

15 May 2024

The Manager, EDQ Development Assessment
Development Assessment Division
Department of State Development, Manufacturing, Infrastructure and Planning
GPO Box 2202
Brisbane Qld 4001

Attention: Vivian Lun, Planner – Development Assessment

Dear Vivian,

RESPONSE TO FURTHER ISSUES LETTER

PDA DEVELOPMENT PERMIT FOR MATERIAL CHANGE OF USE FOR MULTIPLE DWELLING, SHORT-TERM ACCOMMODATION, RETIREMENT FACILITY, SHOP, FOOD AND DRINK OUTLET, HEALTH CARE SERVICE, EDUCATIONAL ESTABLISHMENT, BAR, HOTEL AND INDOOR SPORT AND RECREATION AT 5 HERCULES STREET, HAMILTON

MEDQ REFERENCE: DEV2022/1323

Mewing Planning Consultants act on behalf of Limitless Residential No. 9 Pty Ltd (the **Applicant**) in relation to the site at 5 Hercules Street, Hamilton (Lot 1 on SP231749 and Part 0 on SP172640 (Access Easement)) (the **Site**).

We refer to the correspondence from Economic Development Queensland (**EDQ**) dated 19 March 2024 constituting a Further Issues letter.

Please accept this correspondence, on behalf of the Applicant, as a response to the Further Issues letter, providing a response to all items in the Further Issues letter.

The following attached response extracts each part of EDQ's Further Issues letter and provides a corresponding response. The response includes the following documentation:

- **Attachment A** – EDQ Further Issues Letter;
- **Attachment B** – Architectural Package, prepared by Plus Architecture;
- **Attachment C** – Landscape Concept Plan, prepared by Archipelago;
- **Attachment D** – Civil Engineering Response Letter, prepared by Naxos Engineers;
- **Attachment E** – Site Based Stormwater Management Plan, prepared by Naxos Engineers;
- **Attachment F** – Traffic Engineering Response, prepared by TTM; and
- **Attachment G** – Operational Refuse Management Letter, prepared by TTM.

Having responded to this Further Issues letter, the Applicant now requests EDQ's agreement to proceed to public notification of the PDA Development Application.

We would welcome the opportunity to discuss any aspect of this Further Issues response, together with the response to the information request. Should you wish to discuss, please contact Leo Mewing on 0421 780 354 or at leo.mewing@mewing.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Leo Mewing', with a horizontal line underneath.

Leo Mewing
Director

Mewing Planning Consultants

Further Issues Response

5 Hercules Street, Hamilton

M E W I N G
P L A N N I N G
C O N S U L T A N T S

Introduction

The following correspondence provides a response to the Further Issues letter dated 19 March 2024 (**Attachment A**). The correspondence has extracted each part of EDQ's request in italicised text and provides a corresponding response below.

At the outset, we note that the proposed development was originally conceived in a comprehensive and coordinated manner, including through engagement with EDQ, and the amended development outcome in response to EDQ's Further Issues letter has equally been progressed in a comprehensive and coordinated manner. That comprehensive and coordinated approach has maintained regard to EDQ's ongoing feedback and collaboration through pre-lodgement and post-lodgement engagement. Further, the response has been cognisant of enabling a quality and viable development to be delivered.

Proposed Gross Floor Area

Item 1

While the proposed total Gross Floor Area (GFA) and plot ratio are generally within acceptable bounds, it is imperative to address several deficiencies in the development plan. Specifically, there are notable shortcomings in communal open space and landscaping provisions. Additionally, concerns have been raised regarding manoeuvrability within the podium levels' carpark. Rectifying these issues is essential to ensure the overall functionality and appeal of the proposed development.

The assumed ultimate developed area for this site within the Development Charges and Offset Plan (DCOP) planning is 5,528m² GFA. The development proposed a GFA of 12,384m² which substantially exceeds the DCOP planned GFA.

The Trunk Infrastructure Capacity Report and a Service Advice Notice submitted with the application are for a previous development scheme and a lower gross floor area compared to the currently proposed, revised documentation from Urban Utilities is required to be provided to EDQ.

Item 1 Response

Amendments have been made to the proposed development, having regard to EDQ's feedback and in balance with achievement of a quality and viable development outcome. Please refer to the response to each of the specific items provided throughout this correspondence.

In respect of infrastructure capacity, please refer to the response to item 9 and the supporting Infrastructure Capacity Letter prepared by Naxos Engineers (**Attachment D**) which confirms there is sufficient capacity within Urban Utilities' networks to accommodate the proposed development.

Easement Use and Owners Consent

Item 2

The subject site is burdened by Easement A on RP201549. Although the easement documentation has been submitted with the application material, it hasn't been identified how the development and uses within the easement are consistent with the terms of the easement. Owners' consent may be required.

Submit to EDQ further information to demonstrate that the proposed uses within the easement area are consistent with the terms of the easement and, if necessary, provide a signed owners' consent from the owner of Lot 645 SL2184 and an amended application form to include Easement A on RP201549.

Item 2 Response

The subject site is burdened by an existing easement along the northern boundary that is in favour of adjoining land (Lot 645 and SL2184) for access and services purposes for the existing sewerage and stormwater pipes.

The easement area remains unobstructed at ground level and allows for the existing infrastructure within to be accessed and maintained at anytime (as per the terms of the easement document). The upper levels (Level 2 – Level 4) of the proposed development cantilever partially over the top of the easement area but importantly remain accessible at ground level, with the existing infrastructure located underground. Furthermore, the adjoining land to the north is subject to an existing development approval and the existing easement will be extinguished in the future (once the approved development is carried and the existing building is demolished – that is, any change to the adjoining site will extinguish the easement).

Having regard to the above, the proposed development does not conflict with the terms of the existing easement and therefore owner's consent has not been provided, nor has an amended application form been provided.

Communal Open Space

Item 3

Section 2.6.2.3 of the Northshore Hamilton PDA Development Scheme requires development with a residential component to provide universally accessible communal open space designed in accordance with the Scheme and the greater of a minimum 80% of the site area, or 15% of the residential gross floor area of the development. The Scheme also requires non-residential development to provide a minimum of 10% of the gross floor area of the development as communal open space.

The proposed communal open space is significantly under the required Scheme minimum for both the residential and non-residential components of the development. Additionally, the spaces provided do not meet the Scheme requirements in terms of design and dimensions.

Review the design of the development and existing podium levels and provide amended plans that demonstrate compliance with the minimum communal open space requirements. Recommend relocating some of the internalised communal facilities to lower levels of the podium to increase the level of active uses provided within podium, where this can be achieved in conjunction with the changes to carpark manoeuvring discussed further in this letter.

Item 3 Response

Amendments have been made to the extent and distribution of communal open space, in particular with greater allocation to residential communal open space on the top of the podium, provision of activating communal open space at the ground level, and continues (and revised) provision of communal open space areas within the podium and on the top of the podium. The communal open space provides a range of features and activities, including pool, outdoor terraces, outdoor dining, indoor dining, resident lounges, resident gyms, and meeting rooms (related to work from home and resident activities). Please refer to the Architectural Package contained in **Attachment B** for a detailed illustration of the areas and dimension of each communal open space area.

Communal open space for the proposed development has been divided into separate allocations for the residential apartments (834m²) and those to be utilised by visitors to the short-term accommodation

units (502m²). For the purposes of demonstrating compliance with the Northshore Hamilton PDA Development Scheme, the residential component (multiple dwelling) is required to provide communal open space at a minimum of 80% of the site area or 15% of the residential gross floor area.

The residential component results in 5,391m² GFA, with the proposed communal open space allocation (834m²) equating to 15.47% of the overall GFA and therefore achieves compliance with that component of the Development Scheme. Furthermore, when incorporating the additional communal open space areas allocated to the short-term accommodation, the combined allocation (1,336m²) has a ratio of approximately 96.60% of the site area.

It is important to recognise the mixed-use nature of this development, which includes both residential apartments and short-term accommodation. Those uses have some interface, which will share elements of the communal open space area. As such, it is appropriate to apply the overall 80% of site area provision to the communal open space in this instance, recognising the mixed use and shared operations outcome in this instance. The development exceeds that 80% provision.

It is also recognised that the development benefits from proximity to a range of local recreation facilities, including the Hercules Street Park, riverside boardwalks and bikeways, dining and entertainment facilities and other local activities, for which the development will further activate and contribute to their viability. This is a consequence of both the residential and short-term accommodation uses. Over-burdening the project with further communal open space, and denying the locality the benefit of activation through increased utilisation by residents and visitors, would be a poorer local outcome.

Rooftop

Item 4

The Scheme requires the rooftop to have plant and equipment screened and the roof form to be varied, providing architectural distinction. Currently, the rooftop is flat with solar panels. Given the communal open space deficit, it is recommended that the rooftop be redesigned to allow for communal open space areas as well as solar panels. Where height provisions allow, consideration may be given to raising the solar panels to provide communal open space below. Alternatively, consolidate the solar panels onto one portion of the roof and provide a roof top communal open space exclusive for residents (not hotel guests).

Consideration should also be given to reflectivity of these panels within the flight path and appropriate clearance between solar panels and other uses (such as garden) to ensure there is sufficient room for maintenance of the panels and garden. Submit amended plans that address the above concerns to EDQ.

Item 4 Response

As detailed in the Sustainable Assessment Report prepared by Built Environment Collective and submitted as part of the original lodgement package, the proposed development includes various ESD initiatives to yield a residential energy efficiency of 6.51 Stars, with the current design of the rooftop a contributing factor to the proposal exceeding the minimum requirements (5 Stars).

The green roof, landscaping elements and solar responsive paint to be incorporated results in 83% reduction in the site's urban heat island effect and the solar PV system results in a reduction in peak energy demand by 35kW or 15%.

As demonstrated in the response to Item 3, the proposed development provides an appropriate allocation of communal open space to capacity for the recreation needs for both long stay residents (multiple dwelling) and short stay visitors (short-term accommodation) and therefore the current design of the rooftop has been maintained without extending communal open space to the rooftop.

The rooftop design otherwise achieves the outcomes sought by EDQ – the plant area is suitably screened, the solar panels are screened and sit low on the rooftop such that they are also screened by the surrounding landscape, and the roof form is varied by way of stepping between level 22 and the rooftop with provision of landscaping at those steps to create building cap interest and distinction.

The solar panels on the roof will be installed in a manner to ensure it does not reflect light into the flight paths of any aircraft from the Brisbane Airport, and can be conditioned according to EDQ (including the provision of post-construction certification from a suitability qualified person in the lighting / materiality reflective compliance field). Appropriate area for maintenance of the solar panels, and of the gardens, is provided as shown on the architectural drawings and landscape drawings.

Privacy

Item 5

The adjoining property (19 Hercules Street) has an approval for multiple dwelling units with podium and loading areas adjacent to the proposed recreation area on level 4.

Demonstrate how the proposed design responds to the adjoining development and respects privacy of both users.

Item 5 Response

Whilst it's acknowledged that the adjoining property at 19 Hercules Street is subject to an existing development approval (EDQ Reference: DEV2020/1165), the apartment tower identified closest to the development is noted on the approved plans as 'indicative outline of future stage' and is currently not approved by EDQ and subject to change. However, the approved development does involve the construction of some retail tenancy space and servicing areas (non-habitable spaces) on ground floor level and are built to boundary (as illustrated in **Figure 1** below). Further, there is a mezzanine level containing non-residential uses which is setback 9 metres, and the outline elevations and 3D perspectives show that there is a podium intended for tower 4 (that interfacing the site) which is substantively built to boundary (meeting the proposed development's built to boundary outcome, consistent with the expectations of the Development Scheme).

With the exception of the proposed substation and MSB room (which are built to boundary), the proposed interface with the adjoining development at ground level is to carparking / manoeuvring areas which is to be screened by a 2m wide acoustic barrier and boundary landscaping. Furthermore, neither of the ground floor levels of the two developments are to be utilised for residential purposes and therefore will not result in any amenity to privacy issues. At the podium level, the built to boundary outcome has an appropriate interface to the indicative built to boundary podium represented on the adjoining development's drawings, or to the setback non-habitable mezzanine space. This does not result in any residential amenity impacts on either development.

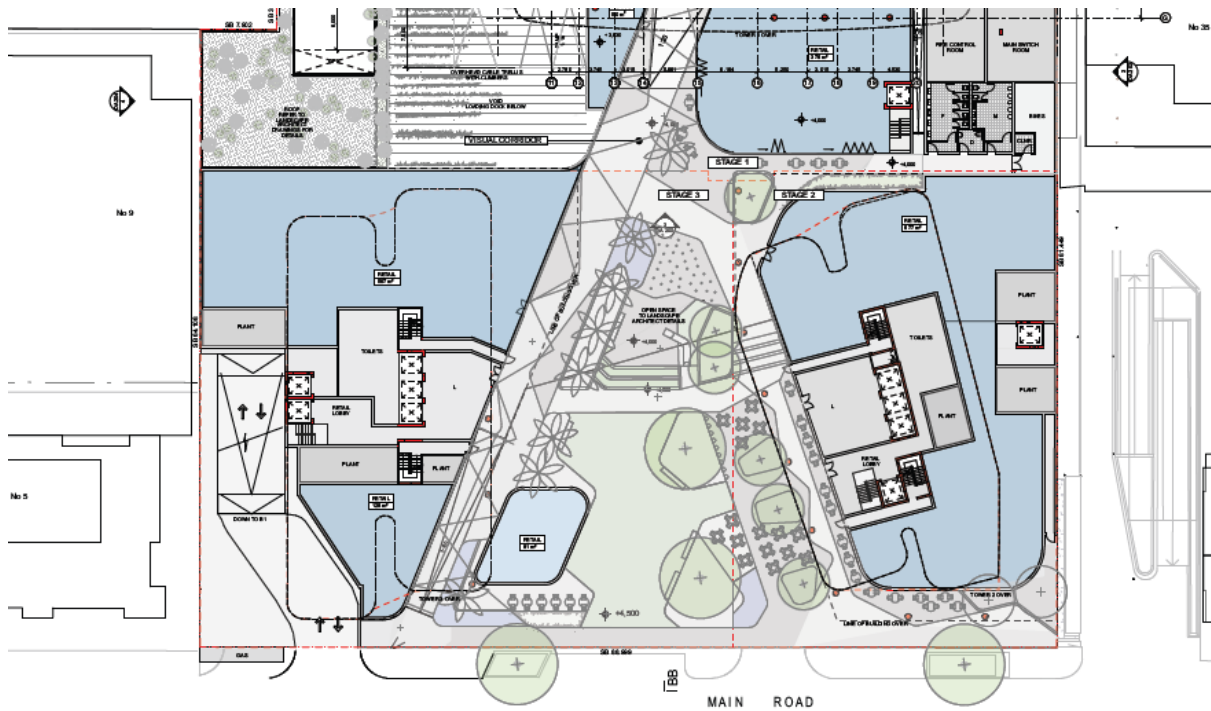


Figure 1 – Approved Ground Floor Plan for 19 Hercules Street, Hamilton (DEV2020/1165)

The indicative location of the future tower on the adjoining property has been plotted onto the architectural plans and as illustrated in **Figure 2** provides a separation distance of 18 metres between both buildings (tower component) which is substantially larger than the separate distances achieved between the proposed development and approved development to the north (14 metres).

The recreation area on level 4 (including the pool and deck) have been screened by a solid wall to avoid any direct overlooking into and from any proposed apartments on the same level for the adjoining development, with a proposed setback of 9 metres (i.e, 18m separation) to be provided between both development (based on the current indicative outline of the future tower).

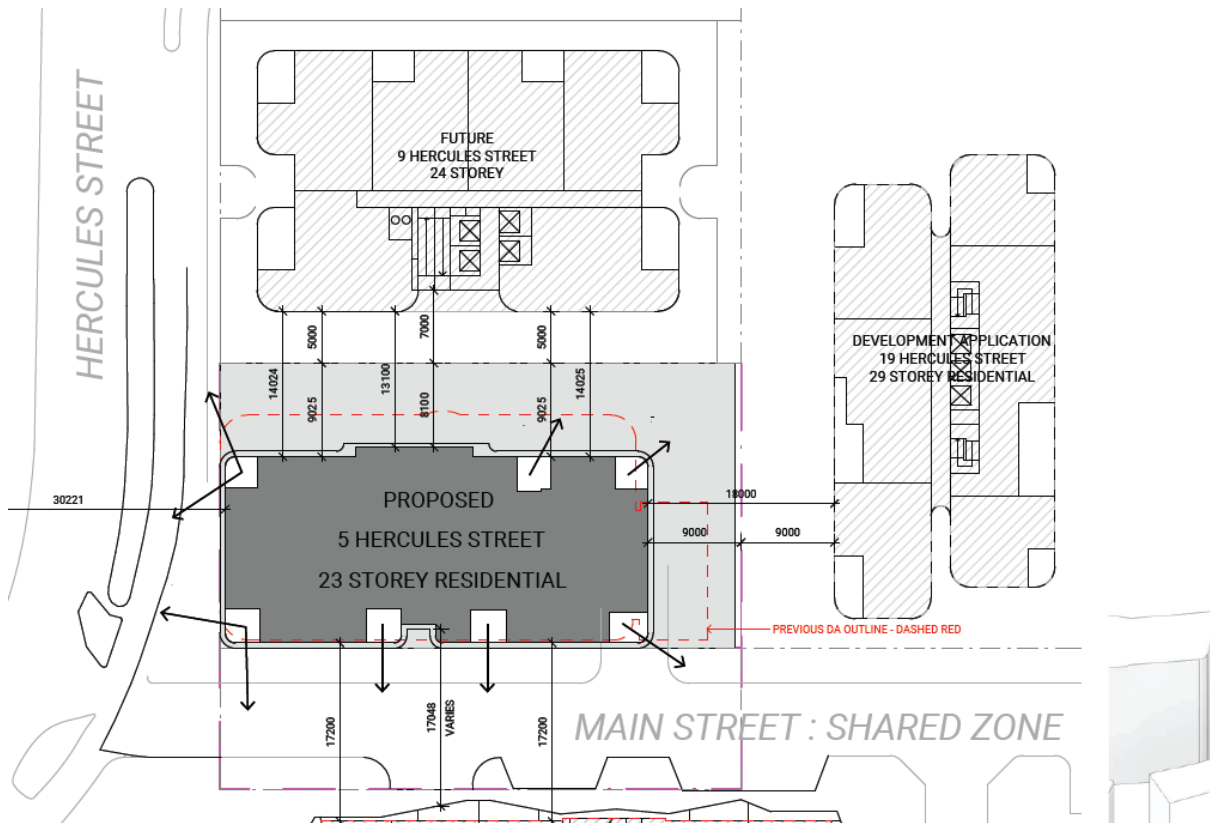


Figure 2 – Proposed Setback / Separation Distances to adjoining development at 19 Hercules Street

Landscaping

Item 6

a) Deep Planting

PDA Guideline 8 - Medium to High Rise Building requires developments to provide landscape and recreation space of 20% of site area including 5% of site area as deep planting with 5 metres minimum dimension. The Scheme further requires the development to provide deep planting along a minimum length of 50% of the street frontages.

Calculations of landscape area quantity have not been provided however, the proposed landscape design does not appear to provide the required deep planting.

Submit amended landscape plans to EDQ that shows the calculations of all landscape areas, ensuring the required deep planting is provided. Where planters are proposed, provide details of the proposed depth and width of containerised planting areas to ensure they maximise the planting of trees within those areas.

Item 6a Response

The proposed development has been holistically conceived, based on extensive and iterative engagement with EDQ over a period of time. Throughout that engagement, the approach to providing a podium across the site has been acknowledged and accepted, and at no stage has it been identified that deep planting areas are sought. This has inherent logic, as the urban context for this site is for the expression of a strong podium form, which will find coherence to the adjoining developments. This is further reinforced by the intended corner landmark site outcome being pursued (and discussed).

That being said, the proposed development provides a deep planting outcome to the corner of the site, with a subtropical tree planted into natural ground and exposed to light and air for growth, which creates a distinctive and attractive corner landscape setting, as shown in **Figure 3** below.



Figure 3 – Corner feature tree design (note that tree is slightly ghosted)

In addition, changes have been made to the landscaping atop the podium, to increase the dimensions of planter beds at the podium edges to allow for larger trees to be provided. This outcome was discussed with EDQ planning representatives, prior to these changes being made for submission. Those trees become expressive in the streetscape, with a landscape value aligned to the planning principles expressed in the Development Scheme. Whilst they are not deep planting areas within natural ground, they are provided with planter width and depth such that the soil volumes are aligned to a deep planting outcome which can ensure the sustainable and viable growth of larger tree species, as is proposed.

In addition, the total quantum of landscaping has been increased, to a total of 782.5m², equating to 56.62% of the site area (exceeding the communal open space recreation areas). This exceeds the 20% requirement of the Development Scheme.

b) Planters

Further there is concern that the planters proposed will not allow for viability and longevity of the plants proposed due to location and/or size of the planters. In particular:

- *The majority of the area of Level 4 will be under roof and it is unclear how the trees are meant to grow with limited access to light; and*
- *Maintenance of green roofs provided on floors 5-11 and 12-21 is unclear given their size and location facing the adjacent building;*

Submit to EDQ amended landscape plans that clearly demonstrate the following:

- *Sufficient deep planting will be provided on site along with suitable widths and depths of planters and depth of soil;*
- *Appropriate clearance between solar panels and garden in accordance with solar panel manufacturers instructions to ensure there is enough room for maintenance; and*
- *Provide a concept cross section of the proposed rooftop garden area that details the soil depth, waterproofing, drainage and irrigation.*

Item 6b Response

The planter beds have been amended to address EDQ's comments, with the width and depth of planters increased to improve soil volumes (particularly at level 4, with others already suitably dimensioned). Please refer to the amended landscape package in **Attachment C**.

In respect of the items raised by EDQ, the Applicant advises as follows.

- The planters to the podium street edges (level 4) are to the north and west, and will be provided with daylight and sunlight to allow suitable plant and tree growth. Where landscape is located below the roof, the appropriate shade-tolerant species have been selected.
- Maintenance of the planters on 5-11 and 12-21 will be by way of abseil and/or body corporate agreement for access. This is typical and common in high rise residential projects.
- A response to deep planting landscaping is provided per item 6a.
- Further detail is provided in **Attachment C** regarding the clearance between the solar panels and the rooftop landscape elements. Maintenance access is provided.
- A concept cross section of the proposed rooftop garden area that details the soil depth, waterproofing, drainage and irrigation is provided in **Attachment C**.

c) Beehives

Limited information regarding the beehives have been provided with the application including, protection during weather events.

Provide confirmation whether the proposal includes 'Beehives as a Service' and if so, what are the requirements of this service. Demonstrate how the beehives will be protected during storms and high winds. Also, provide updated detailed design plans that illustrate all relevant information.

Item 6c Response

The proposed development no longer includes 'beehives as a service' and all references have been removed from the revised application material.

d) Irrigation Strategy Report

The submitted Landscape Concept Plans have a section for an Irrigation Strategy Report however, the Irrigation Strategy Report has not been provided. Given the extensive area of rooftop gardens and planters on levels, an irrigation concept plan is also required for demonstration.

Submit to EDQ an Irrigation Strategy Report along with an irrigation concept plan.

Item 6d Response

Refer to the Irrigation Strategy Report prepared by Irrigation Design Australia and included as part of their Landscape Concept Plan contained in **Attachment C**. In balancing the desire for rooftop landscape (to address heat island effect) and landscape elsewhere on the building, and the area of rooftop available for water capture, the irrigation strategy relates to rainwater capture and top up water.

e) Property Boundary

The property boundary illustrated on the submitted landscape design ground level plan is incorrect and does not include the easement. Submit an updated amended ground floor landscape plan to EDQ for assessment.

Item 6e Response

The boundary line has been updated – please refer to the amended Landscape Concept Plan prepared by Archipelago and contained in **Attachment C**.

Sustainability

Item 7

Given that sustainable building outcomes is listed as a sufficient ground for the development, a revised Energy Efficiency Assessment Report is required to be submitted to EDQ to ensure the development will meet, as a minimum, current standards set by the Green Building Council of Australia and the National Construction Code.

a) Energy Efficiency Assessment Report

The assessment has been undertaken against the minimum requirements of a previous version of National Construction Code (NCC) 2019 and references a superseded Green Building Council of Australia (GBCA) tool. The assessment report needs to be updated to reference the current standards.

Submit a revised Energy Efficiency Assessment Report to EDQ including the following:

- *Demonstrate the ability to achieve the minimum requirements of a NatHERS 7 star building to ensure future compliance with NatHERS after 1 May 2024; and*
- *Demonstrate the target points to be achieved by the development under the current Greenstar Buildings rating tool including the below:*
 - i. How minimum expectations will be met;*
 - ii. Credits to achieve a minimum 4-star Greenstar; with a suitable quantity of contingency credits; and*
 - iii. Updated scorecard.*

b) Building Energy Efficiency

The residential levels of the building do not perform as well as the ground floor/podium/hotel levels. The solar absorptance value of 0.6 for the roof is quite high.

It is recommended that alternate materials be considered or provide additional insulating methods to improve energy efficiency on these levels. Provide estimated level of thermal insulation once all parts of the building envelope for the top level apartment are considered. Update energy efficient values for the residential levels for any alternative building envelope materials.

c) Green Star Certification

Section 2.5.4.1 of the Northshore Hamilton PDA Development Scheme requires certification of the development against a sustainability rating tool.

Confirm whether the project will achieve certification via the Greenstar Buildings tool. If this is not achievable, provide details of how a third-party guidance and performance verification will be achieved to obtain an equivalent outcome.

d) Rainwater Harvesting Tank

No information regarding the proposed rainwater harvesting tank provided.

Confirm the proposed location and size of the rainwater harvesting tank on site. Clarify if harvested rainwater will be used for irrigation of the roof top gardens.

Item 7 Response

The Sustainability Assessment Report prepared by Built Environmental Collective (BEC) has been prepared in accordance with the *Northshore Hamilton PDA Scheme Amendment No. 1, October 2022*. The current Development Scheme calls for a minimum 4 Star Green Design and As Built Certificate, as one of three options to demonstrate the development provides for the design, construction and operation of sustainable buildings. The Development Scheme is the statutory assessment basis.

The Green Star Buildings rating tool was first released in July 2021, therefore was an option at EDQ's disposal at the time of publication of the amendment. As such, it was assumed EDQ had reasons for identifying Green Star Design and As Built Design as the rating tool, even though it had been superseded at the time, and the original report was prepared accordingly. A revised assessment to demonstrate compliance with the current Green Star Buildings rating tool has not been provided, with the original reporting demonstrating how the project aims to achieve 4 Star Green Star Design and As Built equivalence (refer to the Green Star scorecard provided).

If EDQ wishes to pursue an alternate mechanism from the Development Scheme, the Applicant may accept a reasonable and relevant condition that requires the development achieve a green star rating pursuant to an alternate criteria (a conditioning approach has been accepted elsewhere).

The original assessment had been completed in accordance with the NCC 2019, with NCC 2022 not in effect at the time of lodgement (commenced 1 May 2024) but had regard to the new requirements. Specifically, the results presented in the assessment showed the average performance of the proposed development is sufficient to achieve 7 Star NatHERS average performance in accordance with NCC 2022.

Solar absorptance has been considered as part of the proposed design and sufficient thermal performance has been incorporated. The performance specifications are not directly comparable between the lower levels and the residential levels, since the assessment methods are different in each case. The performance specification for the hotel and lower levels uses the elemental deemed to satisfy (DTS) method, whereas the residential portion uses software that complies with the House Energy Rating Scheme as the DTS method. The software DTS method for residential (Class 2) enables an amount of “performance trading” between roof, wall and floor elements, whereas the elemental DTS method used for the Hotel (Class 3) and lower portions does not. While it is true that the residential roof performance in isolation is a higher solar absorptance than the solar absorptance of the Class 3 roof, both are still compliant with their respective DTS methods.

Higher solar absorptance increases building thermal load and increases the urban heat island effect. The residential roof has a significant proportion of green roof, which mitigates urban heat island effect and reduces building thermal load. Thus, while the solar absorptance of the remaining residential roof (that is not green roof) is slightly higher solar absorptance, it is not considered significant, since most of the roof is a green roof. The development could otherwise increase insulation levels to increase solar absorptance for the rest of the roof (if necessary).

Rainwater is proposed to be captured and reused for irrigation of landscape and green roof elements, with rainwater tanks to be installed on ground levels, with tank sizes to be in accordance with the findings and recommendations of the Irrigation Strategy Report contained in **Attachment C**. The number of tanks and their location are to be confirmed as part of detailed design, once a hydraulics engineer has been appointed. The tanks can suitably be accommodated within the ground floor (including slung to the slab in the relevant clearance areas).

Traffic, Access and Parking

Item 8

a) Traffic Impact Assessment

The submitted traffic statement/letter is not considered to appropriately identify all relevant traffic impacts and provide adequate solutions. Further, it appears to be based on incorrect details of proposal, ie. Commercial GFA, number of residential units, etc.

Submit a Traffic Impact Assessment (TIA) Report certified by a suitably qualified RPEQ to demonstrate the following:

- i. Compliance against the Northshore Hamilton PDA Development Scheme;*
- ii. Concept road layout plan if on-street parking will be lost. Quantify the loss of on-street car parks. The plan shall include sign and line markings, include kerb build-out for indented parking, etc.;*
- iii. A fully dimensioned scale plan, including gradients, spot levels (for height clearance) for the access and carparking areas, in accordance with the standard prescribed in the development scheme;*
- iv. Denote proposed driveway location(s), type(s) and width(s);*
- v. Accessible car park provisions and locations;*
- vi. Label each parking bay on plan, including the number of PWD, visitor, staff car parking, slow and fast charging, etc.;*
- vii. Adequate sight distance & queuing provisions ;*
- viii. Adequate clear height clearance for service vehicles and PWD spaces;*
- ix. Compliance of End of Trip (EOT) facilities for pedestrians and cyclists, and illustrate the proposed location and number on plans;*
- x. Compliance of service vehicle requirements and provide vehicle turn templates;*

- xi. Turn around space at end of blind aisle (if required); and
- xii. Any consideration/ provision for electric vehicle EV charging for all car park and location of a rapid charger in short term parking.

In addition to this, further information is required to address the parking provision and inconsistency with the parking rates in the Development Scheme and the Transport, Access, Parking and Servicing (TAPS) Planning Scheme Policy of City Plan 2014 as well as the movements within the carpark. It is not clear on the submitted plans how visitors will turn around if visitor spaces are full given the location of the security gate on Level 1. Further detail is also required on how a number of carparks, such as V005-V007, C001-C005 will trigger the signal controls if they are unable to access the holding points on the level they are located on.

Submit the following with the TIA to address the issues raised above to EDQ:

- swept path diagrams certified by an RPEQ to demonstrate how vehicles manoeuvre at the security gate (especially visitors turning around); and
- identify speed humps and speed limit within the carpark and if any speed humps are to be provided they are to be concrete/bitumen, not metal, in accordance with the recommendation of the Acoustic Assessment Report.

Item 8a Response

Please refer to the Traffic Response Letter prepared by TTM, which provides detailed responses to each of the matters raised above.

b) Bicycles Parking and Storage Facilities

The submitted Architectural Plans show that 14 of the visitor bike parking spaces rely on access via an easement along the northern boundary of the site. From review of the information provided, the easement does not allow access other than the purpose of inspecting, changing, altering, replacing, re-constructing and/or repairing pipes. In addition to this, there are concerns with CPTED with the bicycle access in this location. Submit amended plans relocating the 14 bicycle parking spaces elsewhere within the development or demonstrating an alternative accessway for the bicycle parking.

Other bicycle parking spaces within the development do not meet the requirements of Acceptable Solution A13(1)(a) of the Queensland Development Code (QDC) MP 4.1 which requires that bicycle parking and storage facilities are easily accessible. The majority of the bicycle parking spaces are within the podium which could create an unsafe situation with cyclists accessing the dual direction single width ramps within the podium. The resident bike parking spaces located at the northwest corner in podium level 2-3 are between the gap of two (2) car park bays appears to be narrow, not easily accessible and may not comply with AS2890.3.

Advice Note: Alternative strategies may be considered if space presents an issue (e.g. bike mounts above car parking spaces, subject to depth of parking bays).

Item 8b Response

The water metre and booster have been repositioned along the site's frontage to Hercules and allows for the 14 visitor bike parking spaces to be access without needing to enter the easement along the northern boundary (refer to **Figure 4**). Furthermore, these bike parking spaces are now clearly visible from the street frontage and not considered to be result in a poor CPTED outcome.

As detailed in the Traffic Response Letter prepared by TTM (**Attachment F**), the resident bicycle parking provided across the podium levels has a minimum 500mm wide envelope for each space, with each parking and storage facility of sufficient dimension and design to achieve convenient and safe

access. Cyclists are to utilise the internal lift to travel between the parking / storage facilities in the podium and when entering / exiting the development from the ground level lobby.

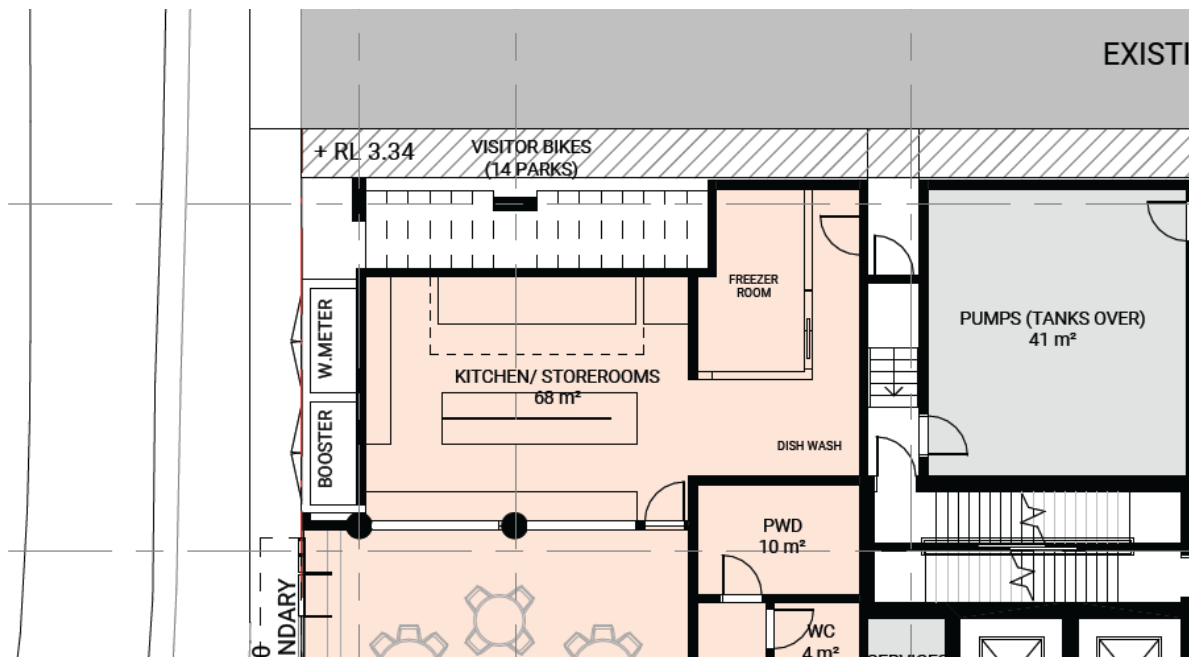


Figure 4 – Revised arrangements for visitor bike parking spaces on ground level

c) Waste Management

Limited information regarding the waste management arrangements have been provided with the application. The development is planned to utilise Brisbane City Council's Waste Contractor for servicing. However, it has been identified that the Council's waste truck would not be able to accommodate the proposed MRV loading bay.

Submit a Waste Management Plan, certified by a suitably qualified person to demonstrate the following:

- i. Compliance against the Northshore Hamilton PDA Development Scheme;
- ii. The location of an RCV standing area/service bay since the development is proposed to be serviced by Brisbane City Council's Waste Contractor;
- iii. Compliance with the TAPS PSP Table 1-4 which identifies that the proposed land uses require one (1) SRB, two (2) VAN and two (2) MRV service bays. If fewer service bays are proposed, RPEQ sign off of the operation of the service area is required;
- iv. Provide a swept path analysis for a RCV (BSD-3008-2) demonstrate adequate turning movement;
- v. Provide a plan that demonstrate the gradient of the RCV service area that does not exceed 1:20;
- vi. Confirm sufficient width if this is located with the corridor to gain access to the MRV loading bay;
- vii. Potential waste demand and type;
- viii. Proposed refuse storage area, collection arrangement and equipment;
- ix. To achieve the required storage capacity, confirm the need of provision and if so, demonstrate the compaction technology achieve the minimum reduction ratio of 3:1; and
- x. Satisfactory Operational and design requirements.

In addition, the current access for the general waste and commercial bins via the easement are not supported unless documentation is provided confirming that the easement can be used for these purposes.

Submit amended traffic assessment and architectural plans showing the below:

- *the size of service aisle and bays comply with BCC TAPS Table 12. Ensure the service area does not impede car parks and the swept path entry; and*
- *A cross section demonstrate the proposed development achieve the height clearance, excluding any pipeworks.*

Advice Note: To ensure a Council's rear-loading RCV can service the site safely and efficiently, an additional buffer space is necessary to comfortably load the bins. Therefore, Council requires a minimum RCV standing/loading bay length of 12m.

Item 8c Response

Please refer to the Operational Refuse Management Plan prepared by TTM (**Attachment G**), which addresses each of the matters raised above.

Stormwater Management (Quantity & Quality)

Item 9

The submitted Stormwater Management Report states the following:

- *"Driveway inlet to be fitted with Filter Baskets". However, the Concept Services Plan, dwg C20-272_SK003, rev D, dated 17/1/2024, does not include this recommendation.*
- *"The development is required to have rubbish bins for general waste to remove gross pollutants generated by the development." However, it does not illustrate on the architectural plan.*

Submit amended plans to EDQ indicate the following:

- *Where the filter baskets should be fitted; and*
- *the number and location of the rubbish bins for general waste to remove gross pollutants generated by the development.*

Item 9 Response

Please refer to the Site Based Stormwater Management Plan prepared by Naxos Engineers (**Attachment E**), which has been revised to each of the matters raised above.

Engineering Services Report (ESR)

Item 10.

The submitted ESR provided a Service Advice Notice (SAN) based on the previous proposed yield. Submit a revised ESR certified by a RPEQ to demonstrate the following:

- *Adequate water & sewer capacities based on the current proposed yield; by obtaining a Service Advice Notice (SAN) from Urban Utility; and*

- *A plan showing the locations of water and sewer connection from the reticulation network.*

Item 10 Response

Please refer to the supporting Infrastructure Capacity Letter prepared by Naxos Engineers (**Attachment D**) which confirms there is sufficient capacity within Urban Utilities' networks to accommodate the proposed development.