

27 April 2026

Urbicus Ref: URB22-310
Primary Contact: Mark Clayton

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Applicant response to Further Advice

Council reference: A006831322
Property details: 457 Adelaide Street, Brisbane City QLD 4000

We refer to the above-mentioned development application and Councils Further Advice letter dated 12th March 2026.

In support of our response the following documents are provided:

1. Architectural Plans prepared by NettletonTribe.
2. Letter dated 04/11/25 prepared by Firerite
3. Irrigation Water Usage, Catchment & Irrigation Strategy prepared by Irrigation Design Australia.

A summary of changes to the architectural plans, in response to Councils Further Advice, is provided below:

- Increase building setbacks to Adelaide Street so that all levels are located outside of the required 5m verge width.
- Core moved toward river by 300mm.
- Reduced landscape planter to Adelaide Street from 800 wide to 500 wide.
- Updated elevations and sections to Adelaide Street verge.
- Adjoining building floorplans incorporated from ground floor mezzanine to Level 7.
- Added electrical control panel for car stacker @ RL10.565.
- Added fire pump room layout and irrigation tanks.
- Reduced boundary blade walls to Howard Street.

We address the specific items raised in Councils “Further Advice” as follows:

Item	Adelaide Street Verge Width and Setback
1	<p>It is acknowledged the submitted plans show the setback to Adelaide Street has been increased. However, the proposed setback is still not sufficient and the buildings placement does not allow for a minimum 5m wide verge to be achieved to Adelaide Street, with elements of the building above and below ground level projecting into this space.</p> <p>Council advises that it has not historically supported tower-level encroachments into the verge or road reserve. Such encroachments permanently limit future public domain flexibility and establish an undesirable precedent for private development within land intended to remain available for public use. While Council has, in limited and exceptional circumstances, supported limited basement encroachments, this has only occurred where a clear and robust planning justification has been demonstrated; and the encroachment delivers a demonstrable public benefit that cannot reasonably be achieved through alternative building design solutions.</p> <p>Based on Council’s assessment, it appears that the proposed encroachments are not necessary to achieve an acceptable built form outcome, noting the proposal is for a new building and no justification for the encroachment has been provided. The development could be reasonably accommodated entirely outside the 5m road reserve with minor design amendments, including modest internal reconfiguration and adjustments to balcony forms, without materially affecting design quality or residential amenity.</p> <p>To enable Council to continue its assessment, and to progress the application, please provide:</p> <ol style="list-style-type: none"> a) Amended plans which demonstrate an increase in the setback of the building, so that all levels are located outside of the required 5m verge width. Council could support the building being built to the new Adelaide Street front boundary where a 5m wide verge is achieved with no building encroachments at ground level or above. b) Where any aspect of the basement is still proposed to encroach into the 5m verge width, it must be clearly demonstrated why the encroachment is necessary and cannot be avoided through reasonable changes to the built form and design. From Council’s review of the plans, it appears the currently proposed basement encroachment only serves to provide access to the substation indicated on the Lower Mezzanine, although it appears that suitable access could be achieved without any basement encroachment. c) Should it be sought to retain any basement encroachment beneath the verge, Council advises that the following minimum requirements must be met: <ul style="list-style-type: none"> – A minimum clear height of 4.5m to the public thoroughfare easement, measured from finished ground level to the awning/building above; and – A minimum soil depth of 1.5m above the basement structure to support to delivery of infrastructure, landscaping and street tree planting.

Response

Building setbacks to Adelaide Street above and below ground ensure the building is located outside of the required 5m verge width excluding the awning.

Refer to Drawings 12829_101, 102, 104, 105, 107, 301, 302 and 311 prepared by Nettletontribe and Figure 1.

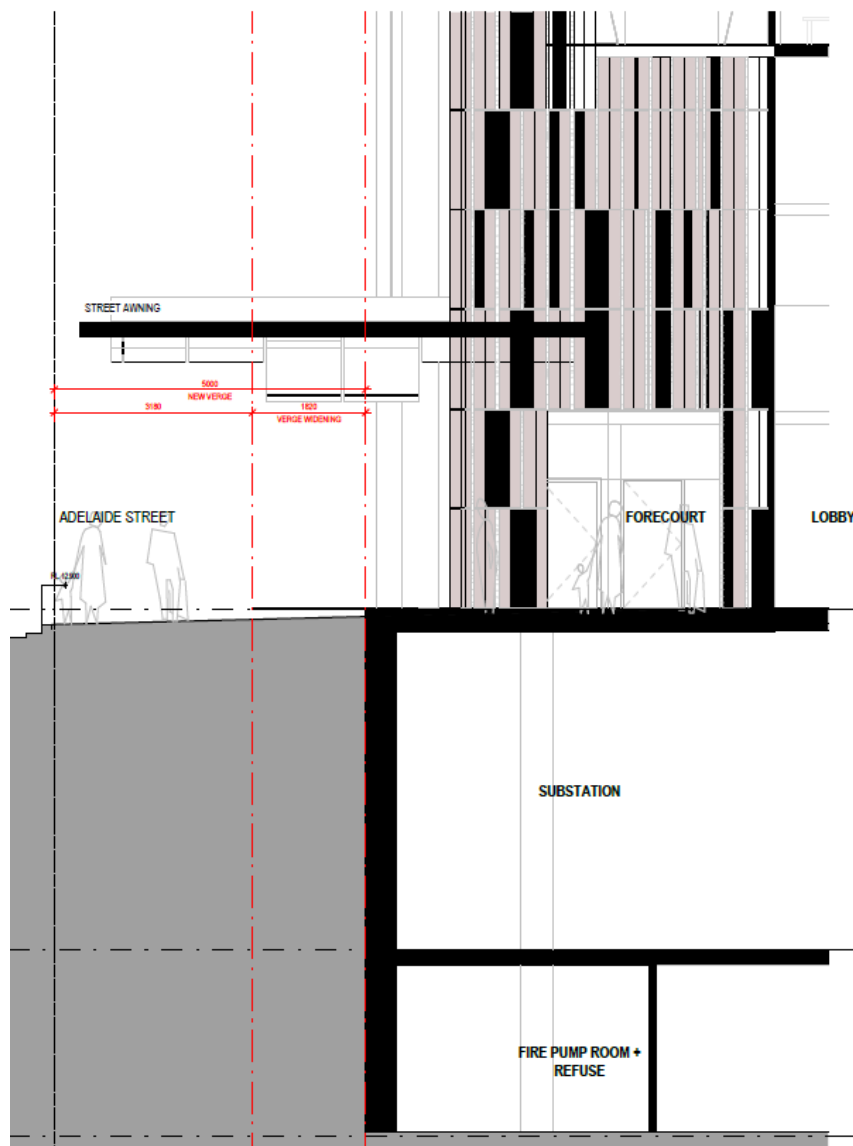


Figure 1 – Adelaide Street Section

Item	Development Site Area and Documentation
2	<p>While some amendments and additional justification have been made, including efforts to demonstrate how adjoining sites could be developed, there remain a number of unresolved items which were previously raised, as detailed below.</p> <ol style="list-style-type: none"> a) Submit floor plans, elevations and cross-sections showing the proposed development, the built to boundary walls and the layouts of habitable rooms/spaces and all windows, balconies and opening of the adjoining developments along the common boundaries. These details must be accurately shown for each level to demonstrate potential adverse privacy and amenity impacts have been mitigated, b) Incorporate privacy screening to all balconies and windows on all levels where mitigation may be required. This must include all balcony edges and glazing oriented towards the side boundaries and increasing landscape planter depths to 1.5m would assist. c) Clearly indicate and annotate the proposed finishes on any built to boundary walls that extend above or beyond the adjoining built to boundary walls. d) Review and provide accurate shadow diagrams showing solar impacts in the month of June. On Council's review it is not clear whether the AM shadows are accurate. e) It is anticipated that the formal dining rooms within the proposed development would have limited access to natural light, should adjoining sites be developed. Further consideration should be given to removing walls between the living and formal dining to ensure sufficient access to natural light is maintained.

Response

The architectural plans have been updated to show:

- Floor plans, elevations and cross-sections showing the proposed development, the built to boundary walls and the layouts of habitable rooms/spaces and all windows, balconies and opening of the adjoining buildings along the common boundaries is provided within the Architectural Plans.
- Privacy screening to all balconies and windows on all levels
- Annotate finishes on built to boundary walls above the adjoining built to boundary walls.
- Shadow diagrams.
- Removal of full height wall separating formal dining and lounge.

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

Response

The recommendations of the Wind Impact Report are incorporated into the Architectural Plans including full height louvred screens within balconies and the eastern façade. Refer to floor and elevation plans prepared by Nettletontribe.

Item	Water Storage for Irrigation
4	<p>The proposed containerised planting throughout the building is supported 'in principle'. However, the plans do not show the required water storage tanks (size or location) as referenced in the information response.</p> <p>Provide amended architectural and landscape plans that clearly indicate the location and size of the irrigation water storage tanks. Note that the tank size may affect the number of car parking spaces or the footprint of the rooftop terrace. In addition, provide the following information:</p> <ul style="list-style-type: none"> a) Detailed estimates of required water consumption for irrigation prepared by a qualified irrigation specialist endorsed by Irrigation Association of Australia. b) Proposed size and location of rainwater catchment capable to supply at least 95% of the irrigation needs.

Response

Refer to Irrigation Water Usage, Catchment & Irrigation Strategy prepared by Irrigations Design Australia.

We note that given the site area, rainwater catchment capable to supply at least 95% of the irrigation needs is not achievable. The Strategy concludes:

*Allowing that “Average Rainfall” occurs then 5,000 litres of storage would hold each season’s highest catchment volumes. Any **shortfall in the Irrigation requirements can be addressed by plant selection and or additional irrigation requiring external Tank fill to cover the shortfall.***

The location of the rainwater tanks is shown on Drawing No. 12829_108 Issue 11 prepared by Nettletontribe.

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

Response

Refer to Drawing No. 12829_104 Issue 11 prepared by Nettletontribe showing location of Car Stacker System Control Panels at RL10.565.

Item	Fuel Burning
6	<p>It is acknowledged that a condition has been requested to be set for maximum fuel burning. However given the constraints of this small site and the resultant floor plates, it is unclear how fuel burning could be provided in the future if it is not suitably considered now and any addition of fuel burning in the future would require a change to the development, regardless of a condition applied by Council now. It is therefore strongly recommended to:</p> <ul style="list-style-type: none"> a) Investigate and confirm the potential fuel burning / back-up generator requirements now. b) Clearly indicate the location of fuel burning / back-up generator on the plans to ensure that it can be accommodated within the building. c) Provide further information on maximum fuel burning capacity in MW; potential hours of use, type and quantity of fuel stored, air quality controls and type of engine.

Response

Refer to letter dated 04/11/25 prepared by Firerite, detailing:

- Need for fire diesel pumps
- Diesel engines
- Maximum fuel burning capacity
- Air quality

Refer to Drawing No. 12829_108 Issue 11 prepared by Nettletontribe and Figures 2 & 3 below detailing location and example of fire pumps, diesel engines and fuel tanks.

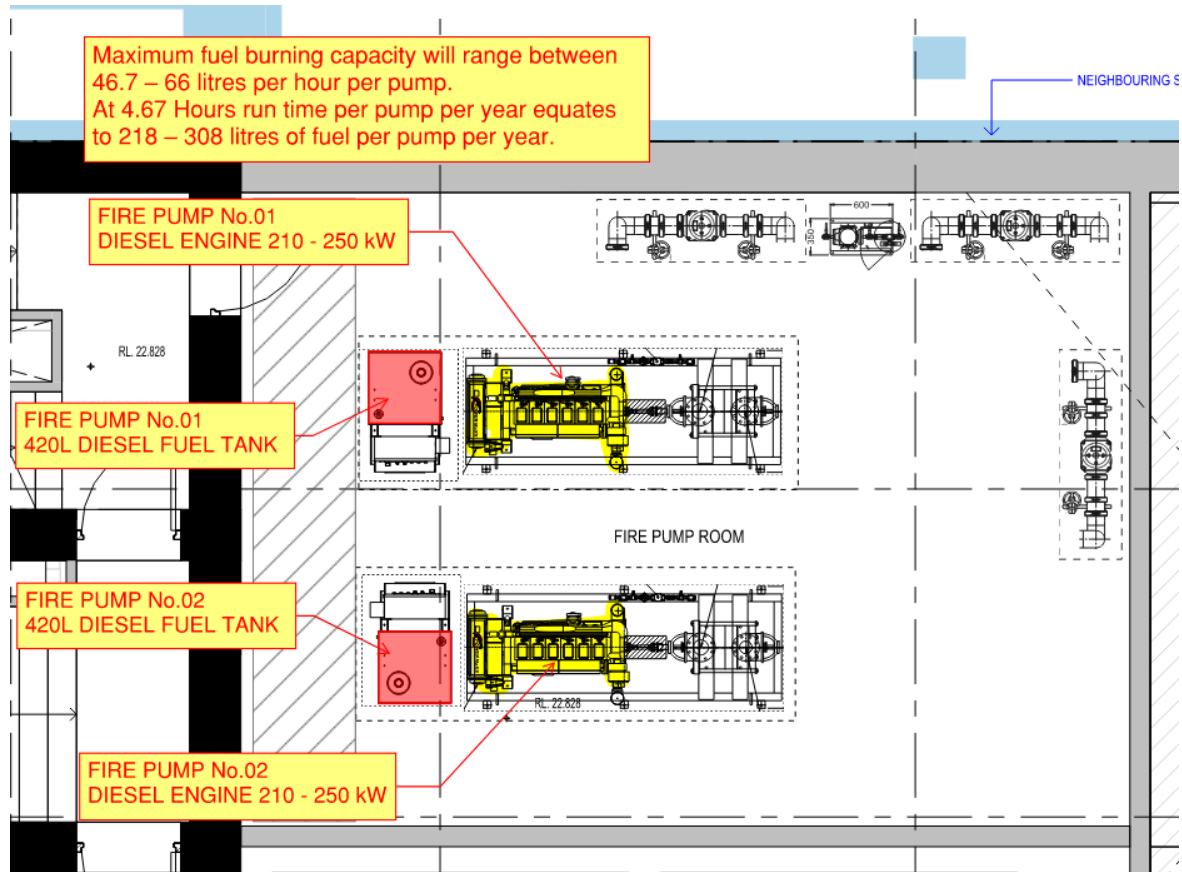


Figure 2 - Fire pumps, diesel engines and fuel tanks.



Figure 3 – Photo of fire pumps, diesel engines and fuel tanks

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

Response

The basement carpark will not be mechanically ventilated and will not have exhaust vents.

The basement car park will be naturally ventilated through the roller door at ground level fronting Howard Street. The top of the roller door is separated more than 15m from the nearest on-site dwelling on Level 2. Refer to Drawing 12829_301 Issue 11 prepared by Nettletontribe and Figure 4.

The basement will not operate as a standard car park that accommodates multiple vehicle movements at any one point in time. The carpark will be an electronic controlled car stacker with only one car operational at any point in time while entering or exiting the car stacker. Cars will idle at the Howard Street entrance to the basement adjacent to the perforated roller door.

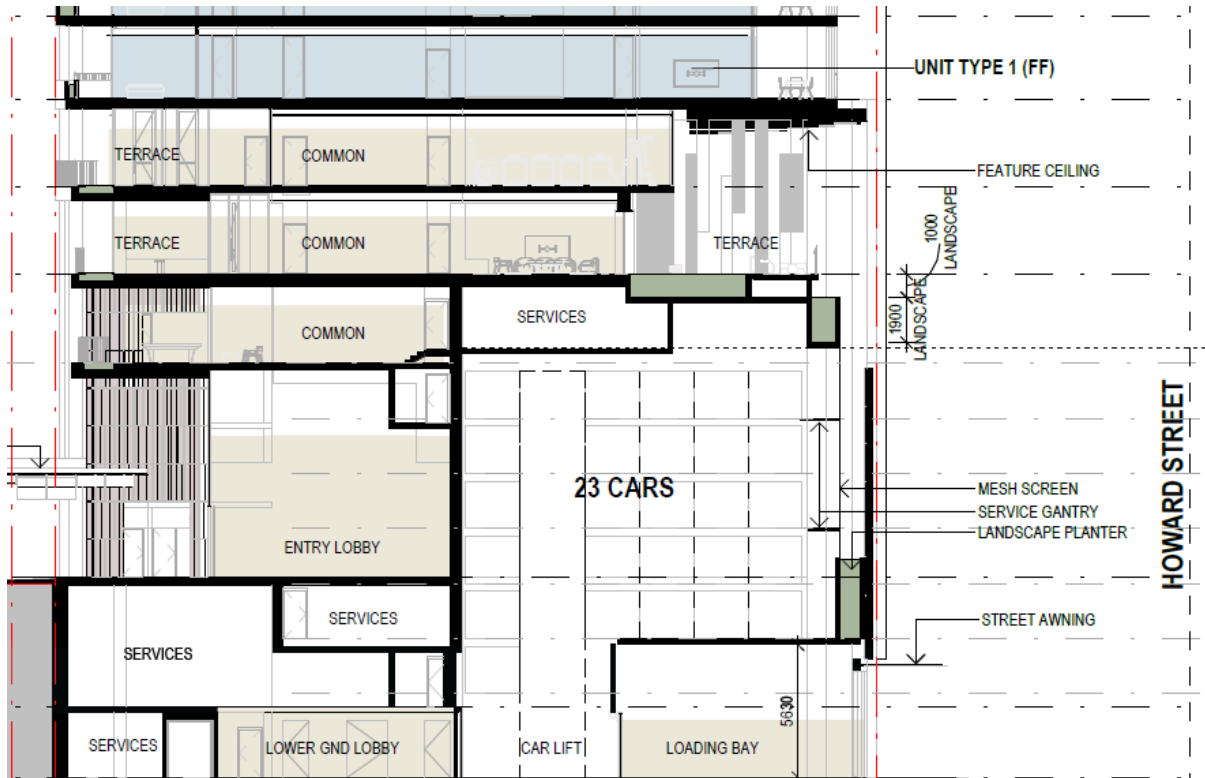


Figure 4 – Building Section

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

Response

We sought clarification from Council on this Item and received the following response:

Hi John,

Council's engineer has reviewed your question and provides the following advice:

In response to the RFI provide further comments/a revised CMP with details on the duration/purpose of the footpath closures/road closure (i.e is this short term, 1 or 2 nights?), this will give us a better understanding of the proposal for our assessment. But long term full footpath closure within the City Core will not be supported, as per the CMP guidelines a gantry should be installed.

I understand Council's engineer attempted to contact you to discuss the above but you were unavailable at the time.

I hope the above information helps, but please contact me if you have any further questions.

Regards

Dominic

Dominic Hudson

Senior Urban Planner, Planning Services North | Development Services

City Planning and Economic Development Services | **BRISBANE CITY COUNCIL**

We have requested further discussions with Council on this matter with no response to date. Accordingly, we request Council condition submission of a construction management plan prior to commencement of on-site works.

Should you have any queries please contact our office.

Kind regards



Mark Clayton

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