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14 September 2026

The Assessment Manager
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

Attention: Chris Dixon, Senior Urban Planner
Delivery via email: chris.m.dixon@brisbane.qld.gov.au

Dear Chris,

Response to Further Advice Request and Notice of Minor Changes in relation to Development Application at Toowong Central (Council Ref.: A006836692)

On behalf of *Toowong Central Investment Holding Pty Ltd (the Applicant)*, please find below and attached a full response to the request for Further Advice issued on 19 August 2026, pursuant to Section 35.1 of the *Development Assessment Rules (DA Rules)*, to assist with Brisbane City Council's (**Council**) assessment and decision of the development application at Toowong Central (Council Ref.: A006836692).

The Applicant thanks Council for its ongoing collaboration and assessment of the proposed development conducted to date. Since the completion of public notification and receipt of Council's second Further Advice, the project team has continued to undertake further investigations and detailed design reviews.

As part of this correspondence, the Applicant has addressed all matters raised by Council in its second request for further information in **Section 2**. Where information has not been provided in the specific manner requested, the Applicant has provided a response detailing its reason, or where appropriate, an alternative outcome to that proposed.

This correspondence also constitutes written notice, pursuant to Section 52(1) of the *Planning Act 2016 (Planning Act)*, of proposed changes to the development application, as identified in the amended plans and supporting technical material. The proposed changes are made in direct response to matters raised in Council's Further Advice Request or otherwise constitute a minor change. In accordance with Section 26.1(c) of the DA Rules, the assessment process does not stop where the assessment manager is satisfied that any change that is not a minor change is in direct response to matters raised in Council's Further Advice or a properly made submission. Accordingly, the Applicant respectfully requests that Council accept these changes and confirm that the assessment process continues in accordance with Part 5 of the DA Rules.

This response is accompanied by and should be read in conjunction with the following supporting material:

- **Appendix A** – Revised DA Form 1;
- **Appendix B** – Revised Architectural Drawings, prepared by *Kerry Hill Architects (KHA)*, *Hunt Thompson Associated (HTA)* and *Cottee Parker*;
- **Appendix C** – Revised Statement of Landscape Design Intent, prepared by *Urbis and PWP*;

- **Appendix D** – Acoustic Response, prepared by *E-Lab*;
- **Appendix E** – Traffic Engineering Response, prepared by *Colliers*;
- **Appendix F** – Waste Management Response, prepared by *Colliers*;
- **Appendix G** – Flood Engineering Response and Revised Engineering Report, prepared by *ADG*.

1 Heritage Place Relocation and Refurbishment

Council has previously requested additional information on the treatment of the *Carver and Co.* building within the broader redevelopment of the site, detailed in the Further Advice request dated 8 May 2026.

As noted in the Applicant's response lodged to Council on 3 July 2026, the project team were further investigating and preparing the required supporting material to provide Council for consideration. Supplementary material was provided to Council on 28 August 2028, which included heritage architecture drawings, including detail on the full extent of new works that accompany the relocation proposal.

We acknowledge that Council may seek further advice following its review of the heritage material submitted to date. The Applicant and the project team remain committed to working collaboratively with Council to achieve an appropriate heritage outcome and are willing to consider reasonable mechanisms, including development conditions, that provide Council with confidence regarding the delivery and ongoing management of heritage outcomes as part of the development.

2 Response to Further Advice

Each item from Council's request for Further Advice, dated 19 August 2026, has been outlined below (*in italics*) along with the Applicant's respective response for each item.

2.1 Podium Design

Item 1

It is acknowledged that the proposed podium height has been reduced within five storeys in some parts of the site. This is apparent where located at the side boundaries of the adjacent sites at the corner of Jephson Street and Sherwood Road. However, some podium walls would benefit from greater variation in the wall plane, as they will remain visible from nearby streets and may still present with a bulky appearance.

- Demonstrate the use of design elements (architectural form, colour, texture, materiality and detail) to avoid a bulky appearance. It is acknowledged that the elevations show some variation in the appearance of this wall interface, however, it is not apparent that the proposed finishes are sufficient to reduce the bulk.*
- To ensure the podium forms are sufficiently broken down in scale and adequately activate streets and arcades, further clarification is required through the provision of higher scale elevations and part sections for active frontages.*

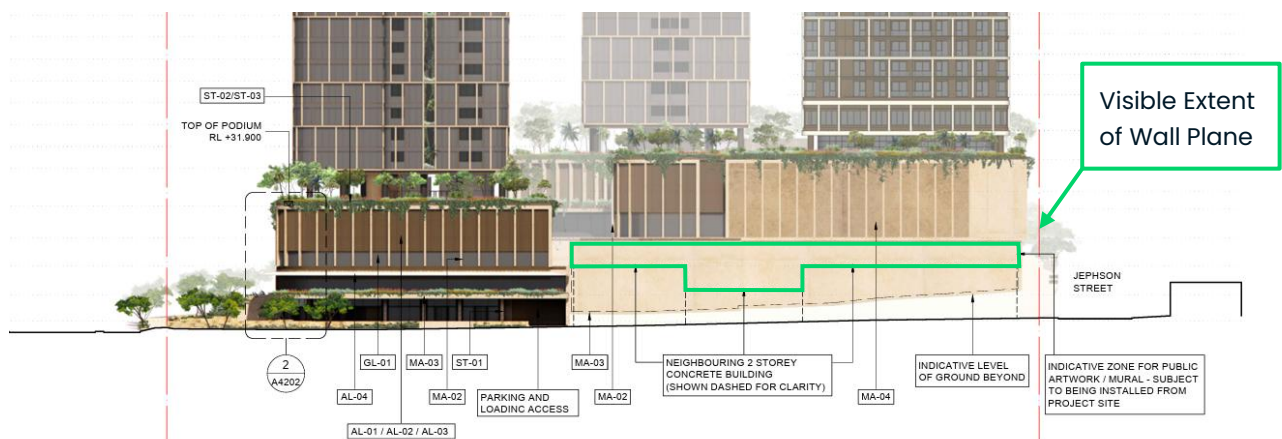
Response

Item 1

In response to **Item 1**, the Applicant has amended the Architectural Drawings to include additional detail on the design elements and finish treatments proposed at the corner of Jephson Street and Sherwood Road. To further support Council's assessment of the podium design, additional drawings illustrating higher scale elevations and sections for active frontages are provided within **Appendix B – Revised Architectural Drawings**.

At the outset, it is noted that the elevation identified by Council does not reflect a realistic representation of the proposed development when viewed from the public realm at Sherwood Street. Having regard to the existing commercial tenancies fronting Sherwood Road, the extent of wall plane visible from Sherwood Road is understood to be limited to the areas outlined in **green** in **Figure 1** below.

Figure 1 – Extract of Revised Site Elevation – North



Source: KHA

Nonetheless, to provide additional visual interest and reduce the perception of bulk, the Applicant and its project team have identified an opportunity to incorporate a combination of artwork and colour finishes to the visible blank wall planes identified above.

On this basis, the Applicant is prepared to accept the imposition of a relevant and reasonable condition of approval, requiring a public artwork strategy to be prepared and submitted to Council prior to commencement of works above ground.

We trust that the above, alongside the attached supporting material, suitably addresses **Item 1** of Council's Further Advice Request.

2.2 Urban Common and Plaza

Item 2

Some further clarification is required with regard to pedestrian movement from the relocated indented bus stop on High Street to the plaza levels and in particular, demonstrating equitable access to the plaza levels. It appears that there is a significant level change between the bus set down area and the plaza level without any direct means of equitable access.

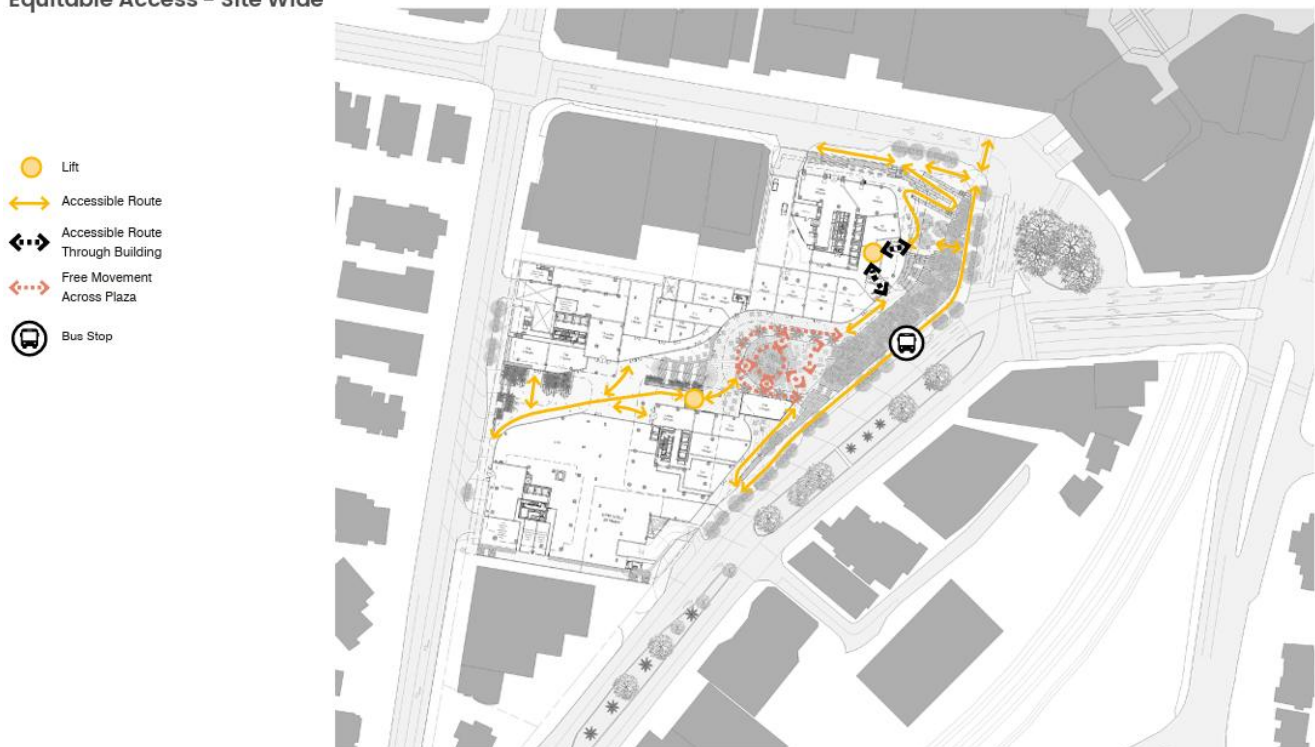
Response

Item 2

In response to **Item 2** of Council's Further Advice Request, *Urbis Ltd* has prepared equitable access plans at two scales as shown in **Figure 2**. This includes a site-wide plan and a more detailed plan demonstrating equitable access between the bus set down area and Central Plaza.

Figure 2 – Equitable Access Plans

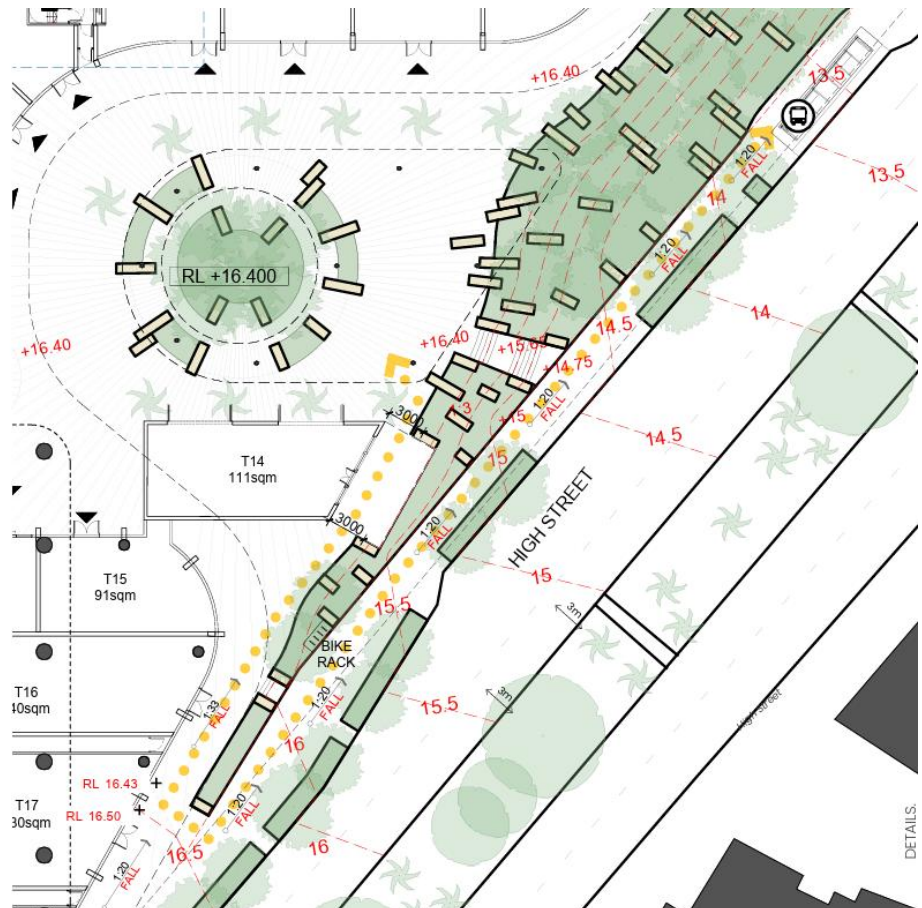
Equitable Access – Site Wide



Picture 1 – Site Wide

Source: Urbis, PWP and HTA

Equitable Access – High Street



Picture 2 – High Street

Source: Urbis, PWP and HTA

Relevantly, to improve equitable outcomes, the landscaping design along High Street has undergone minor revisions to maintain a 3-metre-wide accessway from the proposed bus stop through to the plaza level of the site, utilising existing ramps at appropriate gradients.

For further information, please refer to **Appendix C – Revised Statement of Landscape Design Intent**.

On this basis, we trust that Council's concerns raised in **Item 2** of its Further Advice Request have now been suitably addressed.

2.3 Rooming Accommodation

Item 3

Tower 3 provides for a significant number of studio and twin units across the height of the tower. Whilst the development provides for common facilities for occupants at the podium levels, it is unclear as to whether the space and facilities provided is adequate to ensure the health, safety and amenity of residents as required by PO5 of the Rooming accommodation code.

- a. *Provide a breakdown of the spatial allocation for kitchen and laundry facilities along with the total number of residents intended to occupy the building.*
- b. *Provide additional common kitchen and laundry facilities at other levels throughout the height of tower.*
- c. *Nominate the location for Short term accommodation management offices and mailrooms.*

Response

Item 3

In response to **Item 3(a)** and **Item 3(b)**, the architectural plans have been updated to provide additional detail on the proposed rooming accommodation within Tower 3. The amended plans (as shown in **Figure 3**) confirm that Tower 3 has been designed to accommodate a total of 702 residents and that each studio and two-bedroom unit is provided with an internal kitchenette appropriate to the intended occupancy of the unit.

As outlined in **Table 1**, the proposed kitchen and laundry facilities have been assessed against the relevant requirements of *QDC MP 5.7 – Residential Services Building Standard*. The amended plans demonstrate that the proposed arrangements provide appropriate facilities to support the health, safety and amenity of residents, having regard to the purpose-built student accommodation typology and the combination of private in-room facilities and shared communal facilities available within the building.

Each unit type within Tower 3 is provided with a kitchenette, with indicative dimensions shown on the revised architectural plans (see **Figure 4**). The kitchenette dimensions range from approximately 1.60m to 2.95m in length and are provided within both single-occupancy studio units and two-bed 'two-duo' units. These facilities are complemented by the communal kitchen provided at Level 4, which comprises approximately 43.3m² of gross floor area. This combination of private and communal kitchen facilities provides residents with practical food preparation options within their own units, while also supporting communal use and social interaction at the podium level.

Laundry facilities are also provided at Level 4 within the podium. The dedicated laundry area comprises approximately 65.5m² and includes 48 washer and dryer stacks. This provision has been designed to service the expected resident population of Tower 3 and is conveniently located in conjunction with the broader communal facilities available to residents.

Having regard to this, the proposal demonstrates that Tower 3 satisfies the requirements of **PO5** of the Rooming accommodation code.

In response to **Item 3(c)**, the amended Upper Ground Site Plan also nominates the location of the Tower 3 lobby and mail lockers. Entrance to the lobby and mail lockers is provided adjacent to the Jephson Street drop-off area, providing a legible and convenient point of access for residents, visitors and building management.

Table 1 – Assessment Against QDC Requirements

Facility	QDC Requirement	Proposed Development	Compliance
Kitchen Facilities	a. Where residents prepare their own meals, a kitchen– i. has a minimum floor area of– (A) 0.65m² per person; or (B) where combined with a dining room – 1m² per person; and in any case, not less than 16m²; and ii. has the floor covered with a durable, impervious material finished to a smooth even surface free of cracks and crevices; and iii. has walls and ceilings finished with a durable light coloured impervious material, having a smooth even surface free of cracks and crevices; and iv. has walls behind each stove and cooking appliance ceramic tiled or lined with a smooth impervious material; and v. has food storage facilities and cupboards of 0.06m³ per resident adequate to prevent contamination of food, and cooking or eating utensils, by dirt, dust, flies or the like; and vi. has a space of– (A) for a refrigerator– 50 litres per resident; and (B) for a freezer– 5 litres per resident for the storage of perishable goods; and vii. has a sink with a drainer and reticulated hot and cold water; and viii. has electric or gas stoves and ovens in accordance with the following–	702 residents 43.3m² communal kitchen Each unit is equipped with a kitchenette and burner. The kitchenette dimensions and number of beds for the proposed unit types are summarised below (refer to Figure 4): - Studio Type 1 – 1.66m x 0.6m (1 Bed) - Studio Type 1(B) – 1.6m x 0.625m (1 Bed) - Studio Type 2 – 1.6m x 0.65m (1 bed) - Accessible Studio – 2.95m x 0.62m (1 bed) - Two-dio – 2.676m x 0.66m (2 bed)	Complies Each unit is provided with a private kitchenette, including food preparation and storage facilities appropriate to the intended occupancy. The Level 4 communal kitchen provides an additional 43.3m² of shared kitchen area, supporting resident amenity and supplementing the in-unit facilities. The proposed arrangement satisfies the relevant QDC kitchen facility requirements having regard to the PBSA operating model, where residents have access to both private and communal kitchen facilities.

No. of residents	Ovens	4 burner stoves
1-15	1	1
16-30	1	2
31-45	2	3
46-60	2	4
Over 60	2	4+

1 for each additional 15 residents (or part thereof) over 60

- b. Where a food service is provided, a kitchen complies with the ANZFA National Food Safety Standards 3.1.1; 3.2.2 and 3.2.3.

Laundry Facilities

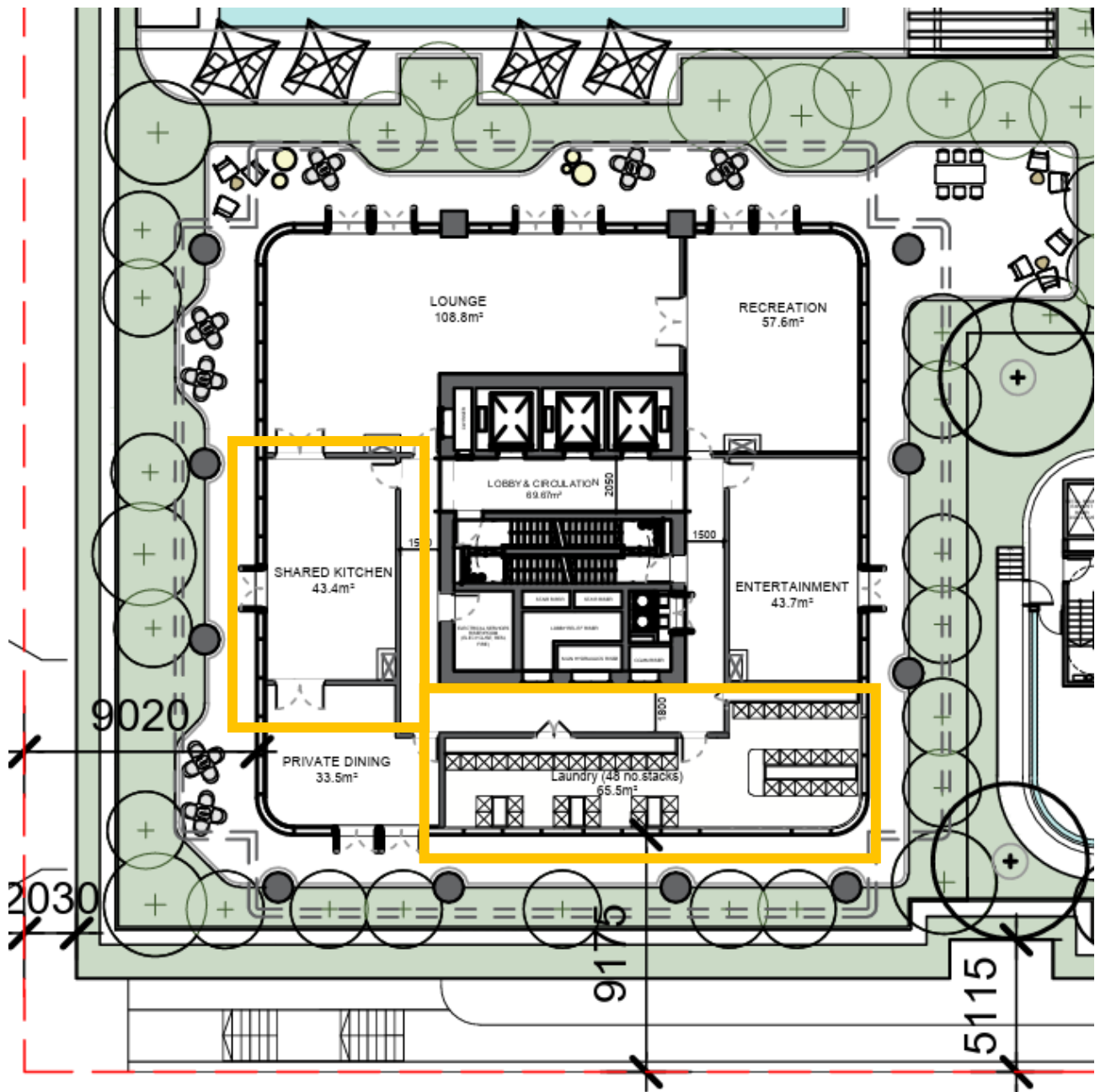
- a. Where residents do their own laundry, a laundry is provided and is equipped with-
- i. one seven (7) kg fully automatic washing machine per 15 residents or part thereof; and
 - ii. one wash trough per 15 residents or part thereof; and
 - iii. clothes drying facilities comprising
 - (A) 7.5m clothes line per resident; or
 - (B) a heat-operated drying cabinet or appliance in the same room as the washing machine; and
 - iv. cold water reticulation to each wash trough; and
 - v. hot and cold water reticulation to each washing machine provided.
- 702 residents
48 machines + dryers

Complies.

The proposal provides 48 washer and dryer stacks within a dedicated 65.5m² laundry at Level 4. This exceeds the QDC benchmark of one washing machine per 15 residents for 702 residents.

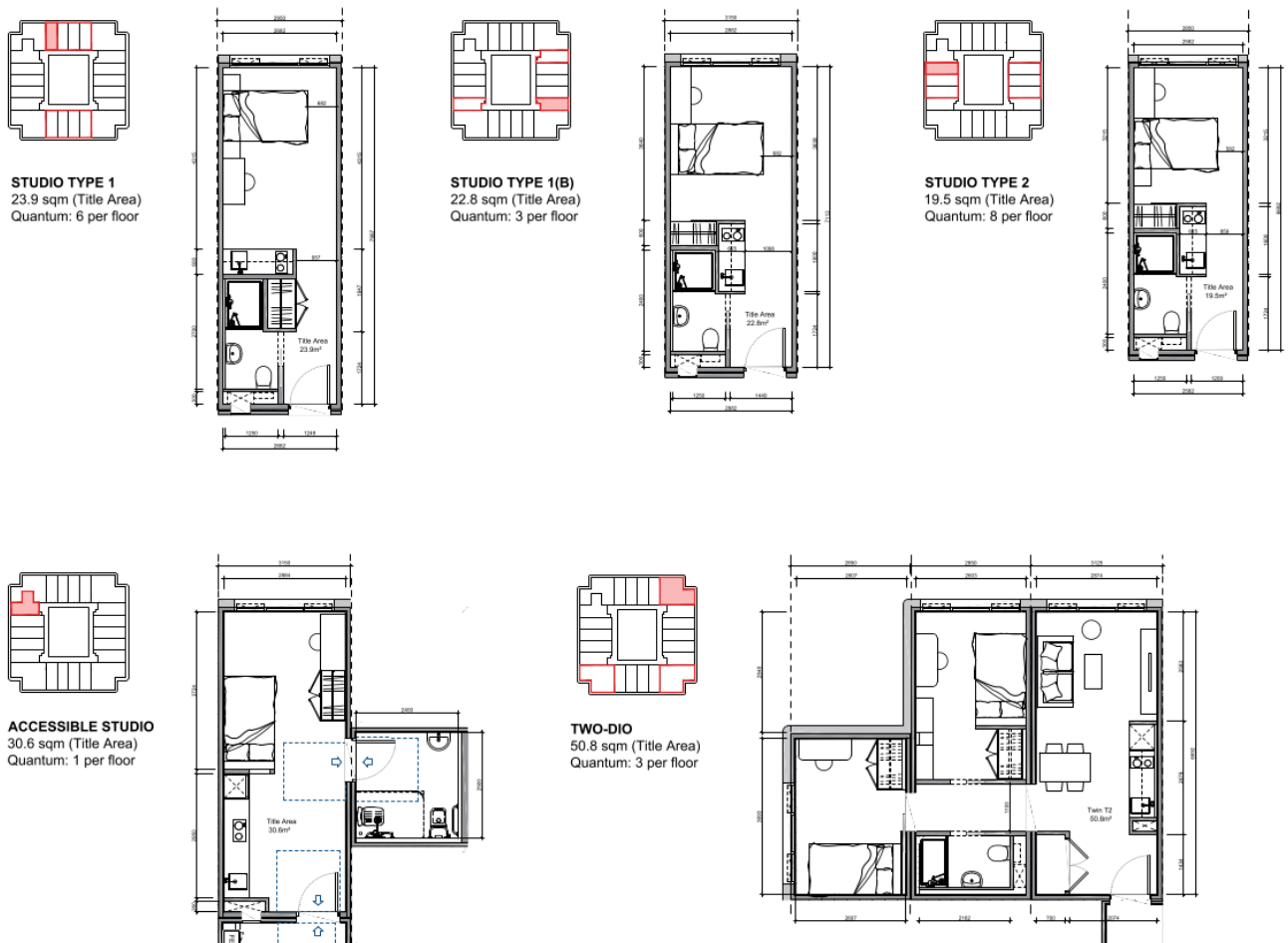
Drying is provided through co-located dryer appliances. The laundry is centrally located with the communal facilities and is appropriately sized to service the intended resident population.

Figure 3 – Tower 3 Level 4 Plan Extract



Source: KHA

Figure 4 – Tower 3 – Typical Unit Layouts



Source: KHA, HTA, and Cottee Parker

We trust that the above suitably addresses Council's concerns raised in **Item 3** of its Further Advice Request.

2.4 Crime Prevention Through Environment Design (CPTED)

Item 4

Towers 2, 3 and 4 lack mail rooms/parcel delivery spaces and management offices. Noting the scale of the development and the likelihood of a significant volume of deliveries being sent to the site, it is important for residents to ensure that these deliveries are managed and secure to limit crimes of opportunity.

- a. Demonstrate that the development will design for crime prevention.*
- b. Provide mail/parcel deliver spaces for all residential towers.*
- c. Provide management spaces for each residential tower aligned with ground level lobby spaces.*

Item 5

The pedestrian arcade at the southern interface of the site is a welcome addition to support movement through Toowong. However, there are concerns that this space may not be well surveyed.

- a. Demonstrate that the arcade has been designed to be safe, welcoming and well surveyed.*

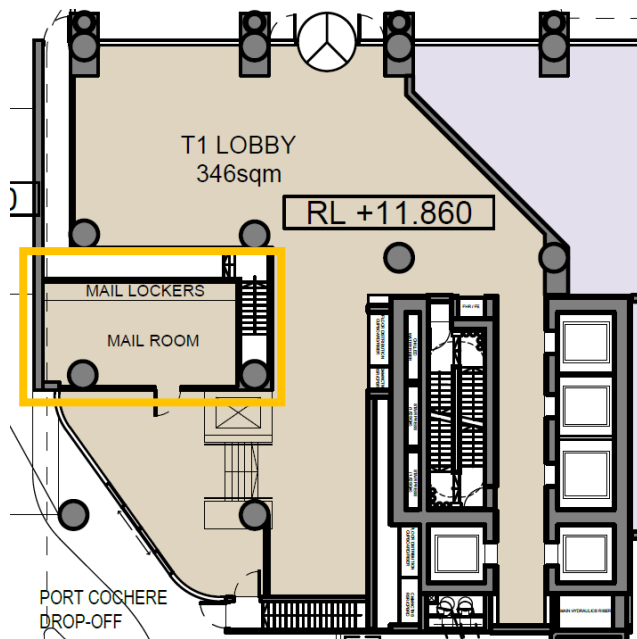
Response

Item 4

In response to **Item 4**, dedicated mail rooms and lockers are provided within the lobby spaces of each Tower, as illustrated in **Figure 5** below and in **Appendix B – Revised Architectural Drawings**.

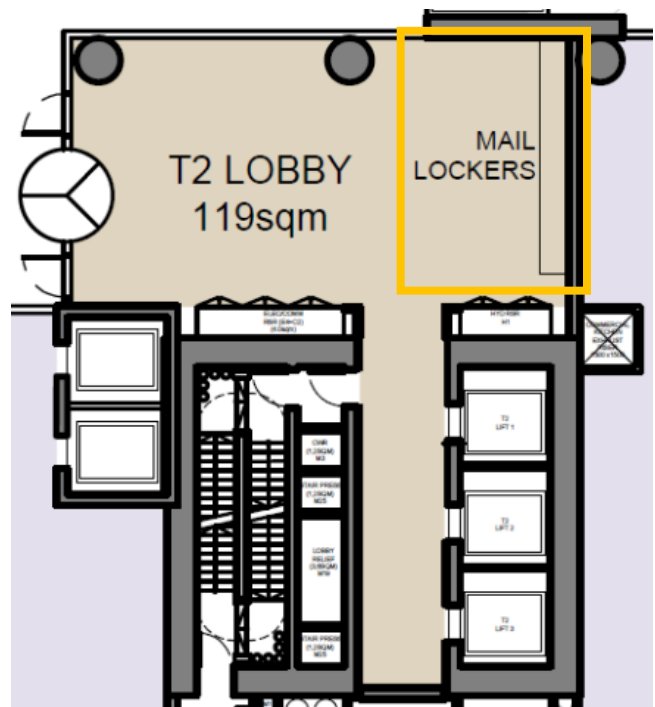
It is noted that the proposed mail room and locker facilities are located within the residential lobby areas, which are access-controlled and available only to residents and authorised persons. The facilities are therefore situated within a secure environment that restricts public access, providing arrangements that minimise opportunities for unauthorised entry, theft and vandalism.

Figure 5 – Mail Rooms and Lockers



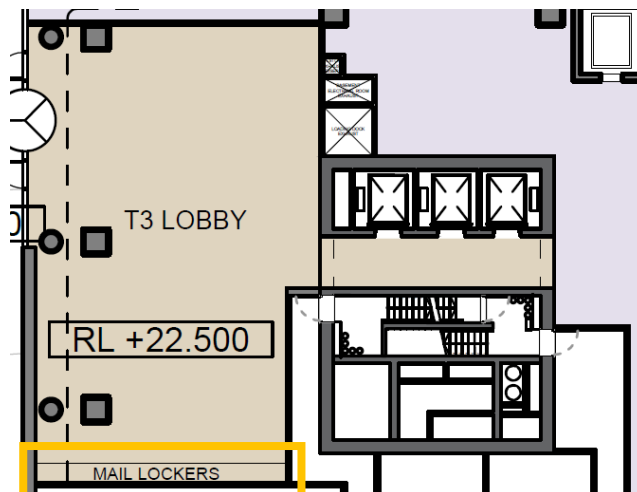
Picture 3 – Tower 1

Source: KHA



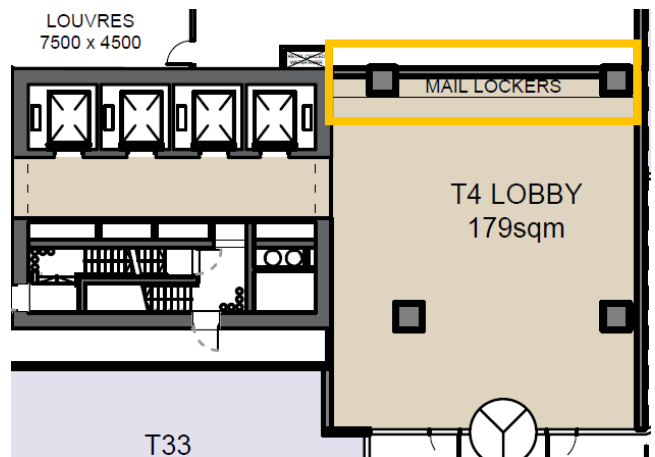
Picture 4 – Tower 2

Source: KHA



Picture 5 – Tower 3

Source: KHA



Picture 6 – Tower 4

Source: KHA

As such, the proposed design appropriately addresses CPTED principles raised in **Item 4**.

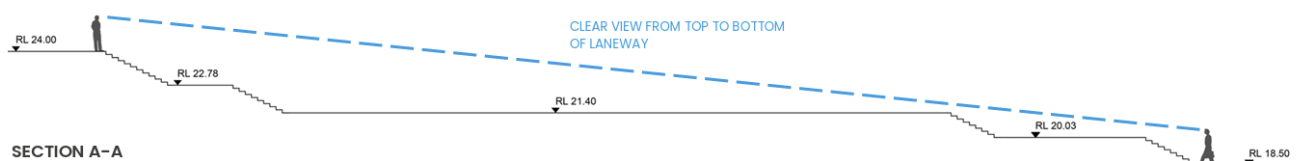
Item 5

In response to **Item 5** of Council's Further Advice Request, an opportunity has been identified to further improve activation and surveillance of the pedestrian arcade at the southern interface of the site. Additional material is included as part of **Appendix C – Revised Statement of Landscape Design Intent** to this response.

Specifically, the design measures implemented are in accordance with Council's CPTED Planning Scheme Policy, and include:

- Identification of 24 hour surveillance opportunities from the gym tenancy above;
- Low level planting to maintain clear visibility of the full extent of the laneway;
- Legibility and identification on lighting provision to maintain pedestrian safety and ambiance within the arcade; and
- Confirmation that a clear view is maintained from the top to bottom of the laneway, achieved via well-considered level changes and stair provision (see **Figure 6**).

Figure 6 – Laneway Sight Line



Source: Urbis, PWP and HTA

We trust that the above suitably addresses Council's concerns raised in **Item 5** of its Further Advice Request.

2.5 Planter Depth

Item 6

The upper ground and podium planters are too narrow and shallow to support the substantial screening vegetation required to effectively screen the podium carparking.

- a. *Increase the depth and width of these planters to accommodate a two-tier planting, consisting of upright screening species and cascading vegetation, to achieve more effective green coverage and visual screening of the podium car park.*

Response

Item 6

In response to **Item 6**, a revised Statement of Landscape Design Intent has been prepared and included as **Appendix C** of this correspondence.

The planter depth on Podium Level 2 has been amended to achieve more effective green coverage and visual screening of the podium car park. As illustrated in **Figure 7** below, edge planters have increased in size

to 1000mm width x 600mm height where possible. This amendment allows for larger shrub planting to be located at the back of the planter, supported by cascading species to the front.

Figure 7 – Revised Level 2 Planters



Source: Urbis, PWP and HTA

The proposed changes achieve an appropriate balance between enhancing the screening of the car parking area, while maintaining adequate openings for natural ventilation, ensuring the ongoing safe functionality and operation of the car park. Notably, further increase to planter depths at the upper levels are constrained by the building's mechanical ventilation requirements.

As such, increased planter depths in response to **Item 6** remain concentrated at the lower levels of the development where they provide the greatest visual benefit and support a meaningful landscape outcome

addressing the public realm. The changes made to Level 2 planters outlined above is understood to have the most significant contribution to streetscape presentation and amenity, while maintaining the operational requirements of the building.

It is highly relevant that no planters are proposed at Level 3. The Level 3 planters shown in the previous Statement of Landscape Design Intent was an administrative error and therefore has been deleted as part of this response.

In this regard, we trust that Council's concerns raised in **Item 6** of its Further Advice Request have now been suitably addressed.

2.6 Site Circulation

Item 7

Although site circulation diagrams have been provided, the legibility of equitable access through the building has not been adequately demonstrated. Equitable public access throughout the site is required 24/7.

- a. *Provide clarification on the legibility, accessibility, and availability of equitable access through the building. Equitable access from the bus stop to the Central plaza is required to be provided. Furthermore, access from the western side of High Street is constrained by the proposed location of the heritage building. The location of buildings and structures should ensure unobstructed circulation and maintain clear sightlines to the Central Plaza when approaching Toowong from the west.*
- b. *Provide amended plan clearly notating the area(s) through site which allow public access 24/7.*

Response

Item 7

As per the response to Item 2, *Urbis Ltd* has prepared updated equitable access plans, included in **Appendix C – Revised Statement of Landscape Design Intent**.

In response to **Item 7**, the revised landscape and access strategy demonstrates that equitable public access is available through the site at all times. As illustrated in the revised access plans, a clear 3-metre-wide pedestrian pathway is maintained along High Street in front of the relocated *Carver and Co.* heritage building. This pathway utilises the existing ramp network at appropriate gradients and provides a legible, direct and accessible route between the proposed bus stop and the Central Plaza.

The equitable access plan demonstrates that pedestrian movement is maintained through the proposed heritage building's terrace area. In this regard, the heritage building is integrated as an active edge to the public realm, providing a prominent visual reference and contribution to the Central Plaza that reinforces a sense of arrival and improves wayfinding outcomes. Moreover, 24/7 public access is available through the site, with the exception of the Tower lift lobbies.

We trust that **Item 7** has been suitably addressed through the provision of amended plans and supporting material, which demonstrate equitable, legible and unrestricted public access through the development.

2.7 Plan Clarity

Item 8

The plans show general overall diagrams of each floor of the building, and the detailed internal layout of the units and short term accommodation is provided on separate plans, which makes it difficult to understand the overall layout of the towers.

- a. *Provide amended plans showing detailed internal layouts altogether for each floor of the buildings.*

Item 9

The hardscape strategy plan is missing a legend.

- a. *Provide amended drawing to include legend.*

Item 10

The written response and amended DA forms mention 5 stages are proposed and this is reflected within the Construction Management Plan, however the main suite of architectural plans appear silent on staging, and the DA Forms do not explain how the land uses are to be applied to each stage.

- a. *Provide amended DA Forms and architectural plans clearly showing the land use and areas/built form proposed within each stage.*

Response

Item 8

In response to **Item 8**, the architectural drawing package has been amended to improve the legibility. The revised drawings, included in **Appendix B – Revised Architectural Drawings**, now consolidate the detailed internal layouts for the residential units and short-term accommodation with the overall floor plate arrangement for each relevant tower level.

On this basis, the amended architectural drawing package suitably addresses **Item 8**.

Item 9

In response to **Item 9** of Council's Further Advice Request, the hardscape strategy plan has been amended to include a legend. The revised drawing is provided in **Appendix C – Revised Statement of Landscape Design Intent**.

The inclusion of the legend clarifies the proposed hardscape materials, surface treatments and public realm elements. Accordingly, we trust that **Item 9** has been suitably addressed.

Item 10

In response to **Item 10**, the Applicant has made the required changes to DA Form 1, included in **Appendix A** to this correspondence. As requested, additional clarity is provided on the proposed staging and land use delivery sequencing.

Notably, car parking provision associated with all land uses is intended to be delivered as part of the Stage 1 works to support the orderly establishment of the site. Further, this approach minimises the disruption to the surrounding road network during the construction phase of the development.

We trust that the above suitably addresses **Item 10** of Council's Further Advice Request.

2.8 Noise

Item 11

The Noise Impact Assessment has been reviewed. The report has not provided sufficient details to demonstrate compliance with the noise criteria in PO1 of the Centre or mixed use code.

- a. *The report has recommended incorporation of acoustic separation and building design measures to ensure that the bar use can comply with the noise criteria in PO1 of the Centre or mixed use code. Please specify the acoustic separation and building design measures required to meet the relevant noise criteria.*
- b. *While no bars are indicated on the plans, this application includes material change of use for bar and as the application has not limited the bar use to specific tenancies, a conservative worst-case scenario is required to be modelled. Provide detailed acoustic modelling of typical bar use noise sources, including crowd and amplified music, and provide forecast noise levels at the nearest sensitive uses or zones, where noise criteria are applicable. Cumulative noise impacts from noise sources on-site are required to be assessed against the relevant criteria, instead of assessing the different noise sources in isolation of each other.*
- c. *A solid canopy is proposed over outdoor dining areas below Tower 4 on Level 4 where seats are located outside the tower footprint. Provide further details on the solid canopy for it to be considered/rated as an acoustic screen.*
- d. *While recommendations have been made for noise control of the gym, the report has not demonstrated that the indoor sport and recreation use can comply with the noise criteria. Provide detailed acoustic modelling of typical gym use noise sources, including free weight impact noise and amplified music, and provide forecast noise levels at nearest sensitive uses or zones where applicable. Also provide the design details of gym floor construction and forecast the audibility of any gym use into sensitive uses within the development.*

Note: Gym use (indoor sport and recreation) is required to be inaudible outside standard hours (EP Act 440W). Insufficiently designed floor impact mitigation has a high risk of limiting the viability of the use. Where gym use is anticipated outside standard hours a specialised floating slab design floor is likely to be required to limit structural noise transmission into sensitive uses within the building.

Response

Item 11

In response to **Item 11**, E-Lab has prepared a Response to Information Request having regard to the matters raised above, which is enclosed within **Appendix D – Acoustic Response** of this correspondence.

The updated assessment responds to each of Council's concerns outlined above. In summary:

- Confirmation is provided that the proposed bar land use is limited to the tenancies considered by the previous response to Council's Further Advice Request. The proposed controls include:
 - Operation hours being limited to 6am to 12am;
 - Façade no less than R_w35 rated glazing (nominally min. 10.38 mm lam with acoustic seals);

- No amplified sounds after 10pm externally; and
- Noise generation internally based on 82dB(A) / 87dB(C) / 92dB(A)_{L_{max}}.

No other area of the development is proposed to include the flexibility in land use to be converted to a bar.

- Cumulative noise impacts were presented in the previous response to Council's Further Advice Request, based on:
 - Indoor noise level of 82dB(A) / 87dB(C) / 92dB(A)_{L_{max}} as per other smaller Food and Drink Outlet tenancies measured, which includes people talking and low-level background music. The ground level areas which have the flexibility to be converted to bar(s) are too small for any major entertainment. Calculations concluded that due to the distance separation, the impacts are calculated to be compliant even with entry door being opened. It is noted, however, that where liquor licensing is required, OLGR may apply stricter limits; and
 - Same ground level areas considered activation potential for the outdoor areas with 100 patrons distributed around the 12 tenancies, noting that the closest tenancies (83dB(A)_{L_{eq}} / 94dB(A)_{L_{max}}) are at 35 meters from closest sensitive receiver (across High Street) and a group of other tenancies are 50 metres from closest sensitive receiver (93dB(A)_{L_{eq,T}} / 102dB(A)_{L_{max}}).

In combination, these potential bars would result in 52dB(A)_{L_{eq,1hr}}/63dB(A)_{L_{max}} which allows the activation of the outdoor areas during day and evening, and reduced periods at night, i.e. overall from 6am to 12am, whilst ensuring no amplified sounds after 10pm externally.
- Confirmation that the proposed solid canopy over outdoor dining below Tower 4 Level 4 must be solid, gap-free construction to achieve 12.5km/m² in order to be considered as an acoustic screen, per Council's definition.
- Further assessment of acoustic impacts and mitigation measures that relate to the proposed indoor sport and recreation tenancy has been undertaken. It was concluded that amenity impacts can be appropriately managed through a combination of well-considered materiality and controlled hours of operation.

Based on the assessment above, we trust that Council's concerns outlined in **Item 11** have been suitably addressed.

2.9 External Traffic Network

Item 12

The updated Transport Engineering Report has addressed several of the concerns raised by Council regarding the impacts of the development on the external road network. However, further information is required to demonstrate the proposed external works and access arrangement. Outstanding areas of concern include the following items and are to be addressed as part of an updated Transport Engineering report Certified by the RPEQ.

- The updated Transport Engineering report states that a standard format road dedication is proposed along the High Street frontage. This conflicts with the submitted architectural plans that indicate a*

volumetric dedication. No concept functional layout has been provided to demonstrate the proposed access arrangement or the indicative pedestrian route.

- i. Provide a scaled and dimensioned concept traffic functional layout that demonstrates the proposed High Street access arrangement that includes the road dedication requirements, pedestrian access arrangements, verge widths and proposed access arrangement.
 - ii. Provide amended architectural plans that demonstrate a standard format dedication, sized to include the verge tie-in on the northern side of the driveway (i.e. not volumetric).
- b. The description of the mitigation of Jephson/Sherwood Streets in the Transport Engineer report body is inconsistent with what is shown on drawing 24BRT547-12. It is Council's understanding that the only works that are to be undertaken as part of the mitigation of Jephson/Sherwood Streets is the extension of the peak period No Stopping restrictions on the western leg, consistent with Condition 54 of the previous approval A005894666.
 - i. If a change to the proposed mitigation of Jephson/Sherwood Streets is proposed, the changed scenario should be demonstrated in the traffic modelling given the increase in the scale of this development compared to the previous approval.
- c. The updated Transport Engineering Report states that the Jephson Street indented passenger loading zone has been updated to provide geometry and standard format land dedication. However, the submitted plans contain inconsistent information regarding the proposed dedication and loading zone arrangement with the architectural plans showing a volumetric dedication rather than standard format and the Colliers plan 24BRT0547-07 Rev D shows original geometric arrangement. Further information and consistent proposed plans of the indented passenger loading zone are required to demonstrate the proposed design and road dedication requirements.
 - i. Amended the proposed architectural plans to demonstrate a standard format land dedication and remove references to volumetric dedication.
 - ii. Provide a scaled and dimensioned concept traffic functional layout for the proposed pavement indent.

Item 13

It is stated in the Transport Engineering report that the raised islands within Jephson St can be provided as part of the site works. This has not been demonstrated and the overall proposal for the road reserve area that will contain the raised island is unclear.

- a. Provide a scaled and dimensioned concept traffic functional layout that demonstrates how the Jephson St raised median island is to be implemented within the road reserve.
- b. If the Patterson's Folly pedestrian improvements at the High Street/Ebor Street signals are still proposed as part of the external road works, the changes are to be supported by appropriate supporting evidence so that the proposal can be assessed in full.
- c. Provide Concept functional layouts (supported by design vehicle swept paths) for the proposed intersection upgrade, and an Impact assessment of the proposed changes to the area.

Response

Item 12

The architectural plans and supporting material have been updated to address each component of **Item 12**. The relevant amendments are detailed below and are reflected in **Appendix B – Revised Architectural Drawings**, prepared by *KHA, HTA and Cottee Parker* and in **Appendix E – Traffic Advice**, prepared by *Colliers*.

- In response to **Item 12(a)(i)**, *Colliers* have prepared a scaled and dimensioned concept functional layout for the High Street frontage. The proposed High Street access arrangement includes a left-in-only site access, associated short auxiliary left-turn lane, a road dedication area, pedestrian access arrangements and the proposed verge treatment.

As indicated by the concept layout, the High Street access is proposed as a modified Type B2 crossover for light vehicles only, with the access positioned to minimise interaction with through traffic. Importantly, this layout maintains the pedestrian connection along the High Street frontage and integrates the access with the proposed development streetscape and future bus stop.

In response to **Item 12(a)(ii)**, the architectural plans have been revised to remove the volumetric dedication arrangement and demonstrate a standard format road dedication along the High Street frontage. As the proposal no longer requires the basement to extend beneath the road reserve, the revised arrangement is dedicated in full. Moreover, the dedication incorporates the required verge tie-in on the northern side of the driveway and maintains the proposed pedestrian connection along High Street.

- In response to **Item 12(b)(i)**, *Colliers* confirm that the ‘No Stopping’ restrictions proposed on the western leg of Sherwood Road are appropriate external works measures, consistent with the previous approval arrangement. This restriction has been extended to the eastern leg of Sherwood Road. The proposed restriction timeframes cover both the AM and PM, from 6am to 9am and 3pm to 6pm.

The updated traffic modelling demonstrated that, with the proposed mitigation measures in place, the intersection and surrounding network can accommodate the additional development traffic demands and improve intersection performance when compared with the corresponding unmitigated development scenario.

- In response to **Item 12(c)(i)**, the architectural plans have been amended to demonstrate a standard-format land dedication associated with the proposed Jephson Street passenger loading zone and remove references to the previous volumetric dedication arrangement. The revised arrangement maintains the required verge width past the indent and provides three (3) short-term loading/est-down positions.

In response to **Item 12(c)(ii)**, the architectural and traffic plans have been revised to provide scaled and dimensioned concept traffic functional layouts for the proposed pavement indent.

We trust that this information fully addresses and resolves **Item 12** of Council’s Further Advice Request.

Item 13

In response to each component of **Item 13**, the architectural plans and supporting material have been revised. The relevant amendments are detailed below and are reflected in **Appendix B – Revised**

Architectural Drawings, prepared by *KHA, HTA and Cottee Parker* and in **Appendix E – Traffic Advice**, prepared by *Colliers*.

- In response to **Item 13(a)**, a scaled and dimensioned concept layout demonstrating the proposed median treatment is provided in the revised architectural drawings in **Appendix B** and traffic engineering drawings (Drawing No. 24BRT0547_13) provided at **Appendix E**. The revised concept provides for the continuation of the raised median island within Jephson Street road reserve. This will extend to approximately 10m south of the southern extent of the site frontage to Jephson Street.

The median extension is intended to physically prevent right-turn movements into the proposed left-in/left-out site access and reinforce the intended access operation. It is noted that the proposed median treatment and associated roadworks remain subject to approval by the relevant road authority and confirmation as part of detailed design phase.

In response to **Item 13(b)** and **(c)**, *Colliers* confirm that the current application and the associated external traffic works do not propose any works associated with the Patterson's Folly pedestrian improvements at the High Street/Ebor Street intersection.

We trust that this information fully addresses and resolves **Item 13** of Council's Further Advice Request.

2.10 Car Parking Supply

Item 14

The submitted Transport Engineering Report contains inconsistencies regarding the proposed car parking provision rates. Table 5-1: TAPS PSP Car Parking Supply Requirement states the required and provided car parking rates for the proposed development. The provision rates in this table conflict with the provision rates outlined in section 5.1.3 Table 5-2: Proposed Car Parking Supply states that 332 spaces will be reserved for commercial use.

- Provide an amended RPEQ-certified Traffic Engineering Report that clearly identifies the required and proposed car parking provision for each land use and demonstrates how the proposed car parking allocation complies with and achieves the outcomes of the TAPS code.*

Item 15

It is advised that a percentage of the car parking spaces may be considered small car parking spaces due to constraints such as column spacing. Provide the expected percentage of small car parking spaces that may occur on the site, in accordance with section 7.8.1 of the TAPS PSP.

Response

Item 14

In response to **Item 14**, *Colliers* have prepared a formal response included in **Appendix E – Traffic Advice**, which outlines the required and proposed car parking provisions for the development. Key findings of the assessment is summarised in **Table 1** below.

Table 2 – Revised Parking Assessment

Land Use / Component	Extent	TAPS Requirement	Provision
Multiple Dwellings – Residential			
Multiple Dwelling (Tower 1)	269 units (total)	286 spaces (total)	286 spaces (total)
Multiple Dwelling (Tower 2)	249 units (total)	272 spaces (total)	272 spaces (total)
Multiple Dwelling (Visitors)	518 units	78 spaces	78 spaces
Purpose Built Student Accommodation (PBSA)			
Student Accommodation (PBSA)	702 Beds / 594 Units	281 spaces (min)	105 spaces
Build to Rent (BTR)			
BTR – Residents	341 units (total)	319 spaces (total)	102 spaces (total)
BTR – Visitors	341 units	51 spaces	51 spaces
Retail			
Retail	16,587m ²	166 spaces (max)	332 spaces (max)
Total		1453 spaces	1424 spaces

The proposed development therefore provides a total of 1,424 car parking spaces, which is generally consistent with the combined TAPS benchmark of 1,453 spaces. The resulting difference of 29 spaces is minor in the context of the overall parking supply and should be considered having regard to the fact that the proposed development complies with car parking requirements for the multiple dwelling components. Where reduced car parking rates are proposed, these apply to land uses that do not historically generate high demand for car usage, such as Build to Rent and Purpose Built Student Accommodation.

Further justification on the suitability of this approach is provided in **Appendix E – Traffic Response**.

Based on the assessment above, we trust that Council's concerns outlined in **Item 14** have been suitably addressed.

Item 15

Colliers have prepared a formal response to **Item 15**, provided herewith as **Appendix E – Traffic Advice** to this correspondence.

The response confirms that the proposed parking arrangement for Towers 1 and 2 includes 7 small car parking spaces out of the 518 residential parking spaces provided, representing approximately 1.4% of the

total residential parking supply. This percentage is notably below the 20% maximum small car parking provision identified in Section 7.8.1 of the TAPS PSP.

We trust that this information fully addresses and resolves **Item 15** of Council's Further Advice Request.

2.11 Internal Traffic Layout

Item 16

Table 7-1: TAPS PSP Service Vehicle Requirements of the Transport Engineering Report proposes the necessary provisions for service vehicles across the proposed use types for the site. The provision rates do not adequately demonstrate that the proposed servicing provisions are sufficient for the scale and arrangement of the development. The servicing assessment considers the multiple dwelling towers as a single use and does not adequately consider the servicing demands of each tower independently in regard to minimum services requirements.

- a. *Provide an amended RPEQ-certified Traffic Engineering Assessment that reviews the servicing requirements of the development which treats each multiple dwelling tower as an individual development use and demonstrates that sufficient servicing facilities are provided for all proposed uses in accordance with PO18 of the TAPS code.*
- b. *Demonstrate that the proposed servicing areas associated with Towers 1 and 3 provide safe, efficient and functional access for the servicing operations can occur without adverse impacts on site circulation, vehicle manoeuvring or pedestrian safety.*

Response

Item 16

In response to **Item 16(a)**, an amended RPEQ-certified Traffic Engineering Assessment has been prepared by Colliers and is included as **Appendix E – Traffic Engineering Advice**.

The amended assessment reviews the servicing requirements for each tower individually, having regard to Performance Outcome PO18 of the TAPS Code, which states the following:

PO18

Development is serviced by an adequate number and size of service vehicles.

The corresponding Acceptable Outcome AO18 of the Taps code states:

AO18

Development ensures that the number and size of design service vehicles selected for the site is in compliance with the standards in the Transport, access, parking and servicing planning scheme policy.

The assessment confirms that each tower is provided with appropriate servicing infrastructure to accommodate its anticipated operational demands.

Tower 1 is serviced by dedicated van, SRV and shared RCV/HRV facilities.

Towers 2, 3 and 4 are serviced via the Jephson Street loading dock, which provides a combination of van, SRV, MRV, HRV and shared RCV/HRV bays capable of accommodating the servicing requirements associated with residential, BTR and PBSA uses, including furniture deliveries, removals, parcel deliveries, maintenance and waste collection activities.

The assessment further concludes that the shared servicing arrangement for Towers 2, 3 and 4 is appropriate given the differing servicing profiles and timing of activities across the uses. A Loading Dock Management Plan and on-site dock management are recommended to coordinate deliveries, allocate loading bays and minimise conflicts between servicing activities. The assessment demonstrates that the loading facilities provide substantial operational flexibility and sufficient capacity to accommodate anticipated servicing demand.

Accordingly, the amended assessment confirms that the proposed development provides an adequate number and size of servicing facilities for each tower individually and collectively, consistent with PO18 and AO18 of the TAPS Code.

In response to **Item 16(b)**, Colliers have prepared amended swept path assessments, provided at **Appendix E – Traffic Engineering Advice**. The assessments demonstrate that the nominated service vehicles can access and manoeuvre through the servicing areas, while maintaining the required clearances. The servicing areas have been arranged as a coordinated servicing network, comprising a primary service area accessed from Jephson Street, which accommodates larger service vehicles, and the Sherwood Road servicing area, which provides additional loading capacity.

This arrangement allows servicing associated with Towers 2, 3, and 4, and common uses to be accommodated through shared facilities, subject to coordinated loading dock and service vehicle management. The servicing strategy is therefore considered capable of accommodating the anticipated demand without adversely impacting site circulation, vehicle manoeuvring or pedestrian safety.

2.12 Pedestrian Site Access

Item 17

The proposed relocation of the heritage building creates unequitable access and circulation within the common plaza by introducing pedestrian and cyclist pinch points. The location of heritage building and pedestrians/cyclist flow from the public realm into the site should be reconsidered to provide access to the site that meets the requirements of PO7 and PO8 of the TAPS code.

Response

Item 17

As outlined in the response to Items 2 and 7, *Urbis Ltd* has prepared updated equitable access plans, included within **Appendix C – Revised Statement of Landscape Design Intent**. These plans comprise both a site-wide equitable access strategy and a detailed plan demonstrating accessible movement between the proposed bus set-down area and the Central Plaza.

In response to Council's concerns regarding pedestrian and cyclist pinch points associated with the relocated heritage building, the landscape design along High Street has undergone targeted revisions to

improve circulation and accessibility outcomes. The revised design maintains a continuous 3-metre-wide accessible pathway between the proposed bus stop and the plaza. The revised arrangement modifies the terrace area adjoining the heritage building to remove pinch points within the pedestrian network.

A revised cyclist access plan has also been included within **Appendix C** (refer to **Figure 8**). The plan clearly identifies cyclist access routes to outdoor bicycle parking areas and internal secure bicycle storage facilities.

Bike racks have been strategically located at key activity nodes, including the Central Plaza, to support convenient and legible cyclist access throughout the site. As demonstrated within the equitable access plans at **Figure 9** and **Appendix C**, bicycle parking is positioned adjacent to accessible movement corridors, supporting safe and efficient integration of active transport infrastructure into the public realm.

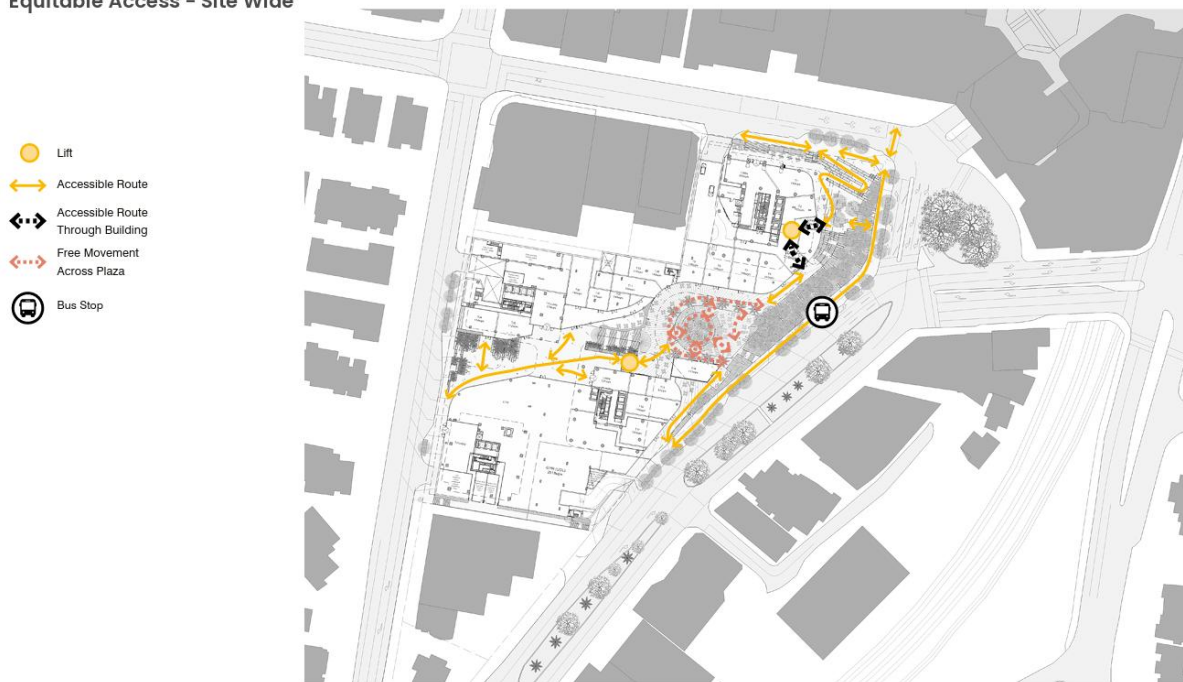
Figure 8 – Cyclist Access Plan

Cyclist Access



Source: PWP, Urbis, + HTA

Figure 9 – Equitable Access Plan
Equitable Access – Site Wide



Source: PWP, Urbis, and HTA

Collectively, the revised access arrangements provide a clear, safe and equitable movement network that improves pedestrian and cyclist connectivity between the surrounding public realm and the development. The proposal therefore satisfies the intent and outcomes sought by PO7 and PO8 of the Transport, Access, Parking and Servicing (TAPS) Code.

2.13 Residential Bin Collection

Item 18

Provide amended architectural plans which clearly demonstrates the area (m^2) and internal dimensions of the Lower Ground 'Bin Room (Residential)'.

Item 19

The internal width of the Ground Floor 'Bins Residential (T2 & T4)' room is required to be increased to enable functional and efficient manoeuvring of bins, including their rotation around the internal structural supporting columns during servicing. This, provide amended architectural plans which clearly demonstrates the 'Bin Residential (T2 & T4)' has been provided with a minimum area of $117.8m^2$ (internal dimensions of 13.02m wide x 9m deep).

Item 20

Additionally, provide a secondary roller door to the east of the proposed roller door to enable functional manoeuvring of bins. This is required due to the location of the structural supporting columns, which restrict bin movements within the bin room.

Item 21

A separate 'Bins PBSA (T3) presentation room has been provided on the 'Ground Floor'. However, the internal width of the bin room does not enable functional manoeuvring of bins.

- a. Provide amended architectural plans to demonstrate that the 'PBSA Bin Room' has been increased in width to facilitate functional manoeuvring of bins during servicing. Demonstrate the 'PBSA Bin Room' has been provided with a minimum area of 48.78m² (internal dimensions of 5.42m wide x 9m deep).

Response

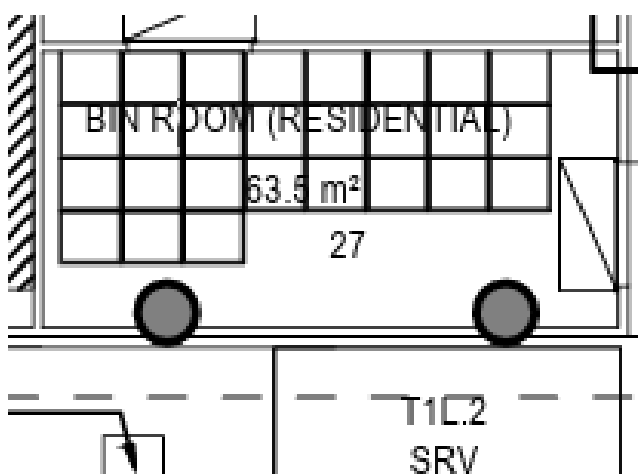
Colliers have prepared a formal response to address the matters raised by Council relating to Waste Management, provided within **Appendix F – Waste Management Response** to this correspondence. For completeness, a summary of the response to each of the items raised above is provided below.

Item 18

In response to **Item 18**, the architectural plans have been amended to accurately capture and annotate the relevant GFA (m²) associated with the Lower Ground 'Bin Room (Residential)', illustrated in **Figure 10** below.

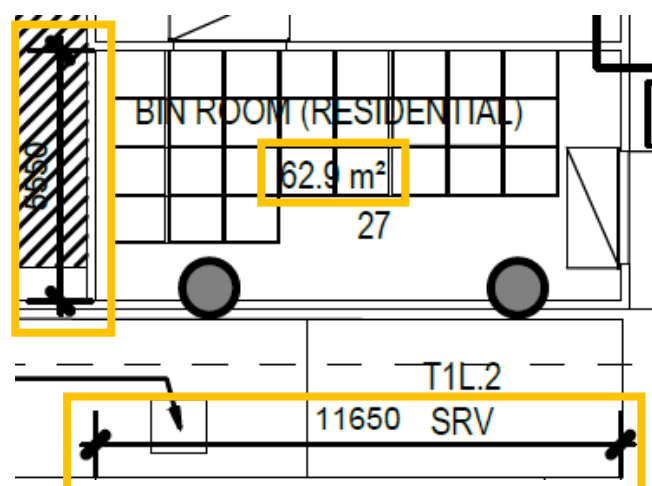
For completeness, **Appendix B – Revised Architectural Drawings** of this correspondence also include annotations to the residential bin rooms located in Basement 1.

Figure 10 – Lower Ground Bin Room



Picture 7 – As Lodged Architectural Drawings

Source: KHA



Picture 8 – Revised Architectural Drawings

Source: KHA

Item 19

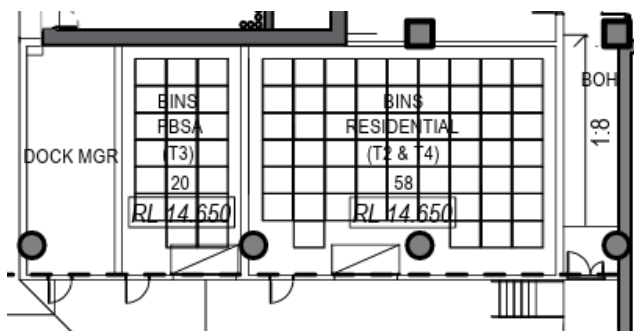
Colliers considers that the requested minimum area of 117.8m² and internal dimensions of 13.02m wide x 9m deep are not required to achieve functional and efficient bin servicing, having regard to the additional access provided by the secondary roller door (in response to **Item 20** of Council's Further Advice), and the available space immediately outside the bin room for temporary bin positioning and manoeuvring.

Specifically, the 35m² space available immediately outside the Ground Floor 'Bins Residential (T2 & T4)' room allows for the temporary positioning of bins and facilitates ease of rotation and manoeuvring during servicing operations. This arrangement further maintains sufficient aisle width to allow operators and other personnel to safely and efficiently move around the bins during servicing, providing additional flexibility for servicing the room and maintaining an efficient bin transfer route.

Item 20

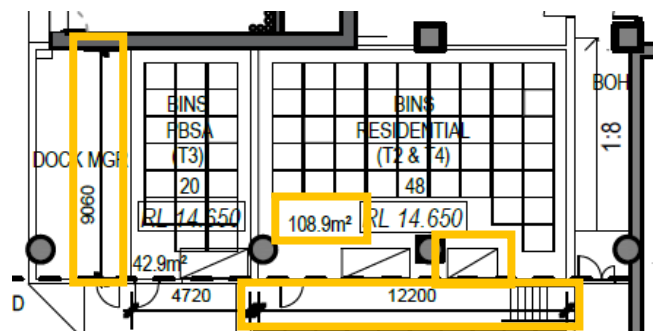
In response to **Item 20**, the architectural plans have been amended to introduce a secondary roller door (see **Figure 11**) to improve access to the bin room and facilitate easier movement and servicing of bins around the internal structural columns.

Figure 11 – Ground Floor 'Bins Residential (T2 & T4)'



Picture 9 – As Lodged Architectural Drawings

Source: KHA



Picture 10 – Revised Architectural Drawings

Source: KHA

Item 21

In response to **Item 21**, Colliers maintains that the space of 35m² available immediately outside the 'PBSA (T3) Bin Room' is suitable to accommodate temporary position bins and facilitate ease of rotation and manoeuvring during service operations, as outlined in the Applicant's response to **Item 20** above.

This arrangement continues to maintain sufficient aisle width to allow operators and other personnel to safely and efficiently move around the bins during servicing and assists in maintaining an efficient bin transfer route.

Having regard to the above, we trust that the Applicant has suitably responded to **Items 18 to 21** of Council's Further Advice.

2.14 Non-residential Bin Collection

Item 22

Provide amended plans annotating the area (m²) and internal dimensions on the architectural plans.

Item 23

Demonstrate the storage location and include an annotation stipulating “up-right bin press 3:1 compaction ratio for general refuse, paper and cardboard” within the ‘Bins (Retail)’ bin room.

Item 24

It is acknowledged that the ‘Supermarket uses’ have adopted reduction technology by means of an up-right bin press (3:1 compaction ratio) for general refuse and inclusion of ‘static compactor (30m²) with a 5:1 compaction ratio for cardboard’. Provide amended architectural plans addressing the following:

- a. Clearly demonstrate the storage location and include an annotation stipulating ‘up-right bin-press (3:1 Compaction ratio) for general refuse’ within the ‘Bins (Supermarket)’ bin room.*
- b. Demonstrate the size (length, width, height) of the ‘Supermarket RORO’ on a revised ‘Ground Site Plan’ and include an annotation which stipulates ‘Static Compactor compaction ratio of 5:1 for paper & cardboard’.*

Item 25

Servicing of bins from the ‘Bins (Retail)’ and the ‘Bins PBSA (T3)’ results in bins manoeuvring across a floor level with a gradient which exceeds 1:20 (1:16).

- a. Amend the architectural plans to demonstrate a maximum bin transfer gradient of 1:20 from both the ‘Bins (Retail)’ and the ‘Bins PBSA (T3)’ to the rear of the RCV loading and servicing position.*

Response

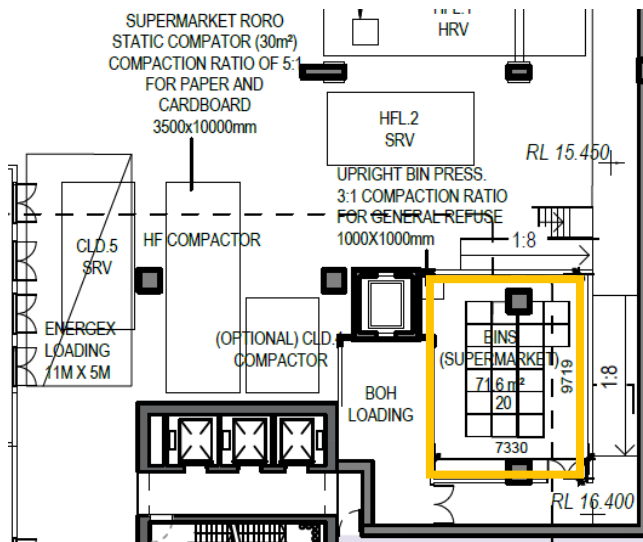
Colliers have prepared a formal response to address the matters raised by Council relating to Waste Management, provided within **Appendix F – Waste Management Response** to this correspondence.

For completeness, a summary of the response to each of the items raised above is provided below.

Item 22

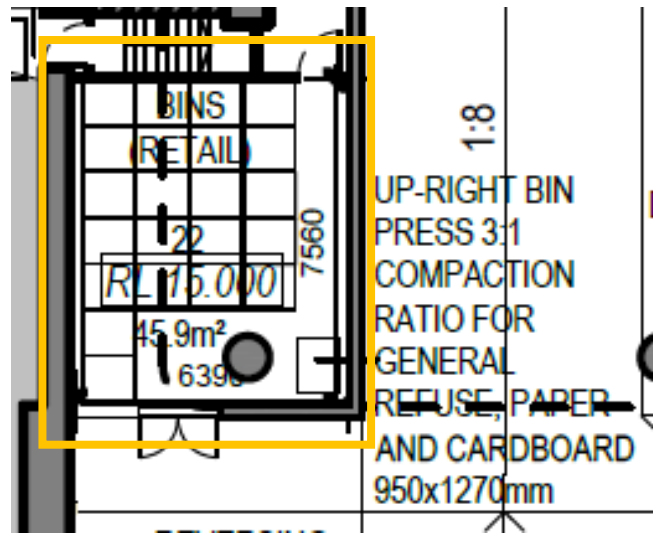
A series of administrative annotations are made to the Architectural Drawings (refer to **Appendix B – Revised Architectural Drawings**) in response to **Item 22** of Council’s Further Advice Request. This includes the inclusion of area (m²) and dimensions of non-residential bin collection areas, as illustrated in **Figure 12** below.

Figure 12 – Annotated Non-Residential Bin Collection



Picture 11 – Supermarket Bins

Source: KHA



Picture 12 – Retail Bins

Source: KHA

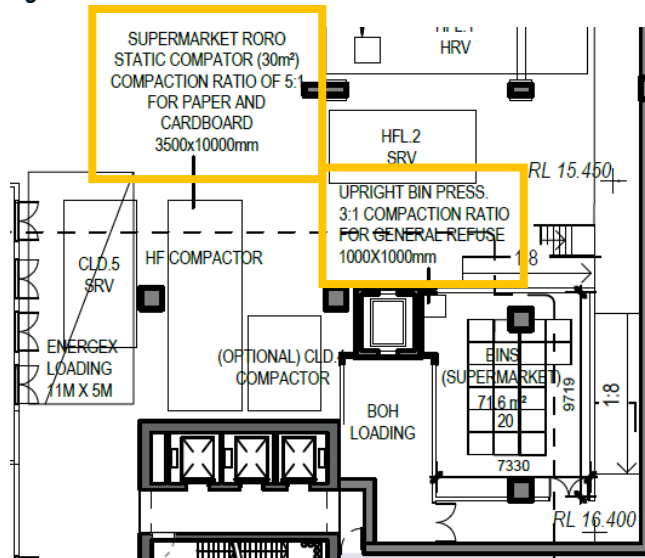
Item 23 and Item 24

In response to **Item 23** and **Item 24**, Colliers confirms that adequate storage is available for the upright bin press within the 'Bins (Retail)' room and the 'Bins (Supermarket)' rooms.

As outlined in **Figure 13** below, the architectural plans have been amended to demonstrate:

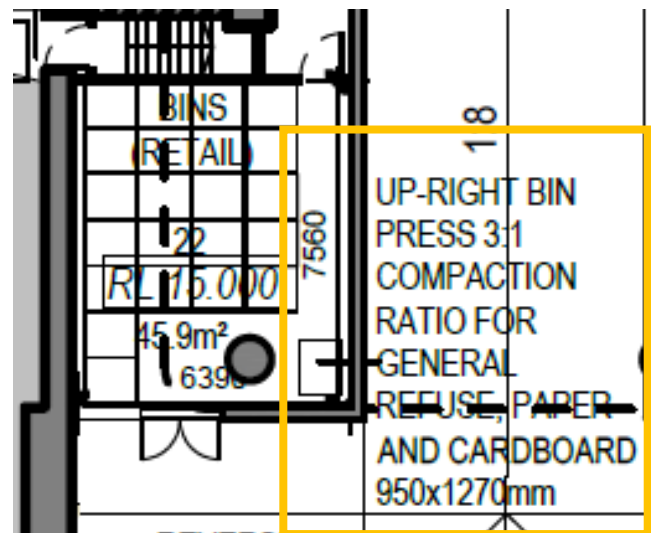
- The location of the upright bin press and its 3:1 compaction ratio for general refuse, paper and cardboard within the 'Bins (Retail)' area; and
- The location of the upright bin press within the 'Bins (Supermarket)' area, noting the 3:1 compaction ratio for general refuse; and
- The dimensions of the Supermarket RORO, identifying the static compactor and its 5:1 compaction ratio for paper and cardboard.

Figure 13 – Annotated Non-Residential Bin Collection



Picture 13 – Supermarket Bins

Source: KHA



Picture 14 – Retail Bins

Source: KHA

Item 25

In response to **Item 25**, the architectural plans have been amended to demonstrate a maximum bin transfer gradient of approximately 1:22 from both the 'Bins (Retail)' and 'Bins PBSA (T3)' bin rooms through to the rear of the RCV loading and servicing position.

Refer to **Appendix B – Revised Architectural Drawings** for further detail.

We trust that the above has suitably responded to **Items 22 to 25** of Council's Further Advice.

2.15 RCV Swept Path Analysis

Item 26

A RPEQ certified swept path analysis has been provided which demonstrates the RCV enters the 'TIL.1 HRV/ RCV' loading bay in a forward gear. However, the forward in RCV manoeuvre results in the SRV blocking bin transfer and an excessive transfer distance for bins.

- Submit a revised RPEQ certified swept path analysis for a 10.24m Rear Loading RCV (As per BSD-3008-2) which demonstrates the RCV enters the 'TIL.1 HRV / RCV' loading bay in reverse gear, whilst utilising a lock-to-lock time of 6.00s and curb-to-curb turning radius of 9.757m.

Item 27

The TIA Report includes a RPEQ certified swept path analysis for 12.5m HRV being the larger vehicle in lieu of providing an RCV certified swept path. However, the 'HRV – Forward Out' manoeuvre from 'CLD.1 HRV/ RCV' loading bay results in the HRV clearance envelope conflicting with the 'Bin (Retail)' room.

- b. Submit a revised RPEQ certified swept path analysis for a 12.5m HRV which demonstrates the 'Forward Out' manoeuvre from 'CLD.1 HRV/RCV' loading bay does not conflict with the built form.

Item 28

The supermarket waste solution requires the use of a static compactor bin which will be collected by a 'Hook Lift Truck'. However, the TIA Report does not include a swept path analysis for the servicing of this bin.

- a. Provide a RPEQ certified swept path analysis for the proposed dual steer and dual rear wheel 'Hook Lift Truck' which demonstrates safe and efficient servicing of the supermarket's static compactor bin.
- b. Ensure the swept path includes the vehicle specifications (i.e., length, width, track, operational height, lock-to-lock time, curb-to-curb turning radius etc).

Response

Item 26, Item 27 and Item 28

In response to **Item 26**, **Item 27** and **Item 28**, Colliers have prepared a suite of RPEQ certified swept path analyses, included as Appendix B within the Traffic Engineering Response.

For further information, please refer to **Appendix E**.

We trust that Council's concerns outlined in **Item 16**, **Item 27** and **Item 28** are suitably addressed with the provision of these technical drawings.

2.16 Flooding

Item 29

The submitted Site Based Stormwater Management and Engineering Services report proposes a minimum basement level of 11.46 metres AHD based on an Overland flow Assessment Report that was completed in 2019 by Stormwater Consulting. Council does not support reliance on historical flood assessments that do not form part of the current development application.

- a. To demonstrate compliance with PO5 and PO7 of the Flood overlay code, submit an amended RPEQ-certified Site Based Stormwater Management and Engineering Services Report that includes the latest available flood modelling and demonstrates the proposed development achieves the required flood planning levels. Flood modelling information for the site can be obtained via Council website using the Open Data Portal.
- b. Due to the existing overland flow flooding affecting the Sherwood Road frontage of the site, demonstrate that the proposed development achieves the minimum flood planning levels prescribed in Table 9.4.9.3.C of the Flood overlay code.
- c. In accordance with Table 9.4.9.3.C of the Flood overlay code, demonstrate that the basement car parking entry achieves a minimum flood planning level of the 2% AEP flood event + 300 mm and maintains no opening to the basement below the required level.
- d. A minimum of level of 11.66m AHD for the basement opening and 11.80m AHD for building floor levels is expected for the minimum flood immunity levels.
- e. The use of flood gates is not supported by Council. Given the site is impacted by overland flow flooding (which is characterised by limited warning times) reliance on active flood mitigation measures is not

an acceptable outcome. Remove the proposed flood gates and redesign the basement entry point as required to achieve the minimum flood planning levels.

Response

Item 29

ADG Engineers has prepared a Flood Engineering Response and updated the Engineering Report, in response to **Item 29**. A copy has been enclosed within **Appendix G** to this response. Detailed flood modelling based on the latest available flood data is currently being prepared by *WEP Consulting* to support the proposed flood planning levels. This will be submitted to Council separately.

In summary:

- In response to **Item 29(a)**, the Engineering Report has been updated to demonstrate the proposed development achieves compliance with the required flood planning levels.
- In response to **Item 29(b)**, the entry level and finished floor levels have been revised to achieve the required flood planning levels. For further information, please refer to the Revised Architectural Drawings enclosed within **Appendix B**.
- In response to **Item 29(c)**, it is confirmed that the minimum flood planning level for the proposed basement car park entry has been adopted as RL 11.66m AHD, having regard to the mapped overland flow level of RL 11.36m AHD for the 2% AEP event plus 300mm freeboard. The proposed entry level has been increased to RL 11.66m AHD, to achieve compliance with the minimum flood planning requirement. Relevantly, no openings are proposed below this level.
- In response to **Item 29(d)**, the design has been amended to ensure compliance with PO5 and PO7 of the Flood Overlay Code. As demonstrated in the Revised Architectural Drawings (**Appendix B**), the basement opening level is set to RL 11.66m AHD and the building finished floor level is set at RL 11.86m AHD.

On the basis of the above, we trust that Council's concerns outlined in **Item 29** are suitably addressed.

2.17 Lawful Point of Discharge

Item 30

The proposed Lawful point of discharge as demonstrated on the 'Preliminary Stormwater Drainage Layout Plan' is generally in accordance with Council's requirements. Additional information is required to clarify the proposed stormwater system arrangements on the Sherwood Road frontage and to demonstrate there are no adverse impacts from the arrangement in accordance with PO1, PO3 and PO6 of the Stormwater code.

- a. *Confirm the proposed location of the relocated stormwater gully pit and demonstrate that it does not conflict with pedestrians boarding or alighting from public transport services within the adjacent bus zone.*
- b. *Provide a cross section of the verge and stormwater treatment tank that includes the elevations of the tank and surface/ground levels to demonstrate how the surcharge will occur from the system.*

- c. *Demonstrate that any surcharge resulting from the stormwater treatment system is contained within the verge and does not adversely impact pedestrian movements, public safety or surrounding infrastructure within the road reserve.*

Response

Item 30

In response to **Item 30**, ADG has prepared a Flood Engineering Response which is enclosed within **Appendix G**. Specifically:

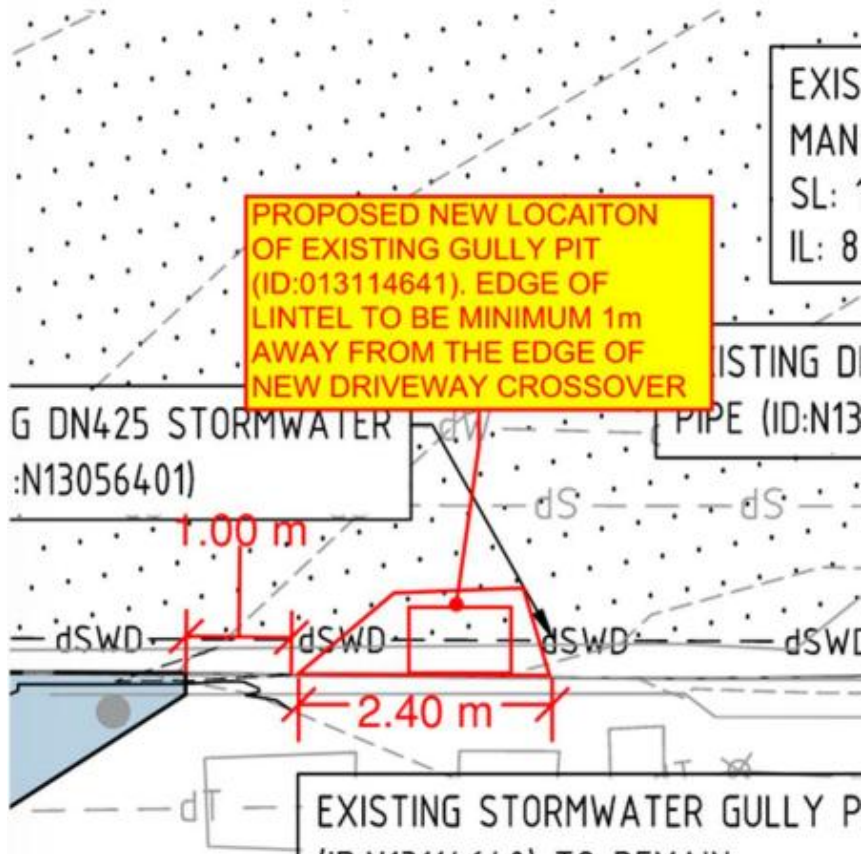
- In response to **Item 30(a)**, the existing gully pit is proposed to be relocated to the eastern side of the proposed driveway, clear of the bus zone including a 1m separation from the edge of the new crossover wing as shown below in **Figure 14**.
- In response to **Item 30(b)**, additional drawings has been prepared by KHA, which confirms the proposed surcharge pit location (refer to **Figure 15** and **Appendix B**). The drainage system has been designed to ensure that any surcharge is intended to occur at the proposed 900 x 900 grated pit aligned with the frontage boundary, which will be set lower than the development's finished ground floor level at street level. This allows surcharge flows to discharge safely at the site frontage without impacting the building. ADG confirms that the proposed stormwater solution, involving surcharging major flows from the private stormwater systems to road reserve is a commonly accepted design outcome by Brisbane City Council.
- In response to **Item 30(c)**, the proposed stormwater treatment tank incorporates a high-flow bypass arrangement to facilitate the safe conveyance of major storm flows without adversely impacting the performance of the treatment system.

ADG has undertaken a surcharge assessment based on the difference between Q50 (2% AEP) and Q10 (10% AEP) flow rates, representing an estimated surcharge flow of approximately 282 L/s. The outcomes of the assessment confirmed that the proposed stormwater treatment system satisfies the intent of the City Plan's Stormwater Code and QUDM major drainage design requirements for the following reasons:

- The proposal involves a maximum flow depth of approximately 54mm, a flow velocity of approximately 1.49 m/s and a DV product of 0.08, which is less than the QUDM maximum allowance for pedestrian safety.
- The proposed surcharge pit and associated drainage infrastructure provide temporary storage prior to surcharge, which assists in attenuating the initial discharge to the verge and further reduces the immediate surcharge rate.
- The resulting flow remains wholly contained within the verge and road reserve, including up to Q50 event and is conveyed along the designated overland flow path without causing nuisance flooding of adjoining properties, public infrastructure or pedestrian areas.
- Having regard to the shallow flow depths and low velocities, the surcharge is not expected to adversely impact pedestrian safety, public amenity or surrounding infrastructure.

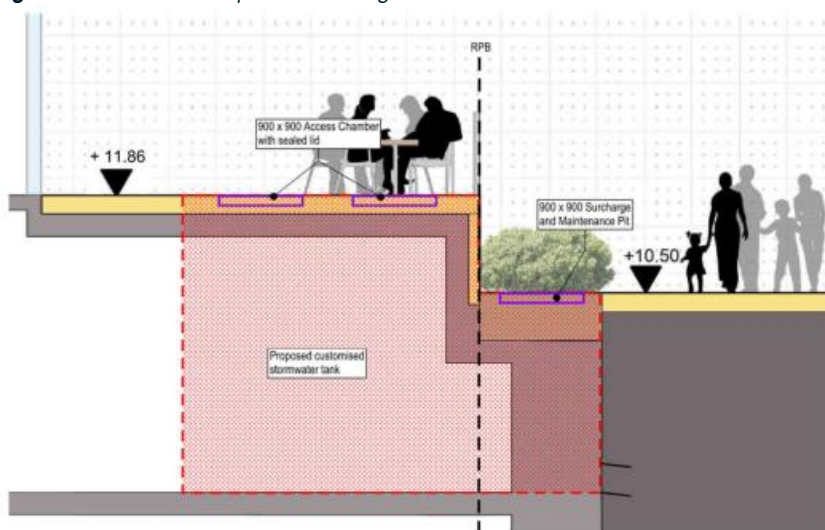
We trust that Council's concerns outlined in **Item 30** are suitably addressed.

Figure 14 – Extract of Proposed New Location of Existing Gully Pit



Source: ADG

Figure 15 – Section of Proposed Surcharge Pit Location



Source: KHA

2.18 Construction Management Plan

Item 31

The provided traffic management plan does not any proposed footway or road closures. Please be aware that any future road closures or footway closures will be subject to the Development Services – Construction Management Guidelines – Brisbane Central Business District and City Frame.

Response

Item 31

Footway and/or road closure permits will be sought from the Council on an 'as required' basis. As such, no further response is required to address this item.

3 Minor Changes

The Applicant is proposing to change the application in the way identified in the revised plans, as specifically addressed in this correspondence. The proposed changes are made in direct response to matters raised in Council's Further Advice or otherwise constitute a minor change as defined by the Planning Act. Assessment against the substantially different development criteria guideline outlined by the DA Rules is provided below. This demonstrates that the relevant minor changes do not result in the development being substantially different.

For a change that is not a minor change, in accordance with Section 26.1(c) of the DA Rules, the assessment process does not stop where the assessment manager is satisfied that these changes are in direct response to matters raised in Council's Further Advice. Accordingly, the Applicant respectfully requests that Council accept these changes and confirm that the assessment process continues in accordance with Part 5 of the DA Rules.

For completeness, key minor changes relate to:

- Minor reconfigurations to apartment layouts, resulting from the design changes required to address Item 4 of Council's Further Advice Request. These include updates to balcony locations and sizes, however, importantly ensure that the minimum proposed balcony size of 8.1m² is retained.
- Elevations included in **Appendix B – Revised Architectural Drawings** have been updated to reflect the abovementioned changes to balcony layouts.
- Subsequent minor updates to non-residential and residential GFA and site coverage, illustrated on Sheet A0001 – Development Schedule of **Appendix B – Revised Architectural Drawings**.

In addition, ongoing design refinement has led to a number of minor changes to the proposal to enhance the feasibility, functionality and built form outcomes for the broader precinct.

Criteria	Response
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a. Involves a new use	No new land uses are introduced as part of the Applicant's amendments made to the development scheme in response to Council's Further Advice.
b. Results in the application applying to a new parcel of land	The revised architectural drawings do not introduce a new parcel of land.
c. Dramatically changes the built form in terms of scale, bulk and appearance	The revised proposal further addresses Council's concerns on the perceived bulk of the podium form as viewed from the public realm. Any other minor design refinements do not dramatically change the built form beyond what has been directed by Council in this Further Advice correspondence.
d. Changes the ability of the proposed development to operate as intended	The above minor changes do not impact the ability of the proposed development to deliver substantial housing supply within the inner city suburb of Toowong, complemented by a diverse range of activated uses including dining options, retail components and health and lifestyle facilities. The development remains as a residential-led, mixed use development.
e. Removes a component that is integral to the operation of the development	The revised proposal does not remove a component that was integral to the operation of the development.
f. Significantly impacts on traffic flow and the transport network, such as increasing traffic to the site	The changes do not change the assumptions and mitigation measures provided in the traffic assessment submitted with the as-lodged scheme beyond those outlined in Section 2. Car parking supply and servicing arrangements have been detailed further in direct response to Council's Further Advice request. Refer to Appendix E – Traffic Response for further detail.
g. Introduces new impacts or increase the severity of known impacts	The changed proposal is not anticipated to introduce new impacts, nor will it increase the severity of known impacts. The supporting technical material that accompanies this response has addressed all potential impacts arising from the minor changes being made to the proposal.
h. For a development prescribed by the Planning Regulation as requiring social impact assessment as identified under section 106T of the Act –	The proposed development does not require a social impact assessment.

a. Introduces new <i>social impacts</i> or increases the severity of known <i>social impacts</i>	
i. Removes an incentive or offset component that would have balanced a negative impact of the development	The minor changes do not remove an incentive or offset component on the site.
j. Impacts on infrastructure provisions	The minor changes do not impact the anticipated infrastructure provisions to be delivered on the site.

4 Conclusion

We once again thank Council for its continued work undertaken in the assessment of this application. The Applicant has taken the time necessary to revisit the design of the proposed development and make appropriate changes to the design in direct response to the matters raised by Council in its request for Further Advice.

We trust that the information contained in this response and its associated attachments provides Council with the relevant detailed necessary to progress its assessment. For completeness, we request Council proceed with finalisation of its assessment of the application in accordance with Section 35 of the DA Rules.

In light of the amendments made in response to Council's Further Advice, we respectfully request Council's confirmation that the revisions made are considered minor in nature and do not warrant any additional public notification.

Should you wish to discuss any of the above or attached material in greater detail, please do not hesitate to contact myself, **Ben Lyons** (Partner), **Melanie Kwok** (Associate Director), or **Rauha Firaq** (Consultant) on (07) 3007 3800. We look forward to continuing to work with Council in relation to this city shaping opportunity for Brisbane.

Yours sincerely,



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