

13 November 2024

The Assessment Manager
Economic Development Queensland
GPO Box 2202
Brisbane Queensland 4001

Dear Elrico,

RESPONSE TO INFORMATION REQUEST – 15-21 WREN STREET, BOWEN HILLS (EDQ REF: DEV2024/1479)

We write to you on behalf of *Wren Street Health Investment Pty Ltd* (**‘the Applicant’**), in relation to the above matter. This response is accompanied by, and should be read in conjunction with, the following supporting information:

- **Attachment A** – Amended Development Schedule prepared by Thomson Adsett;
- **Attachment B** – Air Quality Assessment Report prepared by Trinity Consultants;
- **Attachment C** – Key Worker Housing Assessment prepared by Urbis;
- **Attachment D** – Services Advice Notice issued by Urban Utilities.

Each item from the EDQ’s information request letter has been outlined below (*in italics*) along with the respective comments and responses to each item.

1. COMMUNAL OPEN SPACE

“The proposed development does not provide sufficient communal open space in accordance with section 2.6.3.2 of the Bowen Hills PDA Development Scheme (the Development Scheme). In addition to this, the spaces that have been provided on Levels 11 and 12 are inconsistent with the Development Scheme as they do not appear to be positioned for good solar orientation and lack functionality. The “rooftop bar” is not considered to be communal open space as it is accessible to the general public. Provide amended plans demonstrating sufficient area is allocated to communal open space for residents’ indoor and outdoor recreation needs.”

Response:

As requested, the applicant has significantly increased the provision of communal recreation space within the development. The proposed development now complies with Section 2.6.3.2 of the Bowen Hills PDA Development Scheme.

A total of 2,553m² of communal recreation space is now proposed. This represents approximately 15% of the total gross floor area associated with the multiple dwelling units¹.

¹ 17,247m² is the total GFA associated with the proposed multiple dwelling units. Refer to measurements in Attachment A.

Key changes have included the following:

- Level 30 – significant increase in the amount of communal recreation space. This has been achieved by reducing the size of the rooftop bar in order to increase the amount of communal recreation space for residents (refer to Figure 1);
- Level 12 – reduce size of private apartment terraces to increase communal open space area (refer to Figure 2);
- Level 11 – removal of one apartment on this level to increase the amount of communal recreation space (refer to Figure 3); and
- Level 5 – replace car parking areas with a communal office workspace for residents (refer to Figure 4).

The above changes ensure that all residents will be provided with convenient access to a significant amount of functional communal open space at different levels throughout the building. The development is therefore consistent with the outcomes sought by the Bowen Hills Development Scheme.

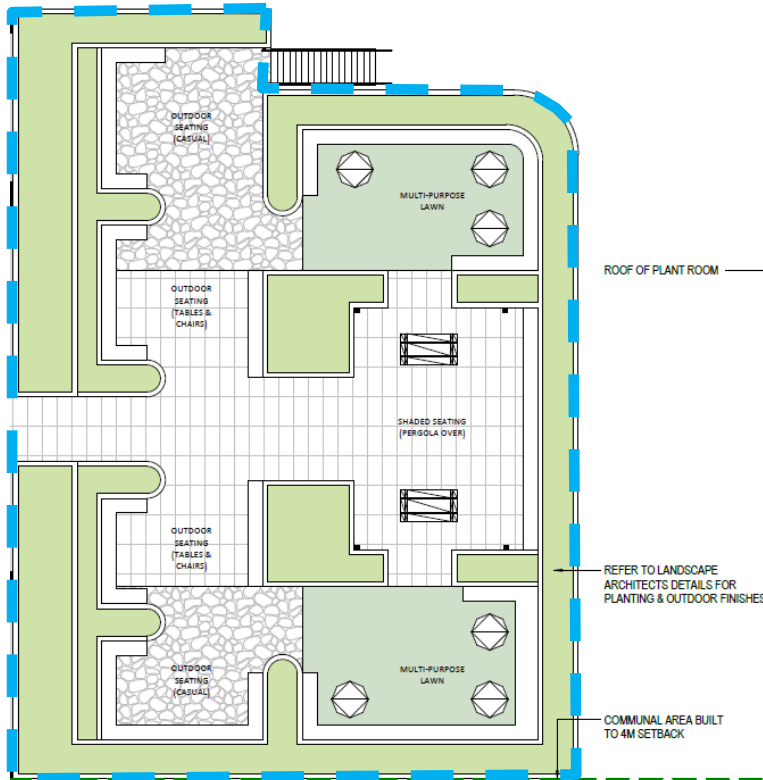
With regards to solar orientation, the rooftop communal open space is located on the northern side of the building and the communal open space on Levels 11 and 12 are located on the southern side of the building (being the two optimal solar orientations for recreation spaces). This ensures residents have will have access to useable and enjoyable outdoor recreation spaces at all times of the day.

Figure 1 – Increased communal rooftop recreation area



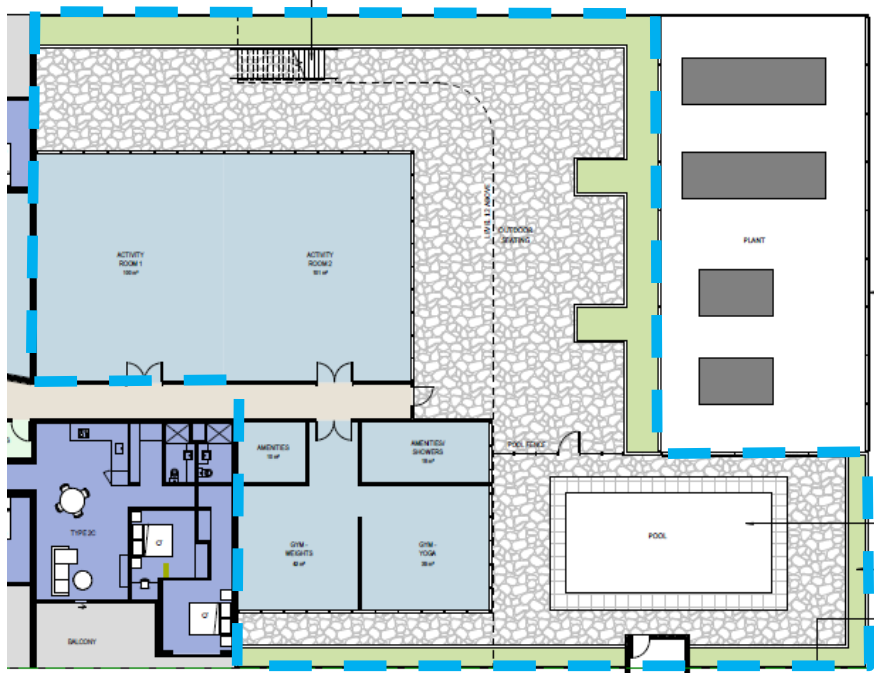
Source: Thomson Adsett

Figure 2 – Reduce private balconies and increased communal recreation spaces on Level 12



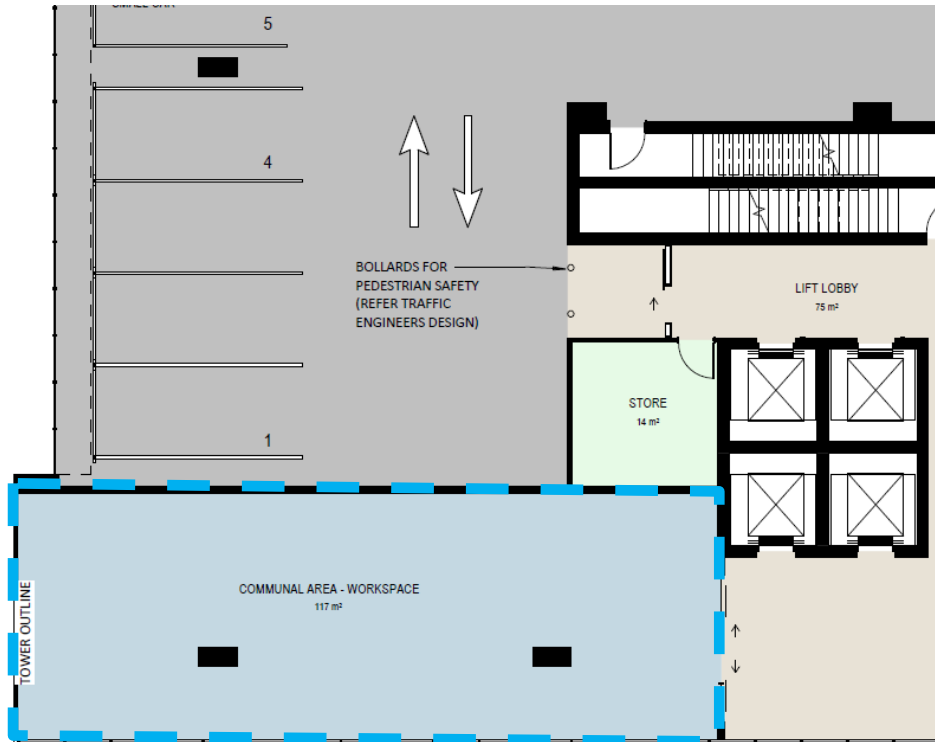
Source: Thomson Adsett

Figure 3 – Removal of one unit and increased communal recreation spaces on Level 11



Source: Thomson Adsett

Figure 4 – Removal of car parking spaces and additional or communal office space for residents on Level 5



Source: Thomson Adsett

2. AIR QUALITY IMPACTS FORM TRANSPORT AIR QUALITY CORRIDOR OVERLAY

“Please submit an air quality report demonstrating the development will minimise impacts from air pollution from vehicle traffic and the ventilation stack on the health and wellbeing of future residents as per section 2.5.9.5 of the development scheme and address the following:

- PO1, PO3 and PO4 of the Transport air quality corridor overlay code;
- PO2 of the Industrial amenity overlay code”

Response:

An air quality report has been prepared by Trinity Consultants, in consultation with EDQ and their air quality advisors. This report has addressed the impacts of both the surrounding road infrastructure (including the Inner-City Bypass) and the nearby Clem 7 Tunnell Ventilation Stack on the residential apartments. A copy of the report is included within **Attachment B**. This reports demonstrates how compliance with the relevant City Plan codes will be achieved.

3. ACCESSIBLE & DIVERSE HOUSING REQUIREMENTS

“i. Provide amended plans demonstrating a minimum of 10% of the total residential GFA is allocated to 3 or more bedroom units as per section 2.5.3 “Housing diversity” of the Development Scheme.”

Response:

The proposed development includes 19 x 3 bedroom apartments, each with an internal gross floor area of 103.6m². This totals 1,937m² of gross floor area within all 3-bedroom apartments. The total gross floor area associated with the multiple dwelling units is 17,247m². Therefore the proposed development complies with Section 2.5.3 of the Bowen Hills PDA Development Scheme.

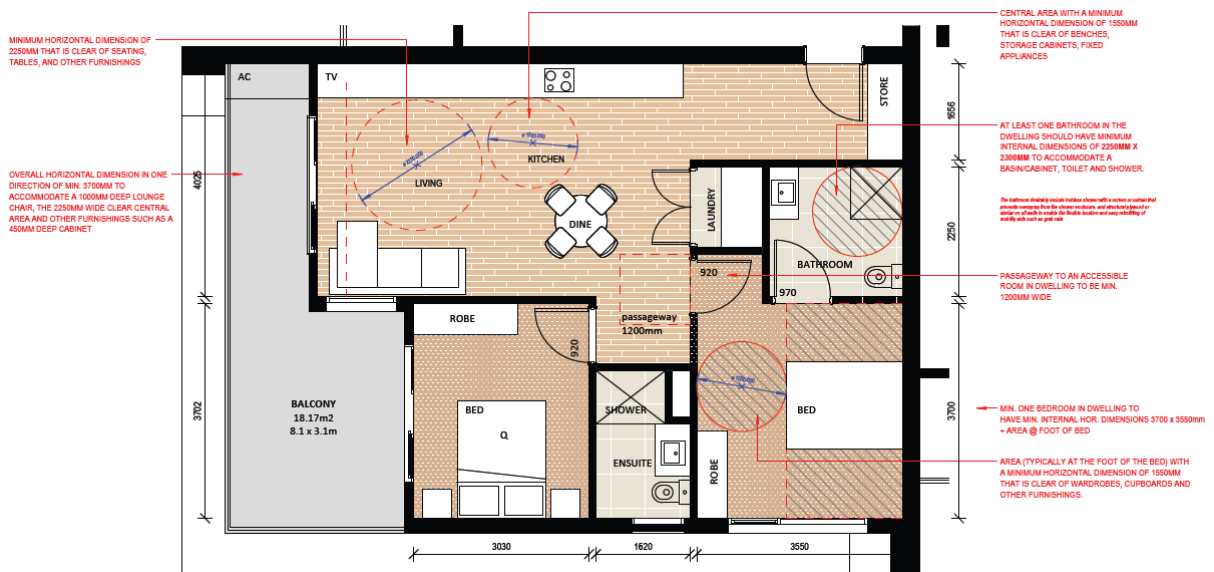
“ii. In addition to this, the planning report states that a minimum of 10% of the dwellings will be adaptable. However, the note on plan no DA04.02 Rev 1 states that “10% of Type A units can be converted to Type 2B units which is in compliance with EDQ Accessible Housing PDA Guideline No.2”. The Guideline states that at least 10% of all dwellings are to be delivered as accessible, not just adaptable. Further, the Guideline states that the type of accessible unit should not be limited to just one dwelling type – it should ideally be equivalent to the proportion of the type of dwelling that represents all dwellings in the development. Submit amended plans to demonstrate a compliant amount of accessible units.”

Response:

The proposed Type 2B apartments are proposed to be configured as apartments which comply with the EDQ Accessible Housing PDA Guideline No. 2 (the Guideline). These are shown in Figure 5 below. A total of 24 Type 2B apartments are proposed. This is equivalent to 10% of all apartments within the project. The proposed development therefore complies with the minimum requirement for adaptable housing.

In addition to the above, an additional 33 Type A apartments are also capable of being configured to comply with the Guideline. This means that additional dwellings can also be provided as adaptable housing if desired by residents in future.

Figure 2 – Extract of accessible floor plan



In relation to the mix of accessible apartment types, it is highlighted that the provision of one type of accessible unit has been accepted in many other projects within the Bowen Hills PDA as being an acceptable outcome.

Furthermore, there has been a significant provision of 1-bedroom accessible apartments provided within the Bowen Hills PDA, with only limited number of other apartment types. This is evidenced through an analysis of four major residential projects in Bowen Hills, noting that in excess of 1500 apartments and 150 accessible apartments have been delivered across these projects. These include:

- Brisbane Showgrounds (The Yards) – all accessible apartments comprise 1 bedroom apartment types;
- Brisbane Showgrounds (Exhibition Quarter Tower 1) – all accessible apartments comprise a mix of 1 bedroom apartments and 3 bedroom apartments;
- Brisbane Showgrounds (The Green) – all accessible apartments comprise a mix of 1 bedroom apartments (approx two-thirds of accessible apartments) and 2 bedroom apartments (approx one - third of accessible apartments); and
- 15 Anderson Street – of the 37 accessible apartments, 35 apartments are 1 bedroom and 2 apartments are two bedroom.

Based on the above, the proposal to deliver 2-bedroom accessible apartments will contribute to a more balanced split of accessible apartments throughout the Bowen Hills PDA. This is a positive outcome and is consistent with the objectives of the Bowen Hills PDA Development Scheme.

4. SUFFICIENT GROUNDS

“The development includes a number of non-compliances (i.e. plot ratio, building height, building setbacks, car parking, communal open space, landscaping etc.). The current sufficient grounds outlined in the Planning Report do not provide satisfactory justification for the non-compliances with the Bowen Hills PDA Development Scheme.

As stated in the Scheme, the sufficient grounds provided are required to address matters of public interest and do not include personal circumstances of an applicant, owner or interested third party. Also, the sufficient grounds should not include aspects that the development is required to comply with under the Scheme, such as the minimum amount of affordable housing.”

Response:

The applicant has changed the proposed development in response to the information request. The extent of any non-compliance with the Bowen Hills PDA development scheme is now very minor. This should be taken into account when considering the sufficient grounds to support the proposed development (i.e. only minor justification should be required).

The proposed development now complies with the development scheme, with the exception of the following matters:

- **Building height** – the proposed building reads as 30 storeys (a compliant outcome). However, the building is technically 33 storeys by definition because of the following:
 - The inclusion of the lower ground level café tenancy facing Campbell Street. This tenancy will contribute significantly to the activation of this frontage and the adjoining bikeway and is therefore a positive addition to the development.

- The inclusion of a mezzanine level above the ground floor. This level is internal only and won't be visible;
- The inclusion of a rooftop bar on level 30, along with communal open space. Given the inclusion of the rooftop bar component, this level is required to be defined as a storey given it is not solely for communal use. The appearance of building height would otherwise be identical if this rooftop was exclusively for communal recreation space.

It is also noted that the 33-storey height is the maximum height of the building measured from the lowest point of the site at the Campbell Street frontage. The height from the highest point of the site will be approximately 6.65m higher, which equates to approximately 2 storeys in actual height.

Based on the above, the proposed building height is identical to a compliant outcome and the extent of any non-compliance is very minor and only technical in nature.

- **Plot ratio** – the applicant has reduced the total development gross floor area in response to this information request. A plot ratio of 8.17:1 is proposed. However, when the gross floor area related to communal open space is excluded, the plot ratio reduces to 8:1 which is compliant with the development scheme.
- **Car Parking** – the Bowen Hills PDA Development Scheme refers to City Plan 2014 in relation to car parking rates. Brisbane City Council recently completed public notification for proposed planning scheme amendments that would remove all minimum car parking requirements for development at this site and impose maximum car parking rates².

The proposed development will provide car parking at a rate of 0.5 spaces per dwelling plus 0.15 spaces per dwelling for visitors. This will be compliant with the proposed new maximum car parking rates that will apply to the site

The proposed car parking will therefore comply with the proposed new car parking rates applicable to this site. The extent of any non-compliance with the Development Scheme is therefore very minor and will resolve in the short term.

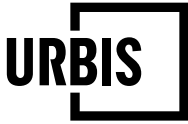
As demonstrated by the above, the extent of any non-compliance with the Development Scheme has largely resolved and is now very minor. In fact, the extent of non-compliance is now so minor that there is arguably no need to demonstrate sufficient grounds to support the approval of this development application.

However, to the extent there is a need for sufficient grounds, the provision of a significant supply of key worker housing (e.g. housing that is affordable for nurses, social workers, disability carers, ambulance offers etc.) near the Royal Brisbane Women's Hospital is more than sufficient to justify the very minor non-compliance with the development scheme.

This is detailed in the Key Worker Housing Assessment included within Attachment C of this response. This analysis has been undertaken in accordance with EDQ Policy, most notably, the recently adopted provisions of the *Economic Development (Affordable Housing) Amendment Regulation 2024* which sets out how it will be determined that key worker housing is being delivered. Based on the analysis contained within this report, 51% of the new apartments will be affordable for key worker households. This represents an additional 124 dwellings available for key workers within the Bowen Hills PDA.

It is emphasised that the applicant is not proposing that 51% of the proposed dwellings are to be used exclusively for key worker housing as part of the sufficient grounds package. The intent of the analysis

² <https://www.brisbane.qld.gov.au/planning-and-building/planning-guidelines-and-tools/brisbane-city-plan-2014/amendments-to-city-plan-2014/city-plan-amendments-in-progress/proposed-citywide-amendment-inner-city-affordability-initiative>



has been to identify that, based on the design and location of the proposed dwelling types, the project will naturally deliver a substantial component of apartments which can be affordably rented by key worker households based on market value rents.

The proposal represents an exemplar approach to the delivery of key worker housing supply within the Bowen Hills PDA. It provides a broad mix of apartment types, including smaller furnished studio apartments which will be suitable to rent by key workers looking for shorter term accommodation, and also more standard unfurnished apartments suitable for longer term occupancy. This, coupled with the location of the site immediately adjacent to one of the largest employers of key workers in the State (approximately 13,000 people work within the Herston Health Precinct), results in this project delivering a substantial public benefit by providing much needed housing for key workers.

5. NETWORK PLAN

“The development results in a gross floor area (GFA) which exceeds the maximum plot ratio identified for the site in the Development Scheme. Provide a Services Advice Notice (SAN) to ensure the additional demand can be accommodated by the existing infrastructure/services.”

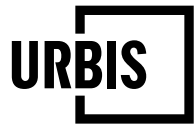
Response:

A copy of the Service Advice Notice is provided in **Attachment E**. This confirms that there is adequate capacity within the broader infrastructure network to accommodate the additional demand associated with the proposed development.

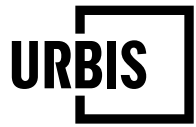
Yours sincerely,

A handwritten signature in black ink, appearing to read "M. Cattoni".

Michael Cattoni
Director
+61 7 3007 3850
mcattoni@urbis.com.au



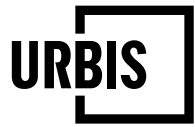
ATTACHMENT A – AMENDED DEVELOPMENT SCHEDULE



ATTACHMENT B – AIR QUALITY ASSESSMENT REPORT



ATTACHMENT C – KEY WORKER HOUSING ASSESSMENT



ATTACHMENT D – SERVICES ADVICE NOTICE