



Date: 12 June 2025
Our Reference: J001451
Your Reference: DEV2024/1507

Attn: Jennifer Davison

Economic Development Queensland
GPO Box 2202
Brisbane, Queensland 4001

Dear Jennifer,

Site Address:	332-334 Water Street and 30A Trinity Street, Fortitude Valley QLD 4006
Property Description:	Lot 1 on RP10553, Lot 11 and Lot 12 on RP10552, Lot 5, Lot 6 and Lot 94 on SP266307, Lot 13 on RP81335, Lot 955 on SP206840 and Easement A on SP143465
Method of Distribution:	Email [Jennifer.Davison@edq.qld.gov.au & Peita.McCulloch@edq.qld.gov.au]
Correspondence Subject:	Response to Information Request Pursuant to s.83(1) of the <i>Economic Development Act 2012</i> & Changing Application Pursuant to s.92 of the <i>Economic Development Act 2012</i>

We write on behalf of *Pellicano Living Pty Ltd* ("the Applicant") in relation to the abovementioned PDA Development Application for Material Change of Use, involving Multiple Dwelling, Short Term Accommodation and Centre Activities (Food and Drink Outlet, Office and Shop)

On 3 September 2024, an Information Request was issued by Economic Development Queensland (EDQ) as the assessment manager, pursuant to Section 83(1) of the Economic Development Act 2012 ("the Act"). Please refer below for the applicant's formal response to the Information Request. This response addresses the following items:-

- Notice of a Change Application pursuant to s.92 of the Economic Development Act;
- Context for proposed change; and
- Formal response to EDQ's Information Request.

This information request response is to be considered in conjunction with the following detailed attachments:

- Attachment 1 - Information Request prepared by Economic Development Queensland;
- Attachment 2 - Amended Proposal Plans prepared by Woods Bagot; and
- Attachment 3 - Civil Engineering Response prepared by Burchills Engineering Solutions.

PROPOSED CHANGE IN ACCORDANCE WITH SECTION 92 OF THE ECONOMIC DEVELOPMENT ACT

We write on behalf of Pellicano Living Pty Ltd ("the Applicant") regarding the abovementioned development application which seeks approval for the following aspects of development:-

- PDA Development Permit for a Material Change of Use, involving Multiple Dwelling (453 units), Short Term Accommodation (104 units), and Centre Activities (Food & Drink Outlet, Office and Shop).

Pursuant to section 92 of the Economic Development Act 2012, the applicant proposes to make a change to the development application currently under assessment by the Minister for Economic Development Queensland ("the Assessment Manager").

Context for Proposed Change

Following receipt of EDQ's Information Request / Further Issues Letter and a series of collaborative meetings with EDQ planning officers, it was confirmed that a substantial redesign was required at the plaza level to better align with the urban design intent of the Bowen Hills PDA Development Scheme.

This feedback was received constructively and in good faith by the applicant, who has since undertaken extensive coordination with the consultant team to resolve key design issues and deliver a superior built outcome that responds directly to EDQ's requirements.

As a result, the applicant has committed to a comprehensive redesign of the plaza level, focused on enhancing public realm outcomes and urban integration. Key improvements include:

- Relocation of the communal recreation area (including the pool) to the rooftops, removing its dominance at ground level and allowing the civic plaza to function as a more open, engaging, and community-focused space;
- Delivery of a generous, publicly accessible and legible civic plaza that supports cultural activity, activation, and community interaction;
- Introduction of two publicly accessible, CPTED-compliant cross-block links, providing clear and safe pedestrian connections from Water and Brunswick Streets into the civic plaza; and
- Improved wayfinding, accessibility, and active frontages along key pedestrian pathways and enhanced sightlines and visual corridors throughout the site.

These enhancements are the result of a collaborative redesign effort and align strongly with EDQ's place-making vision for the Bowen Hills PDA.

However, to achieve these changes, key design elements—particularly communal open space—have been shifted vertically within the development. The communal recreation areas, originally proposed at podium level, have now been relocated to the rooftops of both towers. While this approach is fully supported from an urban design and amenity perspective, it has necessitated a recalibration of the project's feasibility model.

To maintain the project's economic viability—and support timely delivery of a high-quality, market-ready development—the applicant is seeking to incorporate an additional seven (7) storeys for the Water Street and Brunswick Street towers. The resulting building heights are as follows:

- Brunswick Street tower: 37 storeys (previously 30)
- Water Street tower: 38 storeys (previously 31)

This change equates to a modest but essential increase in residential yield within the larger development, with 80 additional units, bringing the total proposed dwellings to 557 across both towers:

- Brunswick Street tower: 288 units (184 MUD / 104 STA)
- Water Street tower: 269 units (269 MUD / 0 STA)

This adjustment is critical to ensuring the commercial feasibility of the development, while simultaneously delivering the suite of design outcomes aligned with the Bowen Hills PDA Development Scheme. The proposed change is a direct response to EDQ's collaborative feedback process and is driven by a shared objective of delivering a viable, high-quality, and deliverable mixed-use development.

Finally, we reiterate that the applicant is fully committed to progressing this project to construction upon approval, contributing to housing supply, activation, and urban renewal within the Bowen Hills PDA.

Further Detail & Sufficient Grounds

Further detail in support of the proposed change will be provided in the applicant's formal Response to Further Issues Letter issued by Economic Development Queensland (EDQ) on 16 September 2024. This response will include:

- A comprehensive Design Report outlining the evolution of the design, rationale for changes, and how the revised built form delivers enhanced urban design and public realm outcomes;
- Updated Landscape Concept Plans illustrating key improvements to open space provision, pedestrian connectivity, and plaza functionality; and
- A full suite of updated technical reports that address all relevant planning, engineering, and urban design considerations.

Importantly, the Response will also incorporate a detailed sufficient grounds argument prepared in accordance with Section 2.2.3 of the Bowen Hills PDA Development Scheme, demonstrating that the proposed increase in building height is justified on the basis of superior design outcomes at the plaza level. These outcomes clearly exceed the standard provisions and requirements of the Development Scheme—particularly with respect to place-making, public realm activation, pedestrian connectivity, and architectural quality. The revised design scheme constitutes a performance-led response that aligns with the strategic intent and overarching vision for the Bowen Hills PDA.

PROPOSED CHANGES IN RESPONSE TO INFORMATION REQUEST

Following receipt of EDQ's Information Request dated 3 September 2024, the applicant and consultant team have reconsidered key aspects of the proposal. The following changes have been made to address EDQ's feedback and enhance alignment with the Bowen Hills PDA Development Scheme:

- Relocation of the communal recreation area (including the swimming pool) to the rooftop levels of both towers, removing its dominant presence from the ground plane and enabling the civic plaza to function as a generous and engaging public space.
- Redesign of the civic plaza to deliver a more generous, legible, and publicly accessible urban space that supports social interaction, community activities, and cultural events.
- Incorporation of two (2) publicly accessible cross-block links providing generous, accessible and CPTED-compliant pedestrian connections from both Water Street and Brunswick Street to the civic plaza, improving permeability and public movement through the site.
- Enhanced pedestrian legibility, connectivity and wayfinding, including:
 - Connection from the lower-level vehicular drop-off to the public plaza and building lobbies.
 - Continuous movement from the prominent Brunswick/Water Street corner into the civic plaza.
 - North boundary cross-block link from Brunswick Street through to the plaza.
- Activation of the public realm through active frontages along both cross-block links, and improved visual sightlines and permeability across the site, including views through to the adjoining Heritage Precinct.
- Addition of seven (7) storeys respectively to each tower, resulting in a revised built form of:
 - Brunswick Street tower: 37 storeys
 - Water Street tower: 38 storeys
- An increase in residential yield, resulting in a total of [80] new apartments across both towers:
 - Brunswick Street tower: 288 units (184 MUD / 104 STA)
 - Water Street tower: 269 units (269 MUD / 0 STA)

INFORMATION REQUEST RESPONSE

1. Geotechnical Site Investigation Report

Provide a Geotechnical Site Investigation Report, certified by a registered professional engineer Queensland (RPEQ) specialised in geotechnical engineering according to Australian Standard "AS1726 Geotechnical Site Investigation".

Applicant's Response:

Please refer Attachment 3 – Civil Engineering Response prepared by Burchills Engineering Solutions.

2. Flood Assessment Report

Provide a Flood Assessment Report, certified by a suitably qualified RPEQ, which demonstrates the flood impacts on the subject site, including the overflow path and any impact on the proposed development.

Applicant's Response:

Please refer Attachment 3 – Civil Engineering Response prepared by Burchills Engineering Solutions.

SUMMARY

In accordance with section 83B(2)(b) of the Economic Development Act 2012, this correspondence comprises the full response to the information request issued by the assessment manager. As such, we respectfully request that the assessment manager now issue a Notice of Compliance, enabling the applicant to proceed to the public notification stage of the development assessment process.

Whilst we trust this information is sufficient to enable you to progress with the assessment of this development application, should you have any queries, please do not hesitate to contact Sam Spiro or the undersigned on 07 3254 1566.

Yours faithfully,
Property Projects Australia Pty Ltd



Jesse Govender
Principal Planner