



Dedicated to a better Brisbane

10 July 2026

Immerse Projects 17 Pty Ltd
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GPO Box 1506
BRISBANE QLD 4001

ATTENTION: Nicole Boulton
Application Reference: A006913504
Address of Site: 22 SYLVAN RD TOOWONG QLD 4066

Dear Nicole

RE: Further advice

A review of the information request response has been undertaken and it has been determined that further advice is required to fully assess the development application.

Building Setbacks and Privacy

- 1) While the revised design includes amended setbacks, the privacy concerns identified in the Information Request have not been adequately addressed. Additional side-facing balconies have been introduced, and eastern setbacks have been reduced to 3m, where setbacks were previously 4.2m-4.5m. Provide the following:
 - a) Screening to all side-facing balconies located less than 4.5m from a boundary.
 - b) Revised balustrade treatments capable of improving privacy outcomes, such as battened, perforated or comparable privacy screens.
 - c) Details of any privacy and sun-shading measures, including drop-down blinds where proposed.
 - d) Where habitable rooms or balconies are located within 4.5m of the eastern boundary and are not screened by solid walls, demonstrate how the design will achieve the privacy outcomes of the City Plan. Integrated privacy screening measures may be required.

Podium Façade Design and bulk

- 2) While the eastern podium façade now incorporates some articulation, the overall depth, modulation and architectural expression of the podium has been reduced. The revised design results in a bulkier podium form. It is also unclear whether some façade elements can be accommodated within the available floor plate. Provide the following:
 - a) Plans demonstrating that all proposed podium planters can be accommodated without impacting podium parking.
 - b) Increased façade articulation and depth capable of creating shadowing and reducing perceived building bulk.

- c) Clarification of the podium section locations and consistency with the floor plans.
- d) Removal of the podium roof structure over the nominated deep planting area, as deep planting must be open to the sky.

Buildings that Breathe

- 3) The eastern and western elevations continue to contain a high proportion of glazing, with limited external shading and opportunities for natural ventilation. Provide the following:
 - a) Louvre windows to habitable rooms.
 - b) Sliding screen doors where sliding doors are proposed to facilitate natural ventilation.
 - c) Additional solid wall elements and more substantial balustrade treatments to the western elevation to reduce reliance on glazing.
 - d) Details and dimensions of all slab projections, awnings and shading devices proposed to the northern and eastern elevations.
 - e) Further justification demonstrating how the eastern and western façades achieve the outcomes sought by the Buildings that Breathe guidelines..

Note: Council remains concerned that the eastern elevation is overly glazed and lacks sufficient shading elements to respond to its orientation. While screening outcomes on the western elevation have improved, the façade continues to exhibit a high proportion of glazing.

Flood resilient design

- 4) It is acknowledged that removable, flood-responsive bi-fold doors for the retail tenancy are now proposed. However, insufficient detail has been provided to demonstrate the suitability, operation and ongoing management of these measures in a flood event. Provide the following:
 - a) Specifications for the proposed bi-fold door system, demonstrating its suitability and performance during flood events.
 - b) Details of the proposed flood protection measures for the retail tenancy and associated amenities, including how flood ingress will be prevented.
 - c) An updated Flood Emergency Management Plan (FEMP) detailing the operation, deployment and maintenance of the flood protection measures, including procedures to ensure future owners and tenants are informed of their responsibilities.
 - d) Details of any fit-out requirements or building management measures necessary to ensure flood-resilient materials and construction methods are used within flood-affected areas.
 - e) Details of lift operation during flood events, including flood protection measures, shutdown procedures and arrangements for occupants who may be unable to use stairs.

Note: The submitted FEMP currently provides only a high-level overview and does not contain sufficient operational detail to demonstrate the long-term management of the proposed flood resilience measures.

Verge Width

- 5) While the proposal achieves partial compliance along Sylvan Road, the reduced verge widths along Landsborough Terrace does not demonstrate an equivalent outcome. The proposed 4.47m and 4.14m verge widths do not provide a consistent Centre Street cross-section and have not adequately demonstrated capacity to accommodate future pedestrian, landscape and infrastructure requirements. Verge widths below 5m may compromise the ability to accommodate a compliant pedestrian path, street trees and essential infrastructure in accordance with the Infrastructure design planning scheme policy. Provide:
- a) Amended plans demonstrating a minimum 5m verge width along all site frontages.

Deep Planting

- 6) The proposal does not adequately demonstrate compliance with PO13h, PO24h, PO25a and PO56 of the Centre or mixed use code. The proposed deep planting area remains substantially below the minimum 176m² required and is fragmented into small planting areas that are unlikely to support the establishment of mature subtropical canopy trees.

Given the scale and bulk of the proposed development, deep planting is required to provide meaningful landscape outcomes, soften the building form, improve amenity and contribute to the subtropical character sought by the City Plan. Provide:

- a) Amended landscape and architectural plans demonstrating an increase of contiguous deep planting capable of supporting mature subtropical canopy trees.
- b) Details demonstrating that the proposed deep planting areas provide sufficient soil volume and dimensions to achieve long-term canopy growth outcomes.
- c) Revised plans confirming that nominated deep planting areas are open to the sky and are not constrained by buildings, structures or podium elements.

Note: Podium planters and raised landscaping do not constitute deep planting and cannot be relied upon to satisfy the deep planting outcomes of the Centre or mixed use code.

Swept Paths and On-Street Parking

- 7) Provide further information addressing the following:
- a) Updated swept path plans demonstrating through-road clearances measured to the opposite kerb line. The assessment is to specifically address potential conflicts associated with the refuse collection vehicle egressing onto the opposite side of Landsborough Terrace near the adjoining intersection.
 - b) Confirmation of the total loss of on-street parking spaces resulting from the removal and reinstatement of existing crossovers and the construction of the proposed new crossovers.
 - c) An assessment of the impact of the development on existing on-street parking infrastructure, including parking signs, line-marking, taxi zones, loading zones, 1P parking areas and no-standing zones. Provide an on-street parking layout plan identifying all required signage and line-marking amendments.

Car Parking Facilities – Pedestrian Access

- 8) The proposed design does not demonstrate compliant pedestrian access between the ground floor parking areas and the lifts. Amend the plans to demonstrate suitable pedestrian access for:
- a) Transfer of retail waste, bulky waste and other large items between the retail tenancy, storage areas and foyer lifts.

- b) Access between the basement and ground floor parking and bicycle parking areas and the lifts, including access for users of the PWD parking spaces.

Visitor Bike parking facilities

- 9) The current visitor spaces, near the parking aisle, are all vertical whereas the AS2890.3 requires that 20% of all parking spaces must be horizontal. The bike parking facilities must be in accordance with AS2890.3:2015, i.e., to have a functional bicycle parking facility that is easily accessible and is easy to store and retrieve bicycles that does not interfere with pedestrian access and is protected from motor vehicles access. (*Note: The typical bike envelope is 1800x 500 x 1200 high*).

The current bike spacing plan measurements of the plan do infer that these spaces will be all vertical and will require that the horizontal alignment of handlebars to be offset by 300mm as per figure B7 of the AS2890.3.

These facilities are also not designed to reasonably be protected from motor vehicle encroachment into bicycle parking area (clause 2.4.1 of the AS2890.3), i.e. the bike facility is measured to be 1.2m wide (the bike envelope size) which does not provide a minimum aisle width of 1.50m, which is to be measured from wall to inside face of safety protection bollards.

This would also reduce the parking aisle width from the AS2980 minimum standard of 5.8m to a maximum of 5.4m, which of course is not acceptable.

- a) Amend the Ground floor level visitor bike parking facility, currently shown in the parking aisle, to comply with AS2890.3 Parking facilities, Part 3: Bicycle parking.

Residents Bike Parking facilities

- 10) The six bike (vertical) parking spaces, adjacent to car spaces, 2.35; 3.39; 4.39, do not maintain the required minimum 1.50m aisle width and should be relocated.

- a) Amend the plans to demonstrate compliance.

Waste Storage and Collection

- 11) The Waste Management Plan does not adequately demonstrate:

- The transfer, storage and collection of bulky waste items, including a compliant access route between tenancy floors, lifts and waste storage areas. There is also no transfer route / ramp for the commercial waste to storage areas - only via stairs.
- The management, storage and disposal of problem wastes, including e-waste, batteries, cardboard, polystyrene, printer cartridges and unwanted clothing.

- a) Amend the Waste Management Plan and architectural drawings accordingly.

Fire Control Room

- 12) The plans do not demonstrate that the Fire Control Room (FCR) or Fire Control Centre (FCC) is located above the applicable flood immunity level. In accordance with the Flood overlay code, essential electrical services, including fire control facilities, are required to be located above the 1% AEP flood level plus 500mm freeboard.

- a) Amend the plans accordingly.

Flood Risk Assessment and Emergency Management

- 13) It is acknowledged that Allan & Dennis' information response dated 28 May 2026 includes a Flood Emergency Management Plan. Given the substantial redesign of the proposal,

the Flood Risk Assessment dated 14 November 2025 is to be updated to reflect the revised development. The consolidated Flood Risk Assessment is to:

- a) Incorporate the revised architectural design.
- b) Document all passive and active flood mitigation measures.
- c) Demonstrate the development's flood resilience measures.
- d) Incorporate the Flood Emergency Management Plan framework and relevant information response material.
- e) Reassess residual Brisbane River flood risks having regard to the revised building form.
- f) Demonstrate compliance with the Flood overlay code.

Fuel Burning Equipment

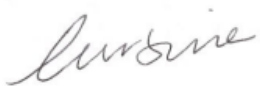
- 2) The submitted information does not adequately identify the proposed fuel-burning equipment, including the rooftop standby generator and the two fire booster pumps located on the mezzanine level. Provide the following:
 - a) The maximum fuel-burning capacity of the standby generator and each fire booster pump, expressed in megawatts (MW). The currently provided consumption rate of 0.240 g/kWhr cannot be readily converted to MW.
 - b) Details of the fuel source for the standby generator, including fuel type, storage quantity and storage location.
 - c) The location of all vents associated with the standby generator and fire booster pumps.

Note: Should the cumulative fuel-burning capacity of all plant and equipment exceed 0.1 MW, an additional land use classification (i.e. High Impact Industry) may be required under Table SC1.1.3.A. In this circumstance, the use may not be considered minor or ancillary and will require assessment against the industry code, including matters relating to noise, air emissions and dangerous goods.

Should you wish to amend the application to resolve these matters it is recommended that you stop the current period by written notice in accordance with the Development Assessment Rules.

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

Yours sincerely



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