling equal to or greater than 0.5m average depth. Where the above soil disturbance is involved, provide an Acid Sulfate Soils (ASS) Investigation Report and Management Plan prepared by an appropriately qualified and experienced person, and prepared in accordance with relevant policies/guidance materials and technical guidelines/manuals such as:
 - i. State Planning Policy and SPP Guidance Materials;
 - ii. Queensland Acid Sulfate Soil Guidelines: sampling guidelines; laboratory methods guidelines/manuals; and

- iii. Queensland Acid Sulfate Soil Technical Manual: Soil Management Guidelines.

Urban Utilities (UU)

Council does not undertake water and sewer assessment of any planning applications. Contact UU on (07) 3432 2200 to discuss any water and sewer issues and whether you are required to submit an application to UU for assessment.

Responding to this request

Your response should include a summary table which outlines any changes to performance outcomes and plans that have resulted from addressing the issues outlined above. The table should also include details of any supporting documentation.

If a response is not provided within the prescribed response period of three (3) months assessment of the application will continue from the day after the day on which the response period would have otherwise ended.

Email your response to DSPlanningSupport@brisbane.qld.gov.au quoting the application reference number A007073249.

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

Yours sincerely



Chris Dixon
Senior Urban Planner
Planning Services North
Phone: 31787264
Email: chris.m.dixon@brisbane.qld.gov.au
Development Services
Brisbane City Council