26 February 2025

Our Ref: 23BRT0683
MEDQ Ref: DEV2021/1193/3

Attention: Mark Clayton

Urbicus Pty Ltd
110 Kennedy Terrace
Paddington QLD 4068

Dear Mark,

RE: Proposed Build-to-Rent Development, 19-25 Campbell Street, Bowen Hills
Response to EDQ Further Issues (DEV2021/1193/3)

I refer to the Further Issues (FI) letter received from Economic Development Queensland (EDQ), dated 10 January 2025, in relation to a proposed build-to-rent development to be located at 19-25 Campbell Street, Bowen Hills (subject site). In response to the items raised regard traffic, Colliers has attended 2 meetings with EDQ. Firstly, on the 30th of January as part of the wider consulting group and again on the 4th of February 2025 to provide more detailed discussion on traffic and parking.

Following these discussions, we have prepared responses to the relevant transport engineering-related items, being FI Items 9 to 11. In response to the FI Letter, the architectural plans have been revised by nettletontribe, and will be submitted with the town planning response to EDQ.

EDQ FI Item 9c – Servicing Arrangements

The location and orientation of the loading bay requires for heavy vehicles to reverse up to the car parking driveway to the podium. Although it is acknowledged that its orientation is similar to the previous approval, the extent of its reversal onto the podium ramp is worsened by the proposed amendments. Further clarification is sought to ensure that the safety of all users is not compromised.

i) Demonstrate strategies utilised to manage conflict between cars exiting the podium car parking and manoeuvring heavy vehicles (e.g. convex mirrors, etc.).

Colliers Response to EDQ FI Item 9c

The swept path and height clearance analysis or service vehicles was demonstrated in drawings 23BRT0683-01, 23BRT0683-02 and 23BRT0683-03, which have been resubmitted in Appendix A. It is acknowledged that these vehicles on exiting the loading bay will encroach on the 1:25 transition at the base of the carpark ramp, however they will not need to manoeuvre onto the main section of ramp.

Service vehicle movements are expected to be infrequent at approximately 1 per day and the reverse manoeuvre towards the podium ramp would be completed within 10-15 seconds. All vehicles operating through this point would also be travelling at low speeds. Additionally, as shown in Figure 1, vehicles are expected to stand at the security gate as it opens on exit. From this standing point, clear sight distance to a service vehicle is provided. As such, conflict between exiting cars and reversing service vehicles is expected generally resolved by these arrangements.

However, to account for all potential operation scenarios, including if the security gate is already open, it is proposed that a convex mirror is provided as a secondary element, for sight distance as per Figure 1.

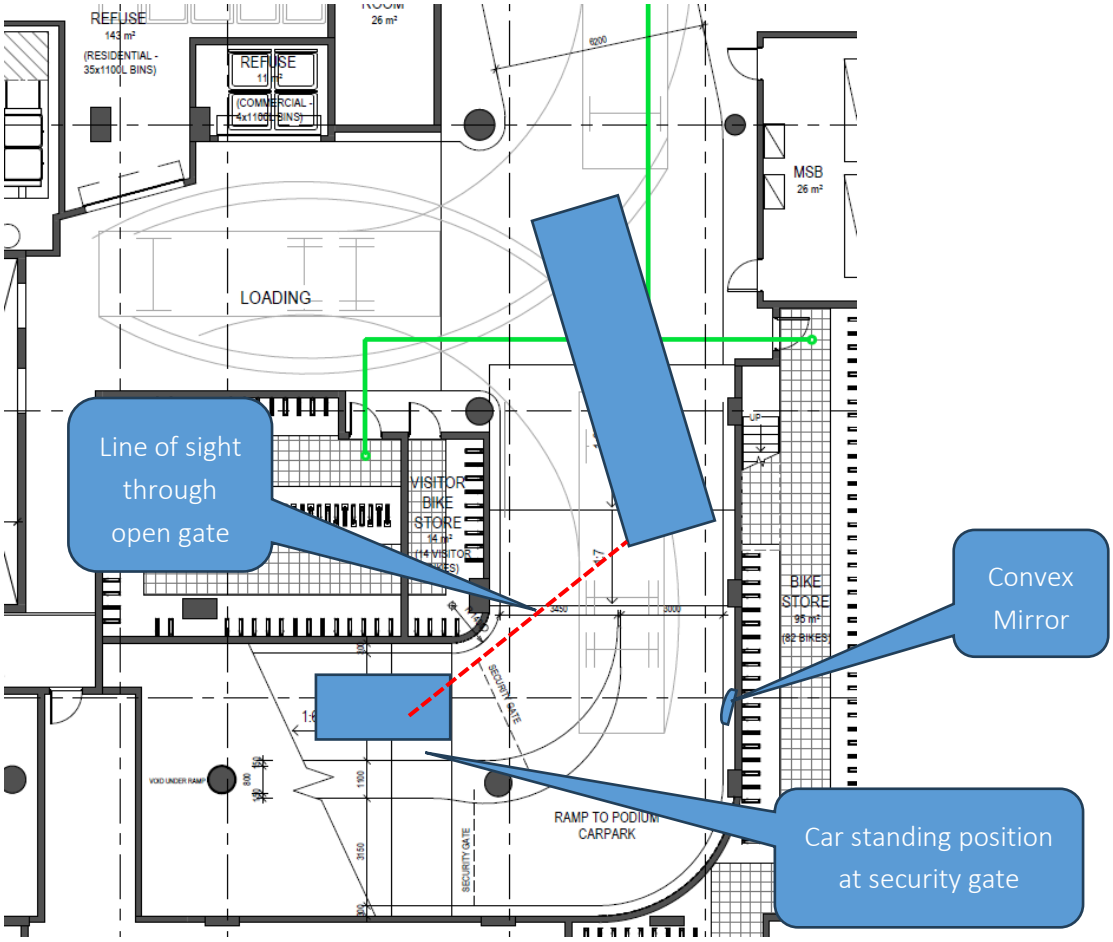


Figure 1: Convex Mirror Location

EDQ FI Item 10a – Car Parking

As stated in Section 3.4 of the Transport Engineering Report, prepared by TTM (Revision No. 1, dated 23 August 2024), there is a limited supply of kerbside parking within the surrounding road network. Furthermore, the amendments to the number of car parking spaces provided within the development for both tenants and visitors does not comply with the requirements of the Bowen Hills Development Scheme, and although Section 5.1.1 of the report mentions the changes to the City Frame/City Core boundaries, this is ultimately irrelevant to the calculation of the required car parking spaces for both residents and visitors as the Development Scheme specifies car parking rate provisions for multiple dwellings. EDQ also highlights that the submissions received during the notification period have consistently expressed strong sentiments and a significant level of concern regarding the proposed car parking rate, therefore this issue must be addressed.

It is the expectation that the development is able to provide sufficient parking for residents, employees, customers and visitors on site so that it does not negatively impact on adjoining sites or the quality and amenity of the streetscape.

i) Submit amended architectural plans and the Transport Engineering Report demonstrating a maximum reduced car parking rate of 0.50.

ii) Submit an amended Transport Engineering Report addressing the potential impacts of the reduced car parking rate on the surrounding road network, the available on-street parking, as well as the potential nuisance this could cause.

Colliers Response to EDQ FI Item 10a

Previous Colliers reporting, including a detailed technical note advice letter provided subsequent to pre-lodgement (dated 23 August 2024), provided significant commentary discussing the typical characteristics of build-to-rent developments as well as the existing conditions of the surrounding road network / area. These same discussions have been provided to Brisbane City Council and EDQ for a range of inner urban, high density, build to rent residential developments. This has resulted in numerous approvals through areas such as Bowen Hills, Fortitude Valley, South Brisbane and Toowong providing build to rent uses with parking rates below 0.5 space pe unit, inclusive of visitor parking. The lowest rate approved is at 186 Wickham Street, Fortitude Vally, under Council approval A006265400, which provided parking at a rate of 0.34 spaces per unit, including 0.15 space per unit for visitors and 0.19 spaces per unit for residents.

The fundamentals of these operational parameters include:

- Target market is primarily non-car operating households.
- Unit sizes promote low average dwelling occupancies – with 65% studio or 1 bedroom, 28% 2 bedroom and 7% 3 bedroom. This will primarily house single people or couples with high mobility independent of a private vehicle.

- Primary trip mode splits are via major public transport infrastructure (Bowen Hills railway station) and major employment/activity nodes (Brisbane CBD, Fortitude Valley, Newstead).
- Decoupling of parking from leases directly identifies the cost of owning and garaging a car, further promoting low car ownership
- No viable on-street parking is available – all local on-street parking is controlled and therefore a resident car either needs to be parked on-site, parked on-street over 1km away or risk a daily parking fine. (Note that Council does not provide resident parking permits for new developments after March 2015).

The underlying message is that if a resident wishes to live in this building and operate car they must lease a space, there is no viable option to park on the street.

To support most residents living without car ownership, the proposal allows for up to 35 parking spaces to be provided as dedicated car share. The managed operation of the car park will allow parking spaces to be allocated to car share or residents as demand dictates. Research by Colliers suggest that in highly accessible areas, car share schemes can confidently commence operation at a rate of 1 space per 100 units. As such, 5 spaces would initially be dedicated to car share. If the demand for this scheme is adequate, and parking leasing is low, additional spaces can be dedicated to the car share operation.

Other jurisdictions have typically identify that a car share space can cater for an equivalent demand of between 4 and 12 parking spaces. Allowing for a conservative equivalency of 1 share car replacing 5 standard bays, the allowance of up to 35 bays would provide and equivalent of 175 spaces, plus the remaining 149 space provision. This would be an equivalency of 324 spaces or 0.75 space per unit.

There are also noted examples within the local area of lower parking provisions. The earliest of these, for which Colliers (formerly TTM) provided the traffic assessment reports, was at 24 Brookes Street, Bowen Hills. While this was a significantly smaller scale development, at 36 units, similar principles were identified. Most significantly, that the target market included households with no private vehicle ownership and that any overflow car parking could not be catered for on-street in the surrounding area. This was approved by EDQ, under application DEV2010/042 for 14 parking space, being 0.39 space per unit.

Colliers has also interrogated the ABS data for car ownership in the area. The data for apartment buildings in Bowen Hills has been complied identifying car ownership by dwelling size. In is noted that this includes all apartment developments, regardless of age. As such, it includes apartment buildings with higher parking provision and older complexes where parking permits may be issued.

Table 1: ABS Parking Data per Apartment in Bowen Hills

Beds	No motor vehicles	One motor vehicle	Two motor vehicles	Three motor vehicles	Four or more motor vehicles	Total	Average
None (studio)	76	10	0	0	0	92	0.12
One bedroom	459	543	50	0	0	1061	0.61
Two bedrooms	179	678	210	15	8	1081	1.08
Three bedrooms	12	54	38	4	0	110	1.31
Total	729	1280	300	23	19	2342	0.86

This data identifies that occupants of studio apartments (15% of the proposed development) rarely own cars. Further, that 43% of 1 bedroom units, 16% of 2 bedroom units and 11% of 3 bedroom units have zero car ownership. It is also noted that 60% of 3 bedroom units and 79% of 2 bedroom dwelling operate 1, or less, cars.

Colliers acknowledges that there is traditional public perspective that every household operates at least 1 car and that the parking for these cars must be accommodated on-site. However, this view is both unsustainable and untrue. As per the ABS data, there is already a significant demand in Bowen Hills for residential dwellings with 1 or zero parking spaces. Even for large 2 and 3 bedroom units, the majority of households in the area do not operate with more than 1 vehicle. It is also expected that as inner areas of Brisbane continue to develop and public and active transport infrastructure improves, demand for

In summary, the build to rent product in this location:

- Targets low car ownership
- Promotes low car ownership through pricing structure of leases
- Enables low car ownership with accessibility to transport and car share, and
- Is restricted to low car ownership by lack of alternative parking

As such, the parking solution provided is not expected to have any adverse impact or nuisance on the local on-street parking provisions.

EDQ FI Item 10b – Car Parking

Section 4.1 of the Transport Engineering Report references retail tenancy GFA that is inconsistent with the submitted architectural plans.

i) Submit an updated Transport Engineering Report referencing a retail tenancy GFA that is consistent with the architectural plans.

Colliers Response to EDQ FI Item 10b

Previous Colliers reporting referenced a retail GFA of 225m^2, which excluded a third tenancy. Architectural plans, prepared by Nettletontribe, identify a total retail GFA of 371m^2.

However, this change in retail GFA does not have an impact on any of the assessments undertaken:

- The corresponding car parking requirement does not change (given a maximum is applicable) and bicycle parking is not required for retail uses with less than 1,000m^2.
- The design service vehicles do not change – for a retail land use, both GFAs fall into the "200-599m^2 GFA" range, when determining the number of service bays required.
- While the land use does not have dedicated on-site car parking, there may be a small element of short-term on-street car parking (or potentially within the on-site loading bay if unoccupied) associated. As a result, there may be a small number of additional traffic volumes in the surrounding road network. However, as outlined by Colliers DA reporting, the reduction in on-site car parking (for the residential land use) means that the proposed development's traffic generation is significantly reduced from that of the approved development.

It is also note that the development replaces several hundred square meters of non residential development which have house showrooms, commercial and industrial uses. The incidental parking impact of the proposal is expected to be a reduction compared to these existing uses.

EDQ FI Item 10c – Car Parking

Given that one of the approved land uses for the site is for a Food and Drink Outlet, it is unclear how food delivery services (i.e. UberEats, Doordash, Deliveroo, etc.). will be managed/provided without disrupting the operation of the adjoining road network and footpaths.

i) Submit an updated Transport Engineering Report demonstrating the management of food delivery services.

Colliers Response to EDQ FI Item 10c

There are several options for delivery drivers to access the site. Firstly it is noted that the loading bay will typically be unoccupied in the evening when these types of trips peak and drivers may make use of these facilities. It is also noted that the development includes provision of a 6m wide land dedication on the Campbell Street frontage, which will allow a correlating pavement widening of Campbell Street. This significant improvement to the Campbell Street cross section is expected to allow for additional kerbside facilities in the vicinity of the site which will, particularly in off peak periods, allow for these movements to be catered for within the improved road environment.

EDQ FI Item 10d – Car Parking

Section 5.1.1 of the Transport Engineering Report indicates that there are 134 car spaces dedicated for resident car parking and 51 car spaces dedicated to visitor car parking. The submitted architectural plans does not reflect this and it is unclear which car spaces are for residents versus visitors.

i) Submit amended plans delineating car spaces dedicated to residents and visitors.

Colliers Response to EDQ FI Item 10d

Revised architectural plans, prepared by Nettletontribe, are provided in Attachment A.

These plans identify the user designations for each space:

- 51 visitor spaces are provided in the basement car park.
- 134 resident car spaces are provided across the podium (111) and basement (23) car parks.

EDQ FI Item 10e – Car Parking

Section 5.1.3 of the Transport Engineering Report identifies that the Building Code of Australia (BCA) does not require PWD car parking for Class 2 buildings, the assessment benchmark for this amendment application is the Bowen Hills Development Scheme, which references the City Plan 2014's Transport, access, parking and servicing planning scheme policy (TAPS PSP).

Under the TAPS PSP, the development must provide PWD car parking spaces at a rate of 1 space per 50 ordinary parking spaces, with a minimum provision requirement of 1 space. Given that the BCA is not an assessment benchmark for this application, the 'ordinary parking spaces' in this instance applies to the entire supply of car parking spaces, and with the current proposal of 185 car parking spaces, the development is therefore required to provide a minimum of four (4) PWD car parking spaces.

i) Submit amended Architectural Plans and Transport Engineering Report demonstrating compliance with the PWD car parking space requirements within TAPS PSP.

Colliers Response to EDQ FI Item 10e

Revised architectural plans, prepared by Nettletontribe, are provided in Attachment A.

The basement car park has been amended to include a total of four (4) persons with a disability (PWD) car spaces.

EDQ FI Item 11a – Cycle Access

The drawing titled B01 GA PLAN (prepared by Nettleton tribe, Drawing No. 11703_DD1102, Issue 6, dated 16 August 2024) shows three (3) proposed visitor bicycle spaces on the south-east corner of the basement, which abuts a motorcycle parking space, small car space and the mech plant. It is unclear from the submitted plans how the three (3) visitor bicycle spaces are safely accessed by users, particularly with occupied motorcycle space/s.

i) Demonstrate compliant access to the three (3) proposed visitor bike spaces located behind the proposed motorbike spaces. Include the dimensioned plans (the current plans could be dimensioned) with the motorcycle bays all occupied.

Colliers Response to EDQ FI Item 11a

Revised architectural plans, prepared by Nettletontribe, are provided in Attachment A.

The three (3) bicycle spaces identified in the basement car park have been relocated, to eliminate conflict with the adjacent motorcycle parking in the south-east corner.

EDQ FI Item 11b – Cycle Access

Hazard-free access to end of trip facilities / bicycle parking is unclear and further information is required to demonstrate that pedestrian / cyclist movement by both residents and visitors will be managed to reduce hazards and conflicts with vehicles. Submit amended plans showing the provision of equitable pedestrian and cyclist access for:

i) The bike store / visitor bike store located at ground level, adjoining the loading bay, and

ii) In Levels 1 and 2 (podium), particularly from the lifts.

Colliers Response to EDQ FI Item 11b

Revised architectural plans, prepared by Nettletontribe, are provided in Attachment A.

These plans identify wayfinding linemarking guiding cyclists to the ground level and podium bicycle parking (including stores), from the Edgar Street vehicle access and lift core respectively.

Summary

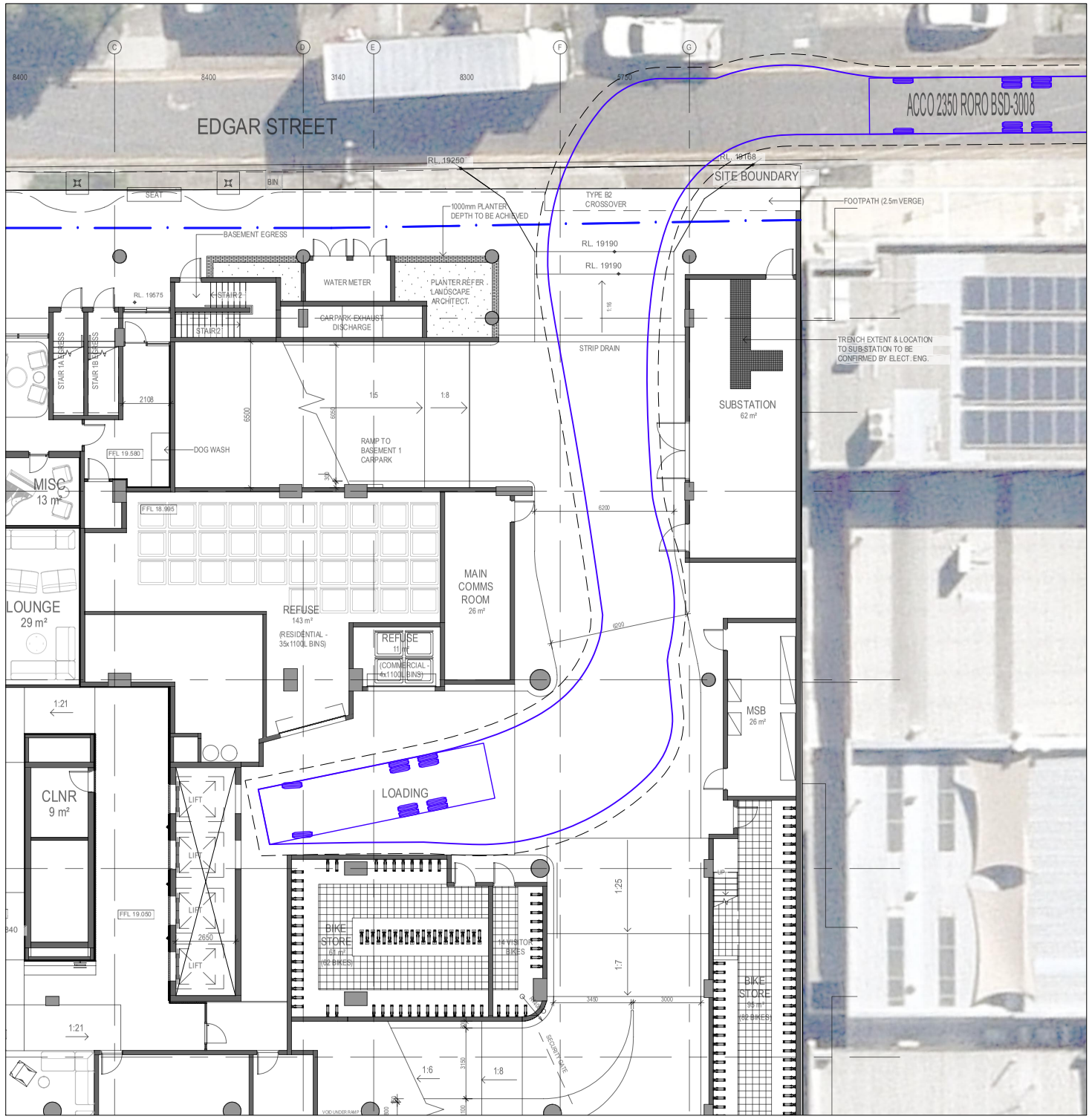
This advice provides a response to the relevant transport-related items contained within EDQ's FI letter, dated 10 January 2025.

The revised architectural plans and provided responses are considered to adequately address the relevant transport-related FI items.

Yours sincerely,

Simon Crank
Director
RPEQ: 18360
Colliers International Engineering & Design (TTMC) Pty Ltd

Attachment A Access Analysis to Service Area



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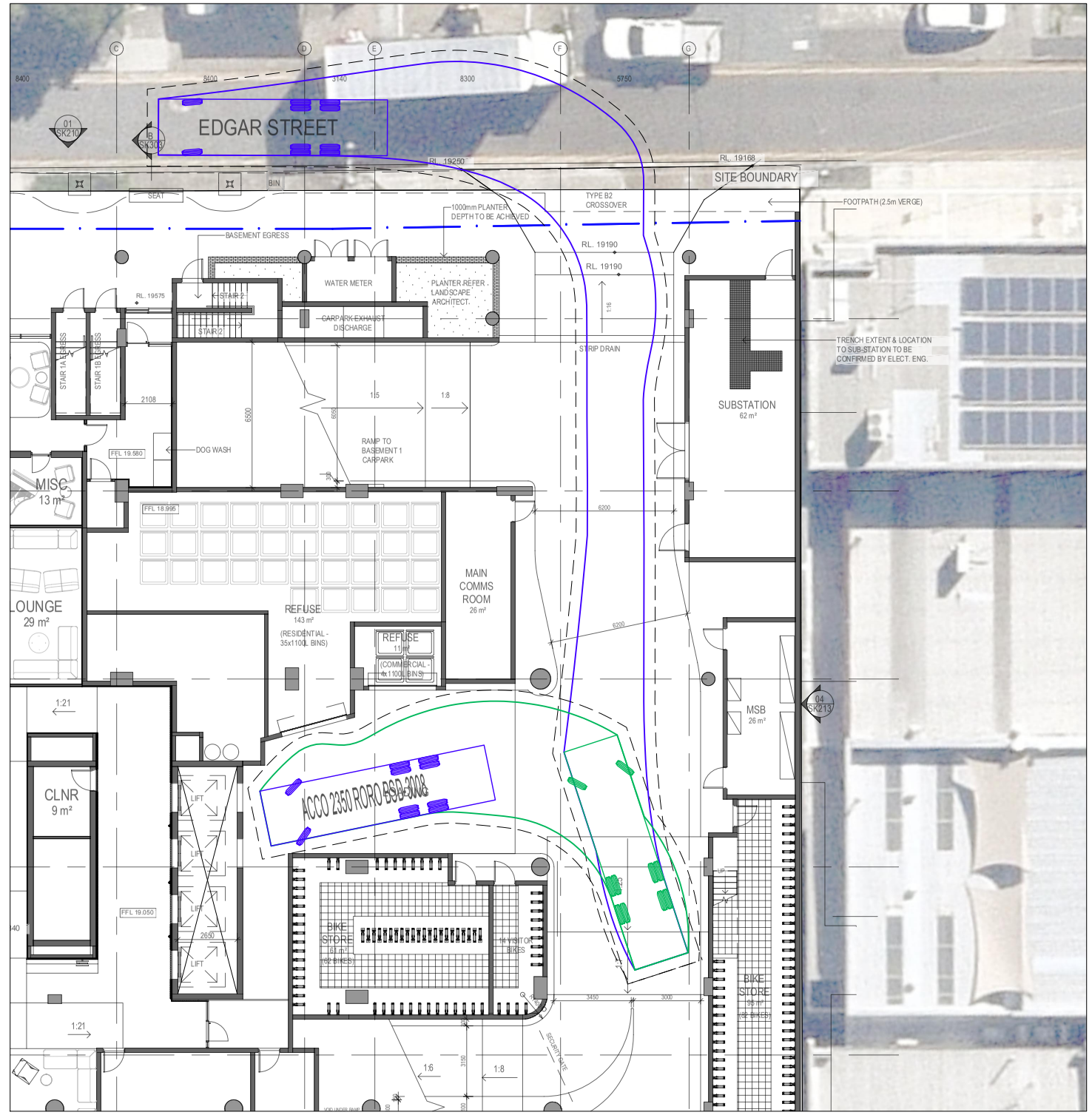

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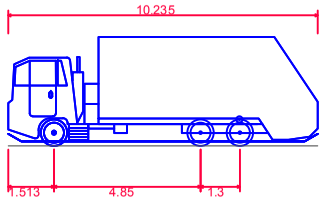
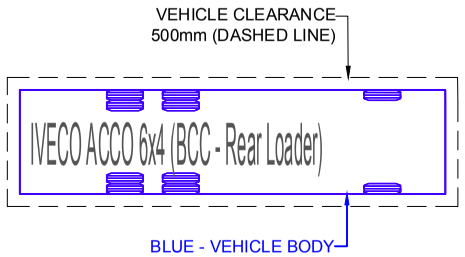


BCC Fleet 2020 (Rear Loader)

Overall Length	10.235m
Overall Width	2.500m
Overall Body Height	3.600m
Min Body Ground Clearance	0.150m
Track Width	2.500m
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	9.757m
Design Speed Forward	5.0km/h
Clearance Envelope	0.500m



DIRECTOR

SIMON CRANK RPEQ 18360

APPROVED 19 Aug 2024

REV.	DATE	AMENDMENT DESCRIPTION	DRAWN	CHECKED	APPROVED
C	19.08.24	1 IN 25 RAMP TRANSITION ADDED	DSF	RBe	SC
B	08.08.24	1 IN 25 RAMP TRANSITION ADDED	DSF	RBe	SC
A	06.08.24	ORIGINAL ISSUE	BV	RBe	SC

SCALE 0 2.5 5 7.5 10 12.5m

SCALE 1:250 AT ORIGINAL SIZE

NORTH

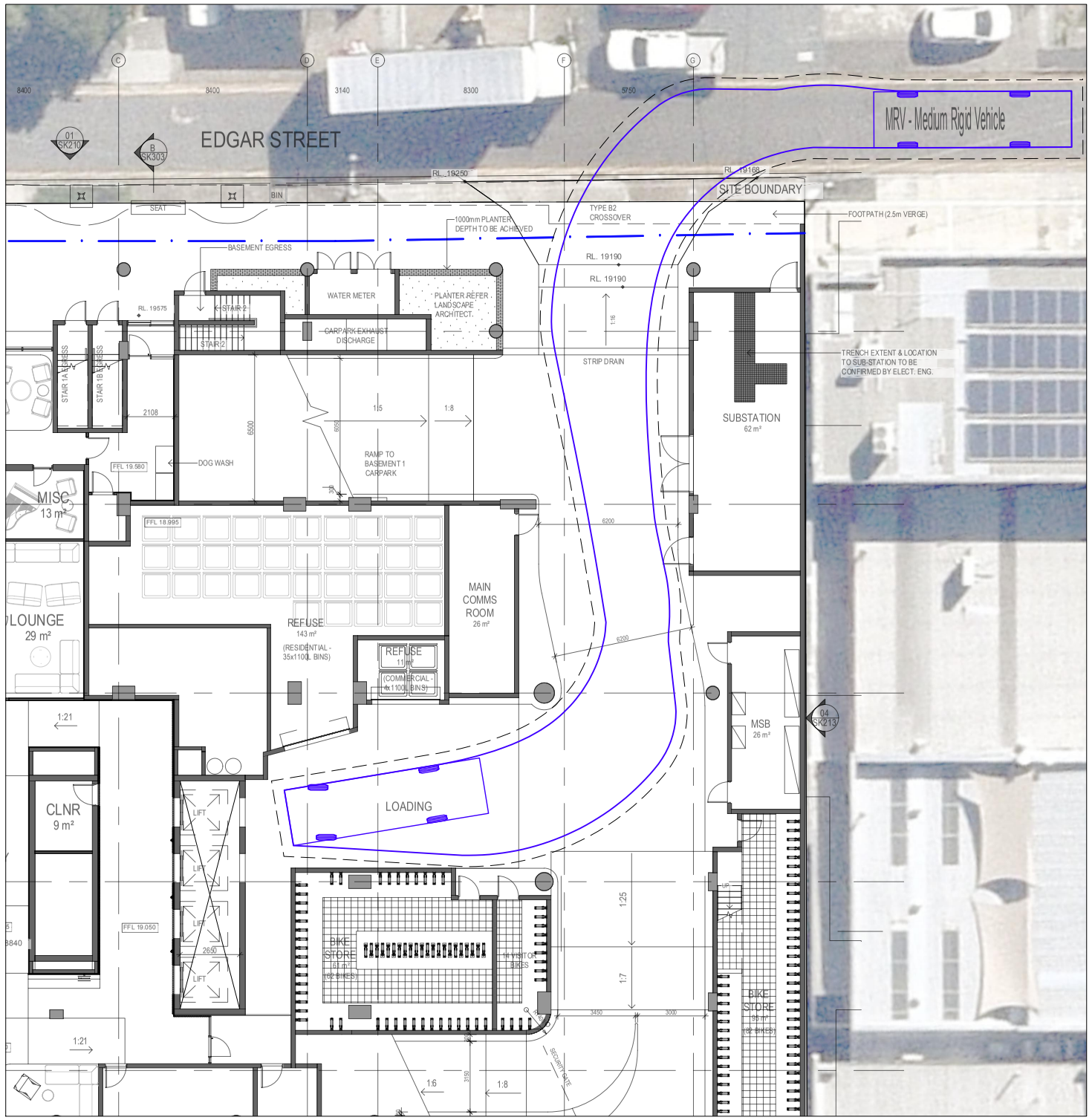
CLIENT: City Developments Limited

TTM CONSULTING PTY LTD
ABN 65 010 868 621
LEVEL 8, 369 Ann Street, BRISBANE QLD 4000
P.O. BOX 12015, BRISBANE QLD 4003
T: (07) 3327 9500 F: (07) 3327 9501
E: ttmbris@ttmgroup.com.au W: www.ttmgroup.com.au

PROJECT: **19 Campbell Street, Bowen Hills**

DRAWING TITLE: **SWEPT PATH ANALYSIS**
10.235m Rear-loader RCV - DESIGN VEHICLE

PROJECT NUMBER	23BRT0683
ORIGINAL SIZE	A3
DRAWING NUMBER	23BRT0683-01
REVISION	C
DATE	19 Aug 2024
SHEET	1 OF 1



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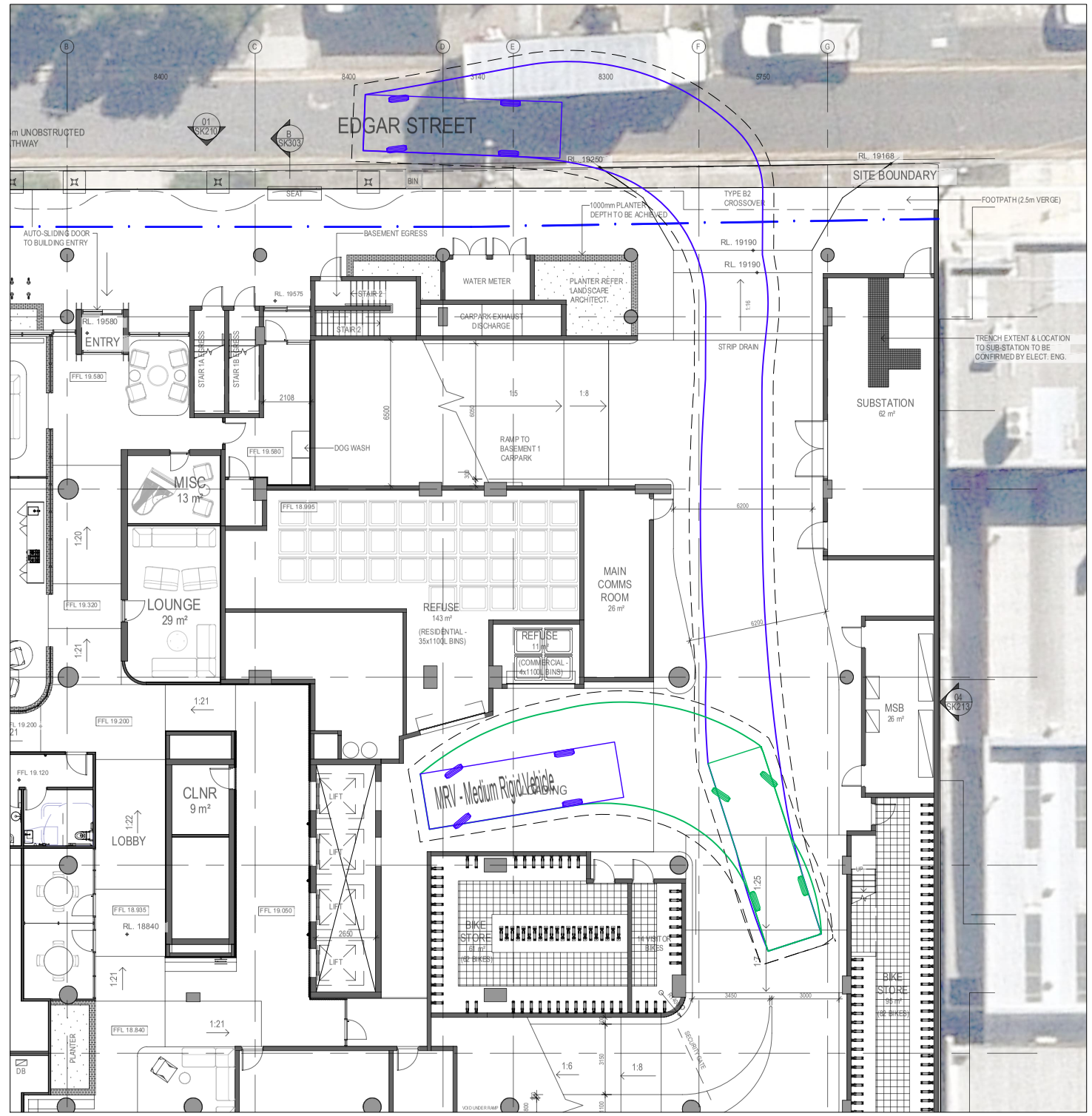
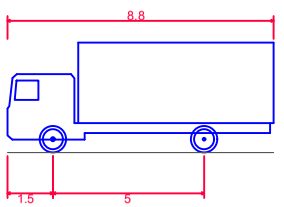
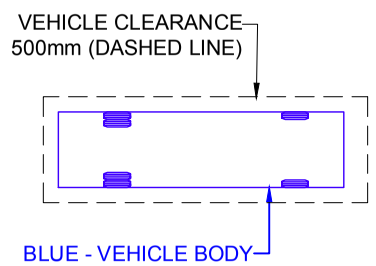


FORWARD OUT EXIT MOVEMENT



MRV - Medium Rigid Vehicle

Overall Length	8.800m
Overall Width	2.500m
Overall Body Height	3.633m
Min Body Ground Clearance	0.428m
Track Width	2.500m
Lock-to-lock time	4.00s
Curb to Curb Turning Radius	10.000m
Design Speed Forward	5.0km/h
Clearance Envelope	0.500m



PRELIMINARY ADVICE ONLY

19 August 2024

REV.	DATE	AMENDMENT DESCRIPTION	DRAWN	CHECKED	APPROVED
C	19.08.24	REVISED ARCHITECTURAL BASE	DSF	RBe	SC
B	08.08.24	1 IN 25 RAMP TRANSITION ADDED	DSF	RBe	SC
A	06.08.24	ORIGINAL ISSUE	BV	RBe	SC

SCALE 0 2.5 5 7.5 10 12.5m

SCALE 1:250 AT ORIGINAL SIZE

NORTH

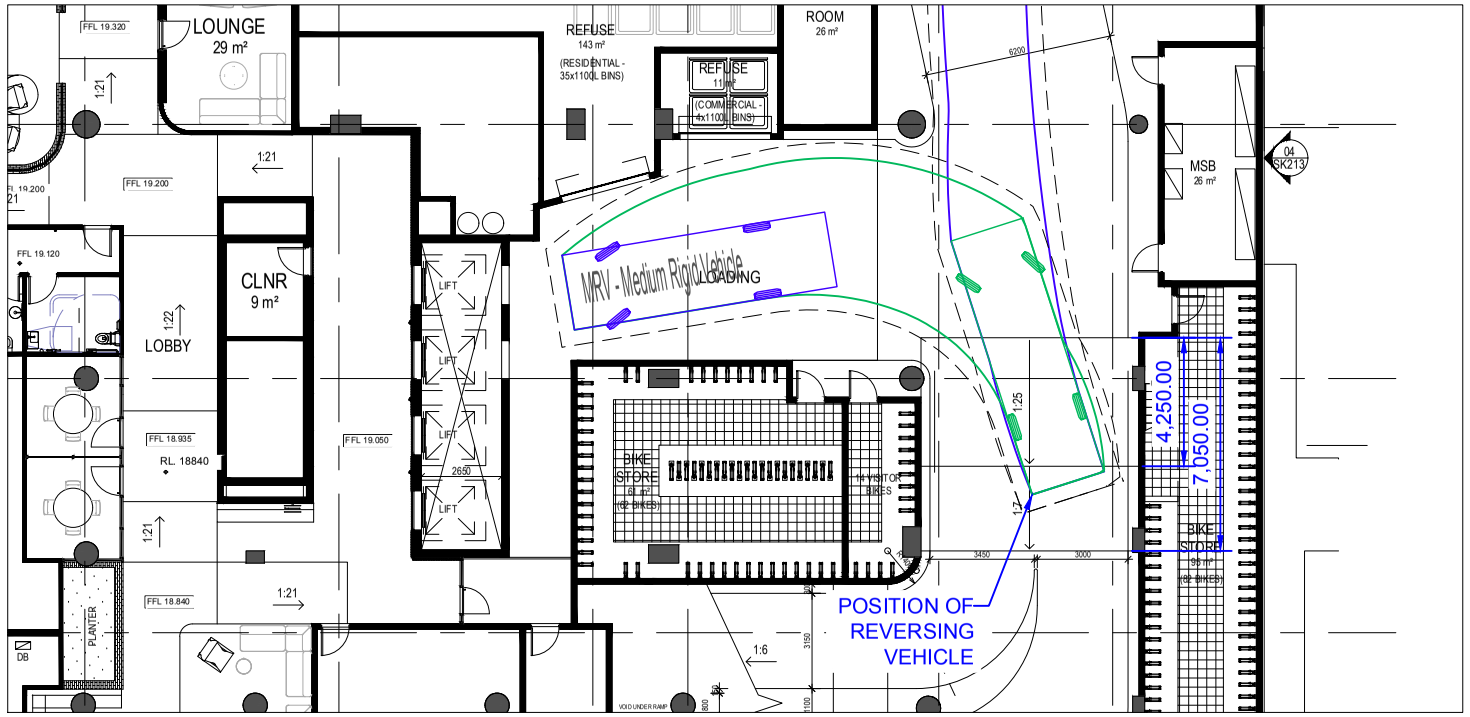
CLIENT: City Developments Limited

TTM CONSULTING PTY LTD
ABN 65 010 868 621
LEVEL 8, 369 Ann Street, BRISBANE QLD 4000
P.O. BOX 12015, BRISBANE QLD 4003
T: (07) 3327 9500 F: (07) 3327 9501
E: ttmbris@ttmgroup.com.au W: www.ttmgroup.com.au

PROJECT: **19 Campbell Street, Bowen Hills**

DRAWING TITLE: **SWEPT PATH ANALYSIS**
8.8m MRV - DESIGN VEHICLE

PROJECT NUMBER	23BRT0683
ORIGINAL SIZE	A3
DRAWING NUMBER	23BRT0683-02
REVISION	C
DATE	19 Aug 2024
SHEET	1 OF 1



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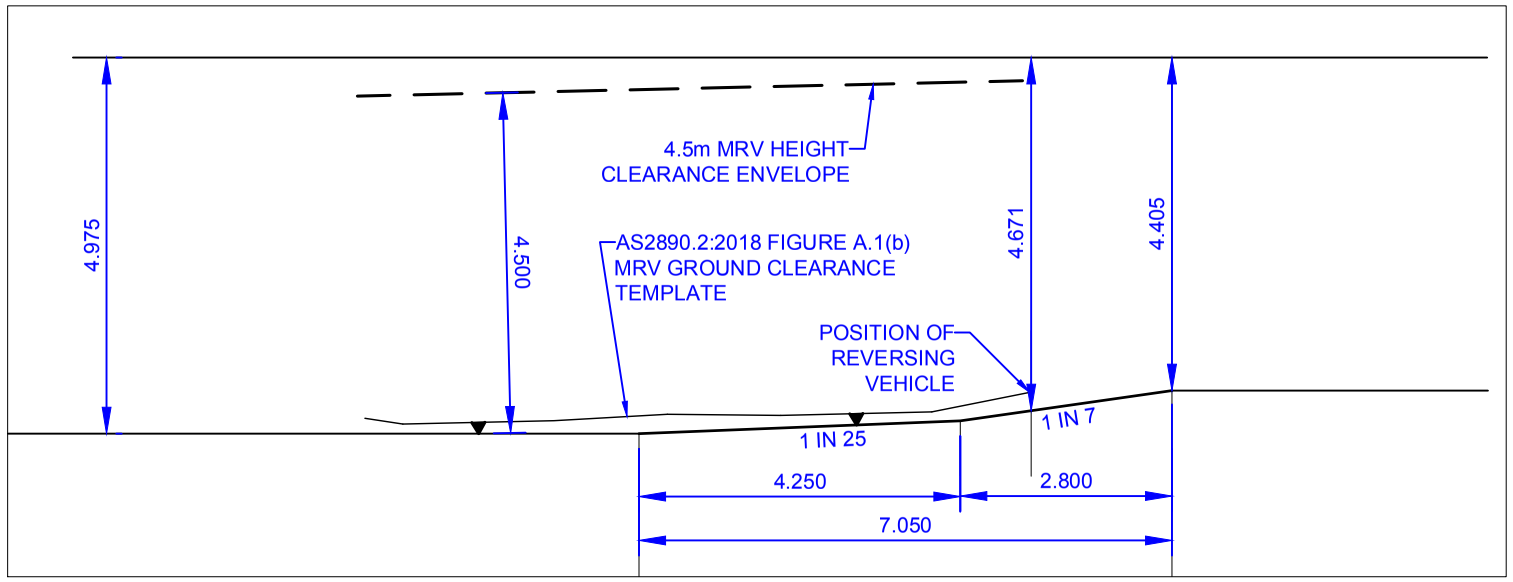

MRV GROUND AND HEIGHT CLEARANCE REVIEW

SCALE - 1 IN 100

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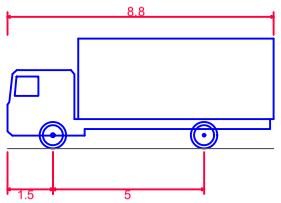
SCALE 1:100 AT ORIGINAL SIZE

FORWARD IN ENTRY MOVEMENT



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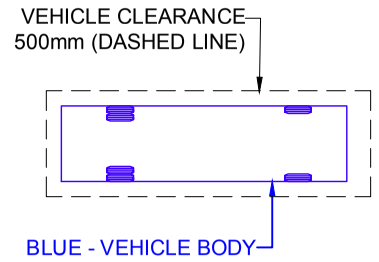

PRELIMINARY ADVICE ONLY

19 August 2024

REV.	DATE	AMENDMENT DESCRIPTION	DRAWN	CHECKED	APPROVED
B	19.08.24	REVISED ARCHITECTURAL BASE	DSF	RBe	SC
A	08.08.24	ORIGINAL ISSUE	DSF	RBe	SC

SCALE 0 2.5 5 7.5 10 12.5m

SCALE 1:250 AT ORIGINAL SIZE

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PROJECT: **19 Campbell Street, Bowen Hills**

DRAWING TITLE: **GROUND AND HEIGHT CLEARANCE REVIEW**
8.8m MRV - DESIGN VEHICLE

PROJECT NUMBER	ORIGINAL SIZE
23BRT0683	A3
DRAWING NUMBER	REVISION
23BRT0683-03	B
DATE	SHEET
19 Aug 2024	1 OF 1