

Date: 11 August 2025
Our Reference: J001451
Your Reference: DEV2024/1507

Attn: Peita McCulloch / Jennifer Davison

Economic Development Queensland
GPO Box 2202
Brisbane, Queensland 4001

Dear Peita / Jennifer,

Site Address:	332-334 Water Street and 30A Trinity Street, Fortitude Valley
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 [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>

We write on behalf of *Pellicano Living Pty Ltd* ("the Applicant") regarding the abovementioned development application.

On 16 September 2024, a further issues letter was delivered by *Economic Development Queensland*, as Assessment Manager. Please refer below for the Applicant's response to this further issues letter.

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

- Attachment 1 - Further Issues Letter
- Attachment 2 - Information Request Response
- Attachment 3 - Amended Proposal Plans
- Attachment 4 - Revised Landscape Report
- Attachment 5 - Wind Assessment
- Attachment 6 - Revised Waste Management Plan
- Attachment 7 - Civil Engineering Response
- Attachment 8 - Revised Noise Impact Assessment

■ Attachment 9 – Revised Traffic Impact Statement

In accordance with s83(b) a Notice of Compliance was received by the Applicant on 25 June 2025 noting the Minister for Economic Development Queensland ('MEDQ') was satisfied the Information Request was complied with.

Economic Development Queensland also agreed to the Section 92 Change to the development in writing on 25 June 2025. The Application was then formally notified on 07 July 2025, with invitation for comment available from 08 July to 05 August 2025.

On 07 August 2025, a Compliance Notice in accordance with s84D(2) of the *Economic Development Act 2012*, was received by *Economic Development Queensland* notifying the Applicant MEDQ decided the requirements under s84 of the *Economic Development Act 2012*, has been substantially complied with.

The current decision making period is therefore set to end on or about **01 October 2025**.

For completeness, this further issues response relies on the proposed change that was notified in accordance with s.92 of the *Economic Development Act 2012* as outlined in the Information Request Response, dated 12 June 2025, provided to *Economic Development Queensland* and included at **Attachment 2**.

Proposed Changes in Response to Information Request

As outlined in the Information Request Response at **Attachment 2**, following receipt of *Economic Development Queensland's* Information Request, dated 3 September 2024, the Applicant and consultant team reconsidered the proposal and made the following changes to address EDQ's feedback and enhance alignment with the Bowen Hills PDA Development Scheme. It is reiterated that the change application that has previously been accepted by *Economic Development Queensland* addresses the matters raised in *Economic Development Queensland's* Further Issues Letter and is summarised as follows:

- 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 six (6) storeys to the Brunswick Street tower and an addition of five (5) storeys to the Water Street 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)

These changes have been reflected in the revised detailed reporting included with this response, with a visual summary provided at Figure 1. Further, as outlined in the Information Request Response at Attachment 2, the response incorporates 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.

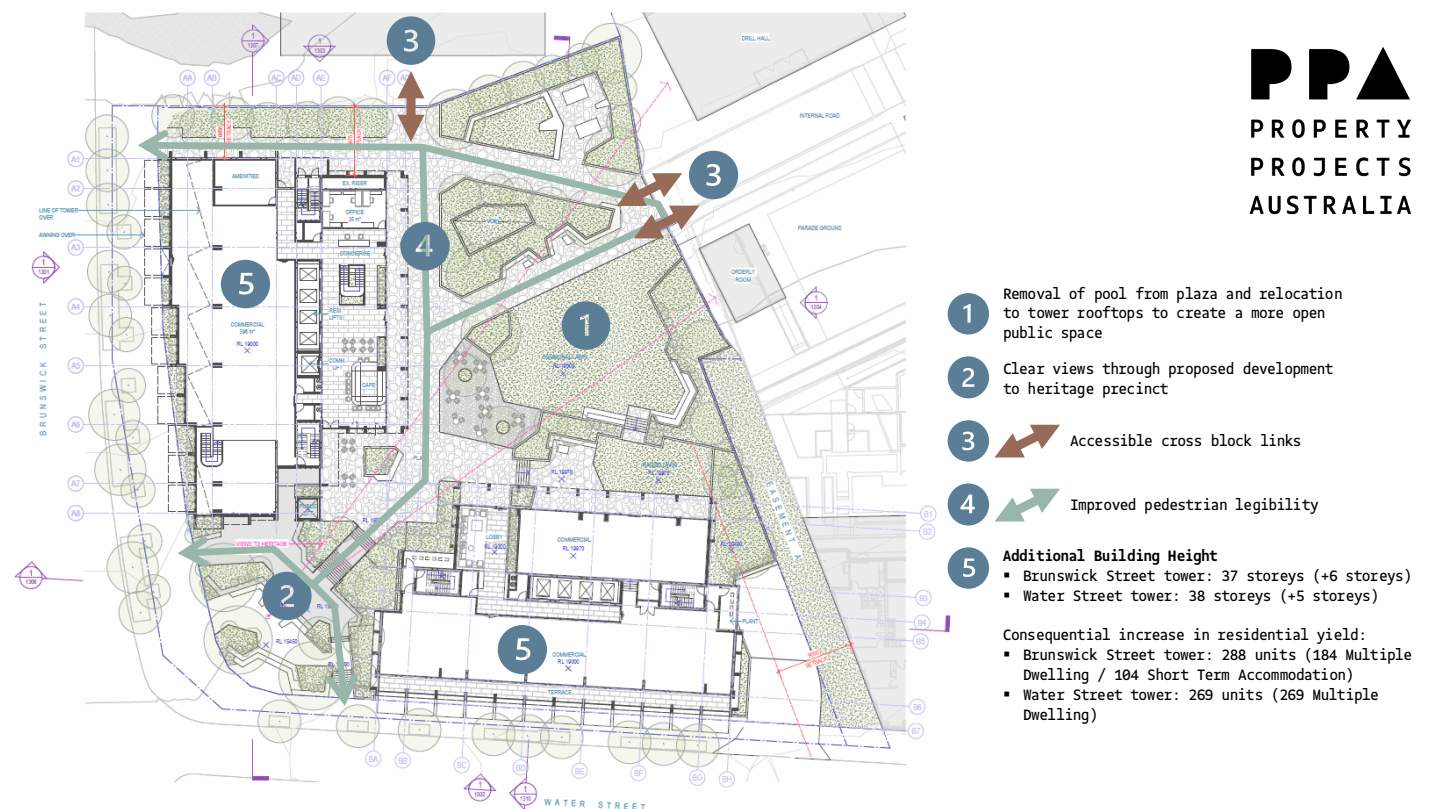


Figure 1 – Summary of Proposed Changes

On 25 June 2025, via formal correspondence, these changes were accepted by *Economic Development Queensland* as a minor change.

Engagement with Economic Development Queensland

Following receipt of *Economic Development Queensland's* Information Request / Further Issues Letter a series of collaborative meetings with *Economic Development Queensland* planning officers have occurred, with the most recent engagements as outlined below:

- On 4 February 2025, a meeting was held with *Economic Development Queensland* to discuss the information request as well as the proposed changes to the development, the information request items largely focused on Geotechnical engineering matters as well as Flood Assessment requirements. The main changes that were discussed at the meeting / that were made to the design and the overall development outcome are explained in detail above.
- On 7 August 2025, a meeting was held with *Economic Development Queensland* to discuss the final outstanding queries in relation to the Further Issues Letter. These primarily focused on waste management, traffic, and stormwater. At this meeting, the Applicant and consultant team provided a project update and outlined the next steps, including provision of the Further Issues Response (this letter).

FURTHER ISSUES RESPONSE

1. Civic Plaza and Cross Block Link Redesign

In accordance with the Bowen Hills PDA Development Scheme (Scheme), a redesign of the civic plaza and cross block links is required and must include:

- a. a more generous, publicly accessible and legible civic plaza which encourages social interaction, community and group activities, information, art and cultural activities and events; and
- b. two (2) x publicly accessible cross block links that provide generous, accessible and legible pedestrian connections from the streets to the civic plaza.

The current location of the private communal open space swimming pool significantly impacts the achievement of the public cross block link and civic plaza by dominating the space. It is requested that the redesign remove and/or significantly reduced and relocate the current pool so that it compliments rather than dominates the civic plaza.

Additionally, the redesign must consider and include the following:

- a. appropriate accessible connectivity, wayfinding, legibility and CPTED for all public spaces, including:
 - i. from the lower-level vehicular drop off to the public plaza and the lobby entry of both buildings
 - ii. from the significant corner to the civic plaza via the cross block link;
 - iii. from Brunswick Street to the civic plaza along the north boundary of the development via the cross block link.
- b. active frontages along the extent of both cross block links.
- c. a 3d vista, illustrating how sightlines from the corner of Brunswick and Waters Streets, through the development to the civic plaza and Heritage Precinct have been delivered.

Applicant's Response:

Please refer to the Amended Proposal Plans prepared by Woods Bagot and Revised Landscape Report prepared by Lat Studios provided in **Attachment 3** and **Attachment 4** respectively. In direct response to *Economic Development Queensland's* request, the Civic Plaza Space has been thoughtfully redesigned, to provide for the following:

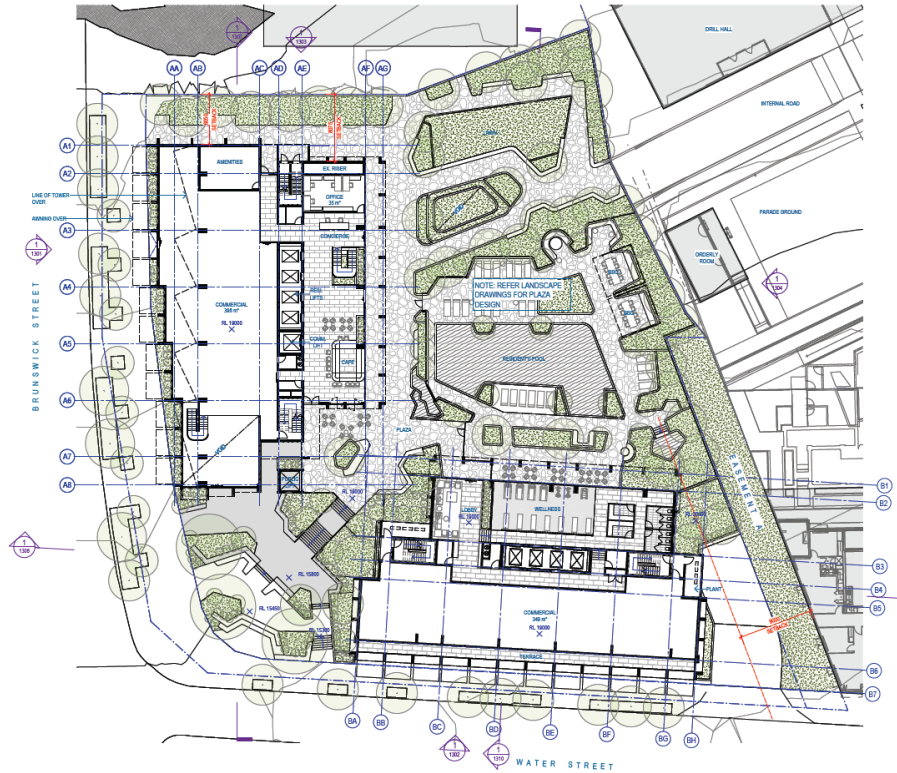
- The revised design includes the relocation of the communal swimming pool from the plaza to the rooftops of each residential tower, enhancing the role and function of the civic plaza and the precinct's role as a civic landmark aligning with strategic planning objectives of the PDA Development Scheme promoting accessibility, urban connectivity, and social inclusion.
- The plaza layout has been carefully reworked to improve spatial clarity, function, and comfort. The revised design supports informal social interaction and programmed cultural activity, underpinned by new landscaping, seating opportunities, and material treatments that accommodate diverse passive and active uses.
- Enhanced permeability and movement across the site, two clearly defined public cross-block links are now included:
 - A north-south connection from Brunswick Street along the northern boundary; and
 - An east-west connection from the prominent corner through to the civic plaza and Heritage Precinct.

These links are reinforced through integrated wayfinding and landscape/architectural treatments. Safety and visibility have been prioritised through adherence to CPTED principles. A supporting 3D vista and diagram suite has been prepared to illustrate pedestrian sightlines and connections extending from Brunswick and Water Streets toward the central plaza space.

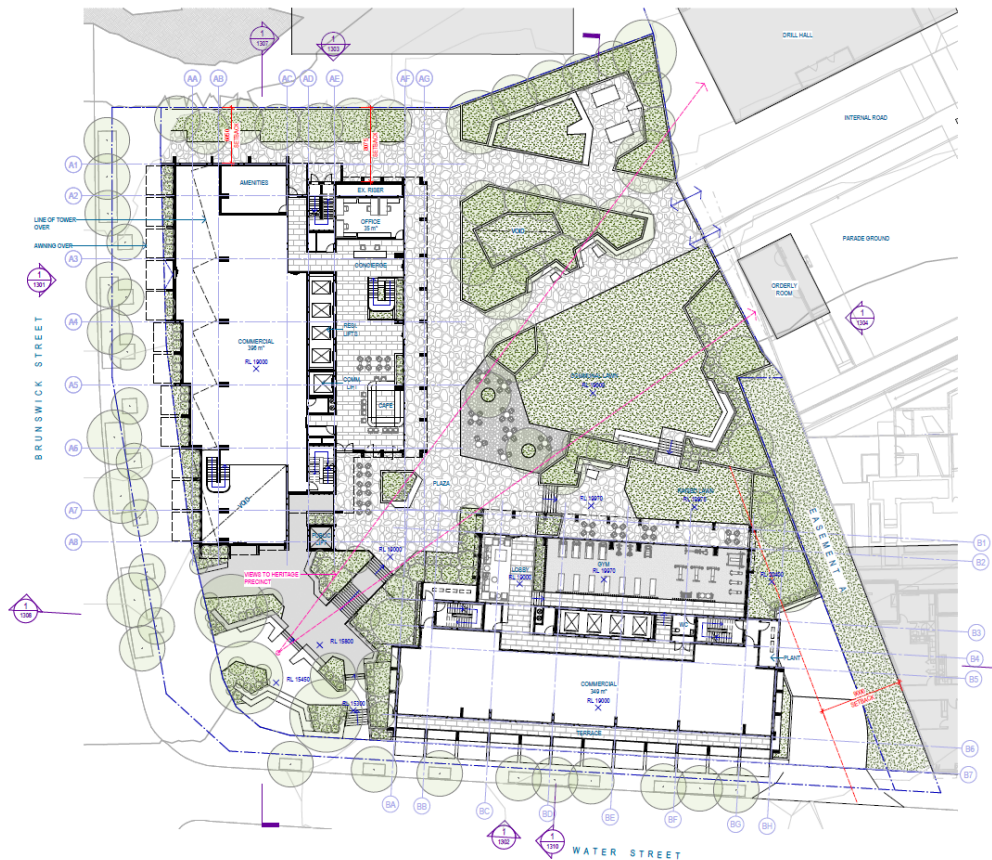
These amendments underscore a strong commitment to delivering an inclusive and high-quality public realm.

These design modifications aim to reinforce public amenity, urban legibility, and activation outcomes for the precinct. Ultimately, as part of the revised plaza design, the space has been reconfigured to allow for a direct connection to the private accessway at 10 Trinity Street, Fortitude Valley, thereby strengthening site integration and access. This modification contributes to enhance pedestrian permeability wayfinding across the precinct. Importantly, the design continues to offer spaces for passive recreation and activation, supported by the presence of café operations and complementary uses that reinforce civic engagement within the public realm.

A visual summary of the design changes illustrating the previous layout vs the revised is provided at Figure 1. These images also show the relocation of the communal open space areas from the ground floor to the rooftop of each tower.



Extract 1 - Previously Proposed Plaza Design
Source - Woods Bagot



Extract 2 - Revised Plaza Design
Source - Woods Bagot



Extract 3 - Revised Water Street Tower Rooftop
Source - Lat Studios



Extract 4 - Revised Brunswick Street Tower Rooftop
Source - Lat Studios

2. Setback and Tower Separation

The proposed development does not meet the required street and side setbacks, and the required tower separation distances as per the Scheme. Provide amended plans and/or detailed justification as to how the PDA-wide criteria such as delivering access to light, minimizing over shadowing and maximizing amenity and privacy for both occupants and neighbors is achieved with the proposed reduced building setbacks/separation distances. Prepare and submit wind and solar studies that justify any proposed variation, along with an amenity report where appropriate.

Applicant's Response:

It is acknowledged that the Mixed Use Zone of the PDA Development Scheme seeks a minimum 12m separation distance between balconies or windows in habitable rooms up to level 4, 18m separation between buildings is also sought for the built form above level 4.

It is important to acknowledge that a fully compliant outcome that simultaneously satisfies all prescribed setbacks, tower separation distances, and plaza delivery requirements is not achievable on this site due to its physical constraints and location of the site. The site's geometry, dimensions, and urban context inherently limit the ability to deliver these elements in full without compromising the development's viability or its contribution to the broader precinct.

In particular, the prescribed tower separation is the key performance outcome that drives the proposed design response. Achieving this separation enables the delivery of two distinct towers, which is critical to avoiding a single-tower solution that would represent a significant underutilisation of a prominent corner location of a strategically located site.

The proposal provides an exemplar development and design outcome, demonstrating that the proposed built form maintains and enhances design excellence consistent with the strategic intent of the PDA Development Scheme:

■ Urban Design & Public Realm Outcomes

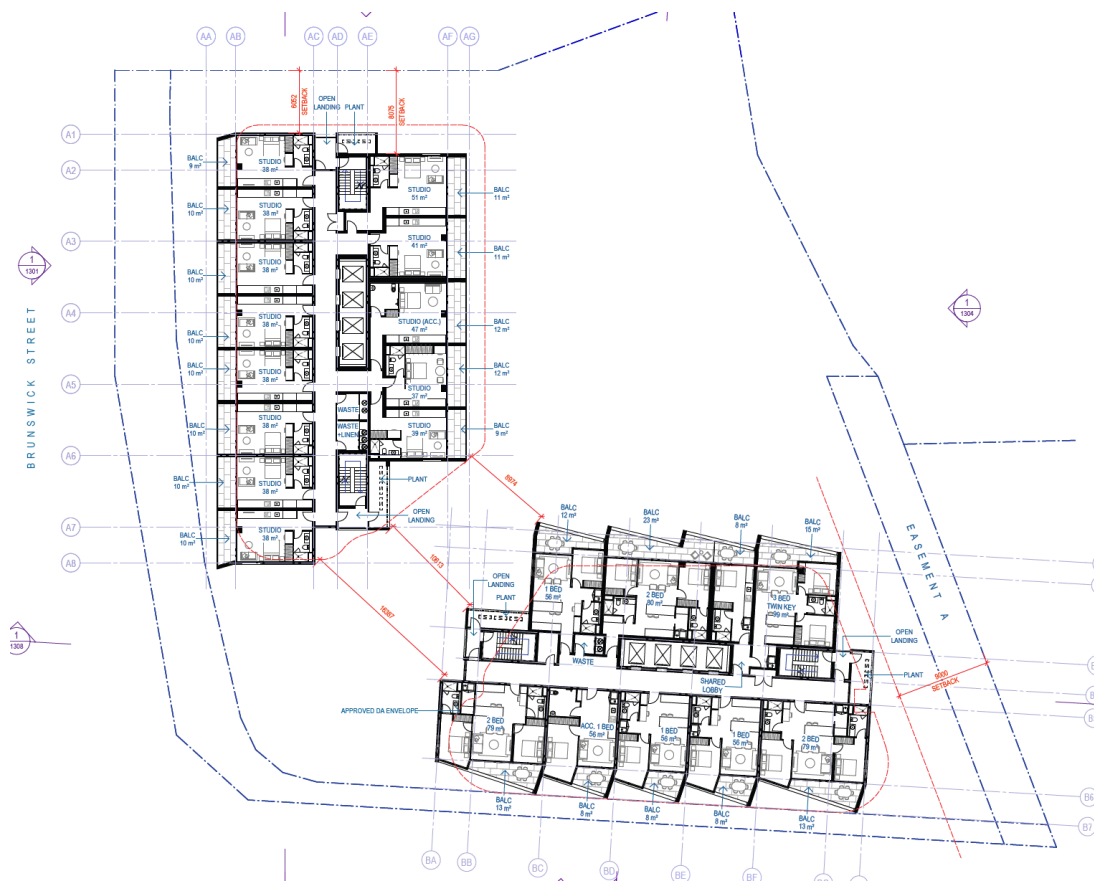
- The setbacks proposed do not compromise the ability for the proposal to incorporate landscaping to the relevant boundaries whilst providing ample widths and connectivity through to the public realm. It is important to note that the site represents a significant corner, and the development has been intentionally designed to celebrate the corner setting of the site and its presence. Furthermore, the delivery of the public realm has been prioritised to enhance permeability, landscaped gathering zones, and retail edges that support pedestrian movement and social interaction.

■ Architectural Articulation & Identity

- The development is broken into distinct forms, consisting of a clear podium and tower typology.
- The dual towers feature high levels of architectural articulation, with podium levels responding sensitively to the street edge through layering, a considered material palette, and emphasis on the human scale (particularly in the context of the expansive ground floor plaza).
- The siting and orientation of the buildings benefit from improved access to natural elements, including daylight natural breezes and deep recesses for occupant comfort.
- Appropriate separation distances have been allowed for between the proposed towers and the adjoining landholdings ensuring that the proposal is not compromising the amenity of the adjoining land.

■ Internal Tower Separation

- The scheme has been carefully designed to provide appropriate tower separation, maintaining privacy, outlook, and cross-ventilation for residents.
- The tower separation also affectively celebrates the corner setting of the site by providing an entry statement to the landmark corner setting and providing two towers that sit above the expansive ground floor plan addressing the two distinct street frontages in uniform fashion.
- Substantial tower separation has been incorporated into the design providing 8.9m to 16m of distance between the towers. The orientation and siting of the towers area intentional so as to not compromise the amenity of the occupants / residents in either tower.
- The layout of the floor plans has also been intentionally considered to avoid any direct overlooking into the neighbouring tower, with no direct view or angle into habitable areas. As can be seen below, the habitable rooms and private open space areas have been orientated away from the adjacent tower either overlooking the public plaza or the road network, with no direct overlooking of the adjacent tower.



Extract 5 – Typical Floor Plan (Level 6 – 12)

Source – Woods Bagot

The approach to the proposed setbacks is underpinned by a robust and intentional design response to the setting and orientation of the site. Ultimately, the proposal enhances the site's contribution to the urban fabric of Bowen Hills. The development achieves high-quality public realm outcomes, distinctive architecture, and generous landscape integration—fully aligned with the PDA's benchmarks for design excellence.

Additional solar studies and shadowing effects have been prepared by Woods Bagot and included in **Attachment 3**, as extracted below.



Extract 6 – Shadow Analysis Winter Solstice
Source – Woods Bagot



Extract 7 – Shadow Analysis Summer Solstice
Source – Woods Bagot



Extract 8 – Shadow Analysis Equinox
Source – Woods Bagot

Furthermore, a Wind Assessment has been prepared by CPP Wind Engineering Consultants and included in **Attachment 5**, which provides a full response to the wind component of this item. The Wind Assessment is summarised as follows:

- The wind environment at the site due to the surrounding built form is unlikely to be problematic due to wind in such surrounds generally experience less channelling than the more built up environments;
- Potential wind implications include downwash, and channelling flows may be experience in localised areas of the site;
- Several wind mitigation measures such as the podium form, façade profile and balconies assist in breaking up the wind profile and interrupt the direct flow of wind.
- Trellis structures and landscaping treatments can also assist in mitigating any wind implications on the site as a result of the proposal.

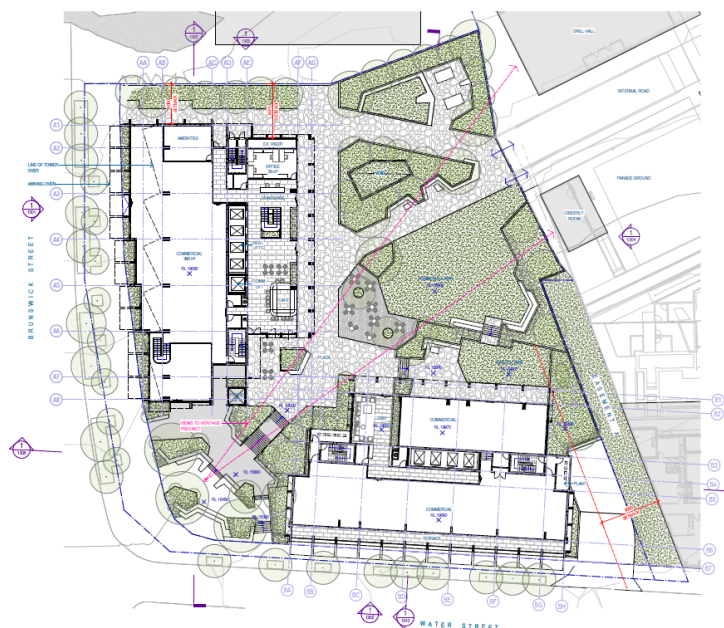
The Applicant notes that, should a full Wind Impact Assessment be deemed necessary, they are prepared to accept a condition of the PDA development approval requiring its preparation and lodgement for review / approval by *Economic Development Queensland*.

3. Heritage

Provide details and amended plans where required that illustrates how all three State listed heritage buildings (the Heritage Precinct) have been responded to in the current design and form part of the civic plaza.

Applicant's Response:

Please refer to the Amended Proposal Plans, in particular the revised Plaza design (Drawing A-1207-Rev Y), at **Attachment 3**. The revised plan, extracted below, illustrates the celebration of the heritage setting of the adjacent Drill Shed, Caretaker's Cottage and Orderly Room (former) on Water Street (Heritage ID - 602797) through view lines from the corner of Brunswick and Water Streets, through the expansive ground floor plaza. This allows clear visibility through the communal lawn, landscaping and walkways allow clear visibility and direct access to the heritage precinct as envisaged by *Economic Development Queensland*.



Extract 9 – Revised Plaza Design – Recognising Heritage Buildings

Source – Woods Bagot

The landscaping strategy has reflected this through the removal of structures and elevated planters within the view corridor and provision of a delineated pathway. Landscaping has been provided to frame the heritage precinct with feature large canopy trees bordering the heritage buildings to draw attention to the heritage buildings set between the trees.



Extract 10 - Revised Plaza Landscaping Strategy - Streetscape & Plaza
Source - Lat Studios



Extract 11 - Revised Plaza Landscaping Strategy - Plaza
Source - Lat Studios

It is reinforced to *Economic Development Queensland* the proposed development is contained wholly within site boundaries and appropriate construction practices will be adopted to ensure no impact on the adjoining heritage place. This may be reasonably conditioned by *Economic Development Queensland* as part of the PDA development approval.

4. Communal Open Space

In accordance with the Scheme, the development is to provide universally accessible communal open space equivalent to a minimum of:

- a. 80% of the site area, or
- b. 15% of the multiple residential GFA

From the information provided, the proposal does not meet the Scheme requirements. Provide amended plans illustrating compliance with the Scheme.

Applicant’s Response:

The provision of the expansive ground floor plane and public plaza limit the ability to deliver large amounts of communal open space, particularly at the ground floor level. The revised design has provided for the communal open spaces to be introduced to the rooftops of the two towers.

Due to the elegant and intentionally slender design of the towers, the proposal does not allow for expansive communal areas on these rooftops but still provides for adequate amount of space. It is further noted that each unit is provided with adequate and useable private open space in the form of balconies, whilst future residents will also have the benefit of the publicly accessible plaza space.

The development scheme requires that multiple residential development provides for communal open space equating to a minimum of:

- 80% of the site area; or
- 15% of the multiple residential Gross Floor Area.

Based on these figures, the post dedication site area of 4,959m² requires communal open space in the order of 3,967.2m² (being 80% of the site area) or based on a total residential Gross Floor Area component of 44,022m², 6,603.3m² of Communal open space would be required (being 15% of the multiple residential Gross Floor Area).

As demonstrated in Table 1 below, the proposal provides for a total of 1,630m².

The communal open space calculations for the development are summarised in Table 1.

Table 1 – Communal Open Space Areas

Location	Area
Upper Ground	
Internal (Cinema, Meeting Rooms, Work Pods)	185m ²
Rooftop	

Internal (Private Dining)	236m ²
External (Wellness Facilities, Amenities, Pool)	1,209m ²
Total:	1,630m ²

Further to the provision of the above, the proposed development will deliver the expansive external plaza area which equals 2,577m².

Through this additional area that will be publicly accessible, the proposal delivers a significant amount of Communal and public open space.

The proposed development provides universally accessible communal open space of an area that equates to 87.3% of the site area (4,207m²), which complies with the Bowen Hills PDA Development Scheme.

5. Private Open Space

In accordance with the Scheme, where private open space is provided on a balcony the minimum area is to be 9m² (for 1 bedroom units) and 12m² (for 2+ bedroom units), with a minimum dimension of 3m. Provide amended plans demonstrating that the minimum requirements are met.

Applicant's Response:

Generally, the proposed development provides for the minimum private open space areas, however some of the one-bedroom units provide an alternative outcome to the prescribed 9m² minimum by providing balconies of 7-8m². These units are identified in Table 2.

Table 2 – Private Open Space Proposed

Location	Unit(s)	Proposed Private Open Space Area
Water Street Tower - Level 4	1 X One-bedroom Unit (Dual Key)	8m ²
Water Street Tower - Level 5	1 X One-bedroom Unit (Dual Key)	8m ²
Water Street Tower - Level 6 to 12 (seven (7) levels)	1 X One-bedroom Unit (Dual Key)	8m ²
	3 X One-bedroom Unit	8m ²
Water Street Tower - Level 13 to 35 (23 levels)	1 X One-bedroom Unit (Dual Key)	8m ²
	3 X One-bedroom Unit	8m ²
Brunswick Street Tower - Level 13 to 35 (23 levels)	1 X One-bedroom Unit (Dual Key)	8m ²
	1 X One-bedroom Unit	7m ²
	2 X One-bedroom Unit	8m ²
Total:	213 units	-

It is considered that where balconies comprising 7m² or 8m² is provided, it is balanced by the delivery of ample communal areas, specifically the Plaza at ground level and the rooftop communal facilities. It is worth noting, the smaller balconies are limited to one (1) bedroom units, generally as a result of being located within the middle of the building elevation as opposed to a corner unit. Further, in many instances and as noted in Table 2, the one (1) bedroom unit is part of a dual key arrangement with an associated two (2) bedroom unit, which together would have a combined private open space of 22m² or 23m² (exceeding the

prescribed minimum of 9m² and 12m²). It is noted that in most instances each unit is provided with greater than the required minimum private open space area.

The proposed reduction in private open space is strategically offset by a comprehensive and high-quality communal open space offering, aligned with the principles of the Build-to-Rent (BTR) model. This model prioritises shared amenity, community engagement, and long-term tenancy over traditional strata-based ownership, thereby shifting the emphasis from individual private spaces to well-designed communal environments.

At the ground plane, the development delivers an expansive, publicly accessible plaza that serves as a vibrant interface between the building and the broader urban context. This plaza is not only a visual and social focal point but also a key contributor to the public realm, enhancing pedestrian connectivity and fostering community interaction.

The Applicant is therefore of the view that in instances where private open space of 7-8m² is provided, it is appropriate given:

- The balconies are appropriately sized and located to provide an extension to the main living areas of the apartments, enhancing the amenity and liveability for residents, particularly regarding access to the natural elements;
- The balconies are of a functional size and do not have any utilities stored on them in the form of hot-water systems or air-conditioning units; and
- The proposed balconies contribute to the form and detail of the building by contributing to variation and articulation in the built form and scale, particularly when viewed from Brunswick and Water Streets.

Therefore, any slightly smaller balcony sizes are offset through the provision of significant communal spaces and resident facilities as well as the significant civic plaza that will be delivered at the ground floor.

It is noted that there is a relevant example of a nearby development approval (DEV2024/1479) that approved private open spaces below the prescribed minimum under the Bowen Hills PDA Development Scheme, with 6.81m² approved for a one (1) bedroom unit.

6. Housing Diversity

In accordance with the Scheme, the development is to provide:

- a. diverse housing choice to suit a variety of households by offering universal design and variety in dwelling size, configuration and adaptability;
- b. a minimum of 10 per cent of total residential GFA as dwellings with 3 or more bedrooms;
- c. a minimum of 5 per cent of total residential GFA as either or a mix of public housing, social housing or affordable housing, and
- d. dwellings that are for public housing, social housing and affordable housing are integrated and distributed throughout residential and mixed-use developments and present high-quality design outcomes to avoid identifying them or setting them apart in the community.

Provide amended plans that demonstrate how the developments meets the Scheme requirements for Housing Diversity. It is noted that the proposed 3 bedroom units are all 'duel keys', which are unable to be used in the calculation of 3 bedroom product as required under the Scheme.

Applicant's Response:

It is noted to *Economic Development Queensland* that correspondence was issued on 14 July 2025 explaining the intention of the diversity of the product proposed and Pellicano's longer term drivers for their ongoing contribution as market leaders to the residential and short term accommodation sectors. For completeness, the correspondence is summarised as follows:

Development Scheme – Housing Diversity Requirements

Section 2.5.3 of the Bowen Hills PDA Development Scheme outlined the requirements for housing diversity outcomes for Multiple Dwelling (MUD) developments. Specifically, it requires:

- i. Diverse housing choice is provided to suit a variety of households by offering universal design and variation in dwelling size, configuration, and adaptability;
- ii. A minimum of 10% of total residential gross floor area (GFA) must comprise dwellings with 3 or more bedrooms;
- iii. A minimum of 5% of total residential GFA must comprise either, or a mix of, public housing, social housing, or affordable housing; and
- iv. These housing types must be integrated and distributed throughout the development and designed to avoid visual separation or differentiation in the community.

These requirements apply to the MUD component only and do not extend to Short-Term Accommodation.

In accordance with the revised design scheme lodged as part of the Information Request Response, the development proposes 453 MUD units and achieves the following unit mix:

- One-bedroom dwellings: 227 units (35% of total GFA)
- Two-bedroom dwellings: 170 units (38% of total GFA)
- Dual-key dwellings / 3-bedroom flexible units: 56 units (16% of total GFA)

The proposal therefore exceeds the 10% benchmark for three-bedroom GFA, with the 56 dual-key units constituting 16% of total GFA. These units have been carefully designed as flexible 3-bedroom dwellings with dual occupancy potential, providing configuration and adaptability that support a range of household types at varying life stages.

Suitability of Dual-Key Product – Flexibility, Adaptability and Long-Term Liveability

For clarity, the dual-key apartments are effectively two separate units (one-bedroom and two-bedroom) that share a common entrance allowing them to operate as either a unified home or two distinct residences. They are typically designed to be more space-efficient than two separate apartments, ensuring that both units have sufficient privacy and independence and are ideally suited to residents who want to live with family or friends but still have an independent living space.

The benefit of such an arrangement is that it provides adaptability for residents and flexibility to the applicant to rent out both units as a single dwelling or rent out each unit individually in accordance with market demands at the time. This arrangement supports a wide range of contemporary living needs including multi-generational families, co-living arrangements, adult children or elderly parents living semi-independently. It also future-proofs the housing stock by allowing households to adjust their use of the space over time without needing to relocate – in this sense, the proposal represents a truly adaptable housing product that can evolve with the market over the life of the project (50 years plus).

As a leading build-to-rent asset owner and service operator, Pellicano Living relies on flexibility in design to meet varying market demands, especially considering the long-term nature of the ownership / operational structure. That is, there is a key driver for the design of Pellicano Living's build-to-rent assets to enable the product to meet short, medium and long-term demand factors. The proposed dual-key arrangement provides the ultimate design flexibility in this context and, therefore, is a critical factor that will underpin the long-term sustainability of the proposed residential components of the development. From a planning perspective, it also offers a more space-efficient and context-sensitive alternative to delivering bulkier, conventional three-bedroom units in a dense urban environment.

In this regard, the proposed dual-key format delivers a housing solution that is both innovative and practical – achieving the Bowen Hills PDA Development Scheme's objectives for adaptability, inclusivity, and long-term liveability in a form that reflects modern household structures and real-world demand.

State Facilitated Development – South City Square Precedent

As a relevant and recent precedent, Pellicano Living secured approval via the State Facilitated Development (SFD) pathway (Ref: SFD-01052 – Approval dated 19 February 2025) for a 35-storey Multiple Dwelling comprising 435 residential units at South City Square in Woolloongabba. The assessment of that application required compliance with similar principles to those outlined in the Bowen Hills PDA Development Scheme, including:

- A demonstrated mix of dwelling types; and
- Diversity in the number of bedrooms provided across the development.

To respond to this requirement, the proposal incorporated a range of dwelling formats, including studios, one-bedroom units, and dual-key studio/one-bedroom configurations. These dual-key units were specifically designed to function as flexible two-bedroom dwellings, offering a compact yet highly adaptable product that could meet the evolving needs of modern households.

As part of the application process, comprehensive detail was provided to the Department regarding the configuration, operation, and design rationale for the dual-key product. The Department acknowledged and supported the typology, confirming that the dual-key units delivered genuine diversity and flexibility in housing supply. The product was recognised as a forward-thinking housing solution that promotes long-term adaptability – allowing occupants to modify how the space is used over time without needing to relocate. Notably, the Department also supported the dual-key product as a mechanism for addressing housing affordability. The configuration enables low to moderate income earners to access housing in inner-city locations while still having access to sufficient space and privacy for family-oriented living. In doing so, the dual-key model delivers both flexibility and affordability without compromising internal amenity or design quality.

The Department's position on the South City Square application reinforces the view that well-designed dual-key dwellings are a legitimate and valuable component of a diverse and resilient housing strategy, particularly for build-to-rent developments.

Summary

The proposed development delivers a clear and measurable response to the housing diversity requirements of the Bowen Hills PDA Development Scheme. The inclusion of 56 dual-key dwellings (16% of total GFA) satisfies and exceeds the Bowen Hills PDA Development Scheme's three-bedroom benchmark. More importantly, these

dwellings have been carefully designed to function as high-quality, flexible, and adaptable homes that respond to contemporary living needs and shifting household structures.

The product is not only aligned with the intent of the Bowen Hills PDA Development Scheme but also draws strong support from the recent approval for Pellicano Living at South City Square. The South City Square application confirms that dual-key configurations are an accepted and endorsed form of achieving housing diversity and affordability when appropriately designed and justified as is the case here.

It is noted that the Applicant is willing to accept a condition of the PDA development approval to ensure the units cannot be strata titled.

7. Landscaping

As per the scheme and PDA Guideline no.8, the development is to provide landscaping which is:

- a. 20 per cent of site area, including 5 per cent of site area as deep planting, within a 5.0 metres minimum dimension; and
- b. along a minimum length of 50% of street frontages. Provide detailed plans that clearly identify the amount of landscaping and deep planting proposed.

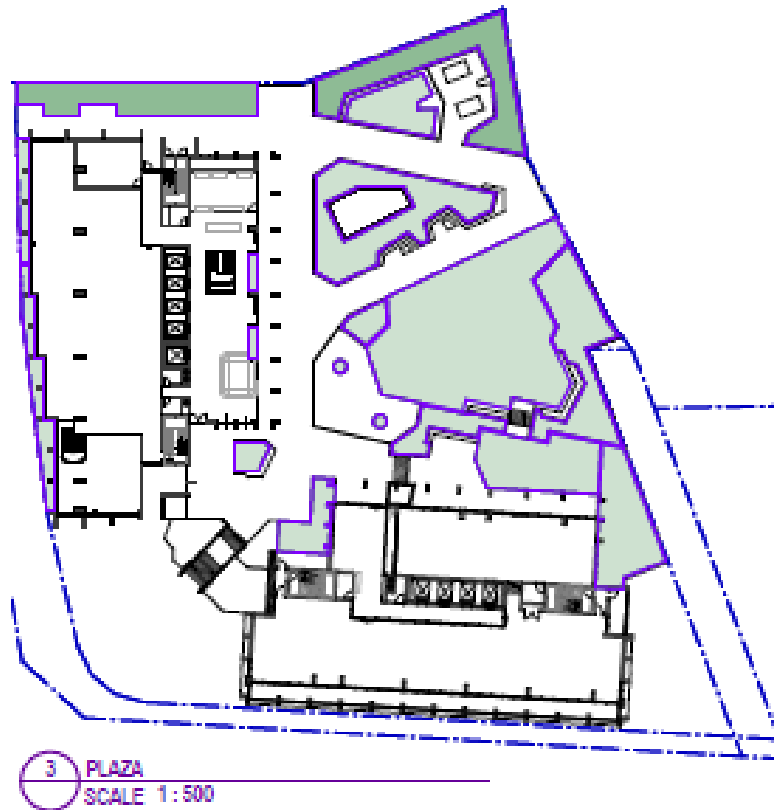
Provide detailed plans that clearly identify the amount of landscaping and deep planting proposed.

Applicant's Response:

The proposed Plaza will have substantial landscaped area, including an area of 197m² for deep planting (with an additional 224m² at lower ground), large canopy trees and dense layered planting, that sits at the centre of the development to benefit all future residents and users. The proposal comfortably complies with the minimum deep planting area of 5% with 421m² or 8% of the site area as deep planting provided (based on the pre-land dedication site area). Further to this, the proposed development provides a total planted area of 1,970m², which again comfortably achieves the prescribed minimum of 20% at 27.3%.

It is not possible to provide a minimum length of 50% landscaping along the street frontages as deep planting cannot be achieved due to the levels of the site, however, this has been balanced through the provision of substantial containerised planting to enable a green edge along the street frontages. Through streetscape upgrades, the streetscape of Water Street and Brunswick Street will be enhanced to provide planted areas and street trees that will contribute to the overall greening of the street frontages.

Please refer to the Amended Proposal Plans prepared by Woods Bagot and Revised Landscape Report prepared by Lat Studios provided in **Attachment 3** and **Attachment 4** respectively.



Extract 12 - Deep Planting Area - Plaza

Source - Woods Bagot



Extract 13 - Revised Plaza Landscaping Strategy - Plaza

Source - Lat Studios

8. Sustainability

The Scheme, requires buildings to achieve either:

- a. a minimum of 6 leaf EnviroDevelopment certifications
- b. a minimum of 4 star Green Star: Design and as Built certification, or
- c. an equivalent rating under an alternative rating system.

Demonstrate how this requirement is being satisfied through this development.

Applicant's Response:

The Applicant acknowledges that the proposed buildings are required to achieve either (a), (b) or (c) of the outcomes outlined under Item 8 and we confirm that the Applicant is accepting of a condition of the PDA development approval that requires achievement of these outcomes. Following issuance of the Further Issues Letter, *Economic Development Queensland* has agreed to include the required outcomes for Item 11 as a condition of the PDA development approval.

9. Geotechnical Site Investigation Report

Submit 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" in the initial submission stage covering the following items as a minimum.

- a. A Geotechnical Investigation Plan representative for the whole development area
- b. Site description and Site Geology Map (Can be extracted from QGD 2023 Geology Map)
- c. Representative number of Boreholes along with SPT tests/CPT tests at the borehole locations
- d. Details of the stratigraphy, groundwater level, excitability of the material
- e. Representative Soil Sampling from BH and Laboratory testing covering MC, PSD, AL, LS, Lab Compaction, Soaked CBR, Emerson Class, EC/pH, Shrink/Swell in accordance with AS1289
- f. Geotechnical assessment for the Earthwork, Batter slopes, Building Footings, Soil dispersion according to relevant Australian Standard

Applicant's Response:

The Applicant accepts that a geotechnical site investigation report will be required to facilitate detailed design of the development, however based on their experience, it is submitted that this level of reporting is typically required during subsequent approval process (e.g. compliance assessment / operational works / building approval). On this basis, the Applicant proposes that a Geotechnical Site Investigation Report be prepared and submitted to *Economic Development Queensland* for endorsement as part of a compliance assessment process and the Applicant is accepting of a condition that provides guidance around this process.

10. Shoring / Retention Concept Design

Maximum height of the Soil/Rock encounters in the basement excavation and the type of retaining structure to hold the Soil/Rock in the excavation works needs to be provided in the geotechnical assessment part. The selection of Retaining/shoring structure should be as per AS4678: Retaining Structure.

Note: If Shoring/Retaining Concept Design proposes Anchoring system, a consent from affected landowners or road managers needs to be provided.

Applicant's Response:

We acknowledge that excavation detail will be required to be provided as part of a future Geotechnical Assessment to support delivery of the project, however this detailed information can be provided following Detailed Design and confirmation of the construction methodology, which is a standard approach. We confirm that the Applicant is accepting of a condition of the PDA development approval requiring the preparation and endorsement of a Geotechnical Assessment. Following issuance of the Further Issues Letter, *Economic Development Queensland* has agreed to include the required outcomes for Item 10 as a condition of the PDA development approval.

11.Excavation and Basement Concept Design

Submit a basement concept design that ensures the basement is designed and ultimately constructed to accommodate reasonable assumptions of the loading of the future development of the land above adjacent to it. This includes, but is not limited to, the potential loading from shelters, pavements, furniture, mature trees / vegetation, high - quality soil, rainwater tanks, maintenance vehicles, construction vehicles and temporary loading during construction.

Applicant's Response:

We acknowledge that excavation detail and basement design will be dependent on a future Geotechnical Assessment, however this detailed information can be provided following Detailed Design and confirmation of the construction methodology, which is a standard approach. We confirm that the Applicant is accepting of a condition of the PDA development approval which requires the preparation of detailed excavation and basement plans and lodgement for endorsement by *Economic Development Queensland* prior to commencement of site works. Following issuance of the Further Issues Letter, *Economic Development Queensland* has agreed to include the required outcomes for Item 11 as a condition of the PDA development approval.

12.Groundwater Management Strategy

Submit a GMS during all work phases in accordance with Australian Groundwater Modelling Guidelines, 2012 consideration of the basement and shoring concept design. A concept stage of the extent of drawdown including plots of groundwater contours and proposed mitigation measures to reduce the impact of drawdown on existing infrastructure (i.e. buildings and services) needs to be included.

Applicant's Response:

We acknowledge that a Groundwater Management Strategy will be required to support delivery of the project, however this detailed information can be provided following Detailed Design and confirmation of the construction methodology, which is a standard approach. We confirm that the Applicant is accepting of a condition of the PDA development approval which requires the preparation of a Groundwater Management Strategy and lodgement for endorsement by *Economic Development Queensland* prior to commencement of site works. Following issuance of the Further Issues Letter, *Economic Development Queensland* has agreed to include the required outcomes for Item 12 as a condition of the PDA development approval.

13. Structural Monitoring and Vibration

Submit a concept plan to forecast expected settlement and vibration during all phases of work including:

- a. excavation of basement and shoring;
- b. installation of new foundation (i.e. Piling), if any;
- c. proposed methods to mitigate and control vibration and ground movement during construction; and
- d. settlement and vibration limit as well as monitoring methods for adjacent infrastructures (building, roads, utility etc), if any.

Applicant's Response:

We acknowledge that a detail of the expected settlement and vibration during construction will be required, however this detailed information can be provided following Detailed Design and confirmation of the construction methodology, which is a standard approach. We confirm that the Applicant is accepting of a condition of the PDA development approval requiring this detail to be provided and endorsed prior to commencement of site works. Following issuance of the Further Issues Letter, *Economic Development Queensland* has agreed to include the required outcomes for Item 13 as a condition of the PDA development approval.

14. Water and Sewer – Service Advice Notice

Submit a SAN (Service Advice Network) to identify any required infrastructure upgrade that will be required as part of the proposed development.

Applicant's Response:

We acknowledge that a Service Advice Notice will need to be requested as part of the proposed development, however this can occur post PDA development approval. We confirm that the Applicant is accepting of a condition of the PDA development approval requiring receipt of a Service Advice Notice. This is consistent with the approach discussed with *Economic Development Queensland* at the online meeting on 7 August 2025.

Please refer to the Civil Engineering Response prepared by Burchills at **Attachment 7**.

15. Operational Waste Management Plan

Submit an updated WMP demonstrating the following:

- a. Address the assessment benchmarks in the Refuse Planning scheme policy (PSP) of the current version of City Plan (Version 29).
- b. The WMP and proposal plans are to be updated to demonstrate separate refuse solutions with separate access for residential and non-residential uses in accordance with Section 4.0 of the Refuse PSP.

Note: Access to the residential chute system is to be limited to multiple dwelling floor plates only.

- c. Demonstrate a refuse solution of sufficient design and capacity to cater for the proposed yield and activity in accordance with Section 4.0 of the Refuse PSP.

The Brunswick Street tower (Stage 4) requires a minimum capacity of 11,520L of refuse and recycling for the residential use and a minimum capacity of 17,394L for refuse and 12,354L for recycling are required for the non-residential use.

The Water Street Tower (Stage 5) requires a minimum capacity of 18,320L for refuse and recycling for the residential use and a minimum capacity of 5,935L for refuse and 2,562L of recycling for the non-residential use.

A total minimum capacity of 29,840L (54 x 1,100L) of refuse and recycling for the residential use and a total minimum capacity of 23,329L (21 x 1,100L) for refuse and 14,916L (14 x 1,100L) of recycling for the non-residential use is required.

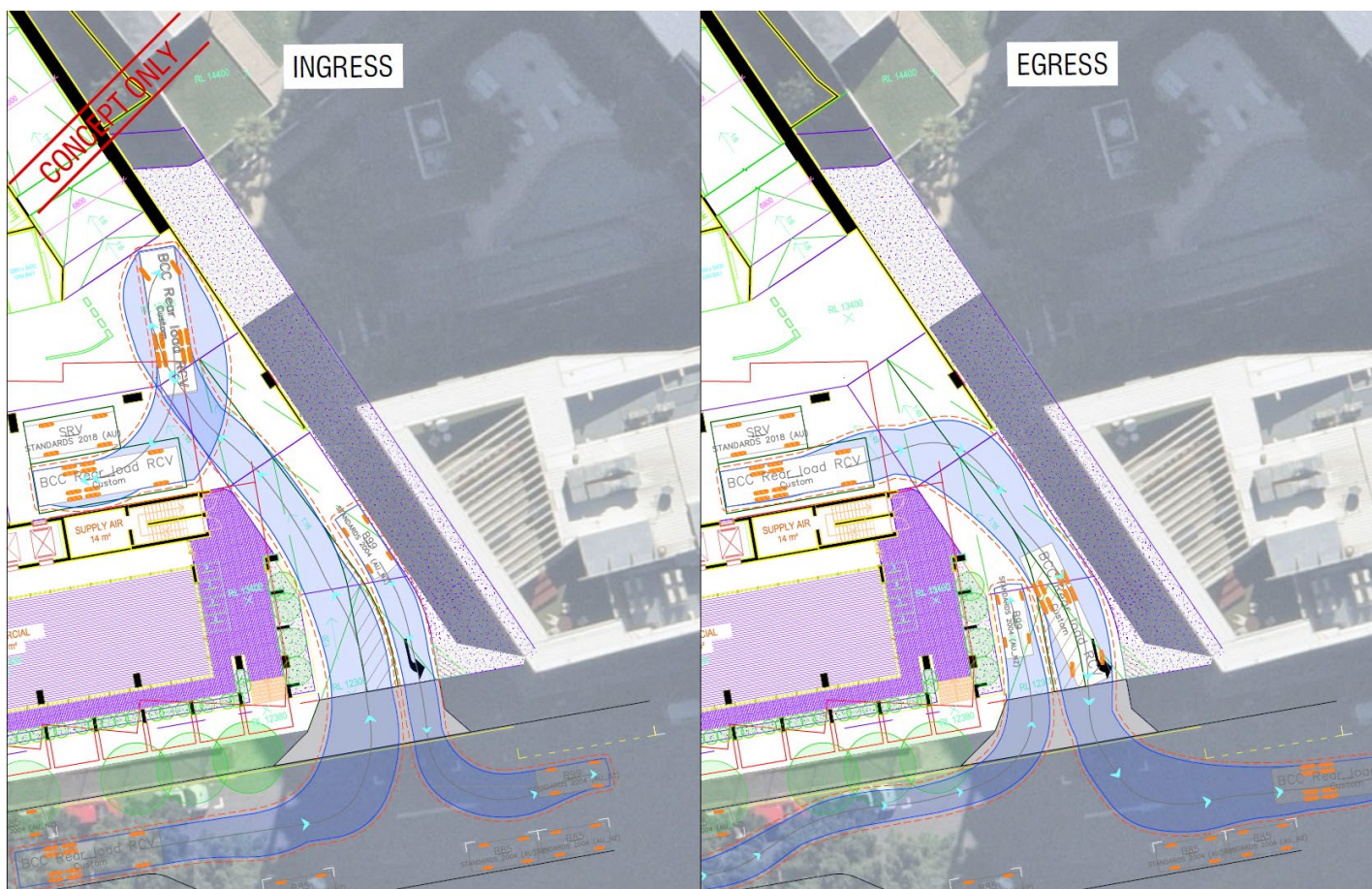
Note: The above figures are based on a performance outcome of three days of service being applied. The above indicative bin numbers do not include bins which are required to remain under chute discharges and are reflective of serviceable bins only. In addition, the above capacity for refuse may be reduced by implementing a reduction technology (i.e. compactor).

- d. Where reduction technology is proposed, the reduction equipment is to be shown on the proposal plans.
- e. The Brunswick Street Tower shows a 'Café' (Food and drink outlet) on the Plaza Level (Sheet no. A-1207), however the GFA has not been demonstrated for this use on the proposal plan or the development summary. It is recommended the plans and development summary be updated to accurately reflect this use.
- f. The swept path analysis for the Refuse Collection Vehicle (RCV) is stamped as concept only and does not provide the design parameters used to undertake the swept path analysis. It is also noted the swept path analysis for the RCV (rear loader) conflicts with the SRV bay on both the ingress and egress. It is recommended the Traffic Impact Assessment be updated and certified by an RPEQ to suitably demonstrate the site can be serviced safely and efficiently.

Applicant's Response:

Please refer to the Revised Waste Management Plan prepared by SLR Consulting at **Attachment 6**. It is noted that the swept path analysis is provided in the Revised Traffic Impact Statement at **Attachment 9**, however for completeness these have been extracted below. The key amendments to the waste strategy include:

- Increase in number of bin rooms from two (2) to four (4), located on Lower Ground levels of both the Water and Brunswick Street Towers.
- The bin store areas have been further amended to show the different waste stream storage areas for each land use proposed. These areas are of adequate size and dimensions to cater for the minimum capacity of the waste generated by the proposed development.
- Collection will occur from the loading bays adjacent to the Water Street bin storage room (please refer to Extract 13 below, demonstrating the swept path analysis for the RCVs that will service the development). Collection for all waste streams will occur three times a week, in accordance with the following:
 - Residential collection will occur via council collection.
 - Short-term accommodation, commercial and retail collection will occur via commercial contractor collection.



Extract 14 – Refuse Collection Vehicle Swept Paths
Source – SLR Consulting

16. 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.

The proposal is in close proximity to an overland flow path of significant concern. To ensure the safety and regulatory compliance of the development, particularly relating to the South Tower and its surrounding areas, we request the following information:

- Evidence demonstrating that the south Tower is situated outside the overland flood extent.
- Assurance that the existing topography, which is affected by the 2% AEP flood extent, will remain unaltered or unconstrained post-development, preserving the area's flood conveyance capacity.

Applicant's Response:

Please refer to the Civil Engineering Response prepared by Burchills at **Attachment 7**.

Specifically, section 3.7 of the Stormwater Management Plan provides an impact analysis arising due to the Overland Flow Path and provides recommendations as to minimum basement ramp levels (RL12.95m AHD), noting the proposal plans exceed this level (13.40m AHD). The response from Burchills at **Attachment 7** references the levels outlined in the submitted Flood Assessment and the proposal's sufficient compliance. Furthermore,

the building is sited in the same location as the previously approved development, ensuring there is no change in the planning outcome or impact relative to the current approval.

17. Flood Emergency Management Plan

Were required, submit a comprehensive Flood Emergency Management Plan (FEMP) that conforms to Section 8.2.11.2, P010, and P011 of the Brisbane City Council (BCC) Flood Overlay Code. This plan should be prepared/endorsed by a Registered Professional Engineer of Queensland (RPEQ) specialising in hydraulics/flood risk management and should detail the necessary flood management strategies that do not impose additional responsibilities on Council and State Emergency Service (SES) personnel during flood events.

Applicant's Response:

Please refer to the Civil Engineering Response prepared by Burchills at **Attachment 7**.

18. Stormwater Management Strategy

The proposed stormwater management measures as outlined in the conceptual stormwater management plan, dated December 2023 and prepared by Coote Burchills Engineering, includes implementing a 185m³ detention tank and ATLAN treatment systems. Submit further details/ and or updated plans as follows:

- a. A design solution to connect the outflow from the detention tank directly to the subsurface drainage network to mitigate any disruption to road users. The proposal to discharge stormwater via kerb adapters at 30L/s has the potential to cause long-term inconvenience and nuisance to road users.
- b. Detailed plans demonstrating the inlets and outlets of both the detention and treatment systems. These plans should also verify that the outflow will be connected to the designated lawful point of discharge by gravity, without reliance on pumped systems.

Applicant's Response:

Please refer to the Civil Engineering Response prepared by Burchills at **Attachment 7**.

19. Dewatering Management Plan

Submit a Dewatering Management Plan (DMP) prepared by a RPEQ with the relevant discipline. The DMP should include the following elements at least:

- a. Site assessment
- b. Regulatory compliance
- c. Dewatering methods
- d. Water treatment
- e. Water disposal
- f. Erosion and Sediment Control
- g. Monitoring and Maintenance
- h. Health & Safety
- i. Documentations & Reporting
- j. Post Construction Elements

k. Community and environmental Considerations

While tanked basements are designed to be waterproof, incorporating a dewatering management system is often advisable, particularly in areas with high groundwater levels or significant hydrostatic pressure. This combination provides a more robust solution against water ingress and protects the basement over the long term. The applicant did not provide any Geotechnical Report and Ground Water Investigation with the application and the lowest basement level shows RL0.2m.

Applicant's Response:

We acknowledge that a Dewatering Management Plan will be required to support delivery of the project, however this detailed information can be provided following Detailed Design and confirmation of the construction methodology, which is a standard approach. We confirm that the Applicant is accepting of a condition of the PDA development approval requiring the preparation and endorsement of a Dewatering Management Plan prior to commencement of site works. Following issuance of the Further Issues Letter, *Economic Development Queensland* has agreed to include the required outcomes for Item 19 as a condition of the PDA development approval.

20. Acoustic Report

Following a review of the submitted Acoustic Report, it is noted that the report did not identify the major sources and locations of noise impact elements. EDQ is therefore unable to understand how these elements will be used to comply with the requirements as per the table listed in the Acoustic report.

Submit an updated Acoustic Report after finalising the major sources and locations of the noise impact elements. It is suggested two more locations (around swimming pool and basement level 2 or 3) are consider for noise impact when preparing an updated report.

Applicant's Response:

Please refer to the Revised Noise Impact Assessment prepared by WSP at **Attachment 8**.

Outlined within Section 4.2 of the revised Noise Impact Assessment, the following building services infrastructure has been identified as having potential to contribute to onsite noise emissions:

- Ground Levels – Basement, Upper & Lower
 - Carpark exhaust systems
 - Stairwell supply air plant
 - Communications room equipment
- Residential Tower Levels – Level 1 to 35
 - Air-conditioning condenser units
- Roof Terrace
 - Pool plant operations, including associated pumps

The precise locations of these elements are illustrated on the Amended Proposal Plans at **Attachment 2**.

Following the design revisions, it is confirmed that the combined noise emissions from all identified plant can be effectively managed to remain within the applicable limits. Control measures have been integrated to ensure compliance with relevant noise standards and to safeguard residential and public amenity.

21. Traffic Impact Assessment

A number of elements were omitted from the submitted Traffic Impact Assessment and requires revision as outlined below.

Submit a revised TIA including the following:

- a. Provide a review of the traffic generated from the proposal and the impacts on the external traffic and transport network in context of ultimate development scenario for the site and surrounds.
- b. Identify a pedestrian movement strategy/plan into and within the development site and demonstrate that the operation and configuration of the layout is adequate with regard safety of pedestrians.
- c. The text used in swept path is contaminated showing only dots. Please updated the swept path layouts with proper texts.
- d. For the entry ramp from Water Street, please add a divider (as per AS2890.1, Section 2.5.2 (b)) between entry and exit path from the property boundary to control gate as the entry we classify as circular entry.
- e. The minimum aisle width within the car park layout is 6.0m, with the exclusion of the Waste Collection Vehicle which is required as per recommended as per the proposed Waste Management Plan (in some instances, the proposed development includes aisle widths less than 6.0m). Provide an amended car park layout plan complying with the relevant requirements.
- f. In Water Street Lower Ground Plan View (Drawing A1205), illustrate the control point for entry to identify clearly the queuing length.
- g. Identify any land resumptions, incl corner truncation part from Road Widening Plan Ref: 16069 Issue 1, dated 9 August 2022.
- h. Identify accessible entries and pathways on parking layout plans.
- i. Quantify any loss of on-street car parking.
- j. Demonstrate Compliance of EOT (End of trip) facilities, including location and number.
- k. Show turn around space at end of blind aisle.
- l. Identify if any external road upgradation (including any intersection upgrade of Brunswick St & Water St and Water St & Trinity St) is warranted because of this proposed development.
- m. Confirm the turn treatments from Water Street are decided in accordance with DTMR Road Planning and Design Manual (Part 4A).
- n. Demonstrate how the existing bus stop on Brunswick Street frontage will remain in operation for the duration of construction.
- o. The provision of 199 bicycle parking spaces is not in accordance with the Scheme. Under Schedule 3, there is a requirement for 373 spaces for residents and 94 spaces for visitors, with an additional 14 spaces for employees and 4 visitor spaces for the Centre activities use(s). Please providing a minimum of 1 bicycle parking space per dwelling and amend the parking layout plan accordingly.

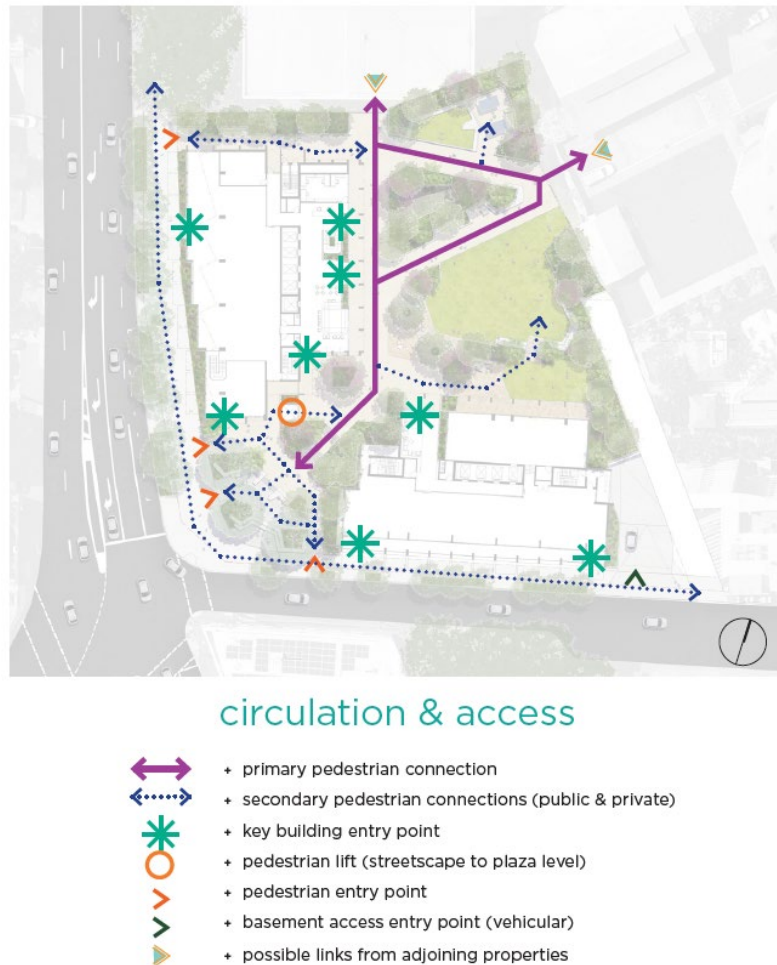
Applicant's Response:

Please refer to the Revised Traffic Impact Statement, with appended response letter, prepared by SLR Consulting at **Attachment 9**. To address the matters raised, the following summary is provided:

- a. A development traffic demand assessment has been undertaken and is provided in Section 8.0 of the Revised Traffic Impact Statement.

Following the meeting with *Economic Development Queensland* on 7 August 2025, the traffic assessment approach was circulated via email on 7 August 2025 as requested. For completeness, this correspondence is included as follows:

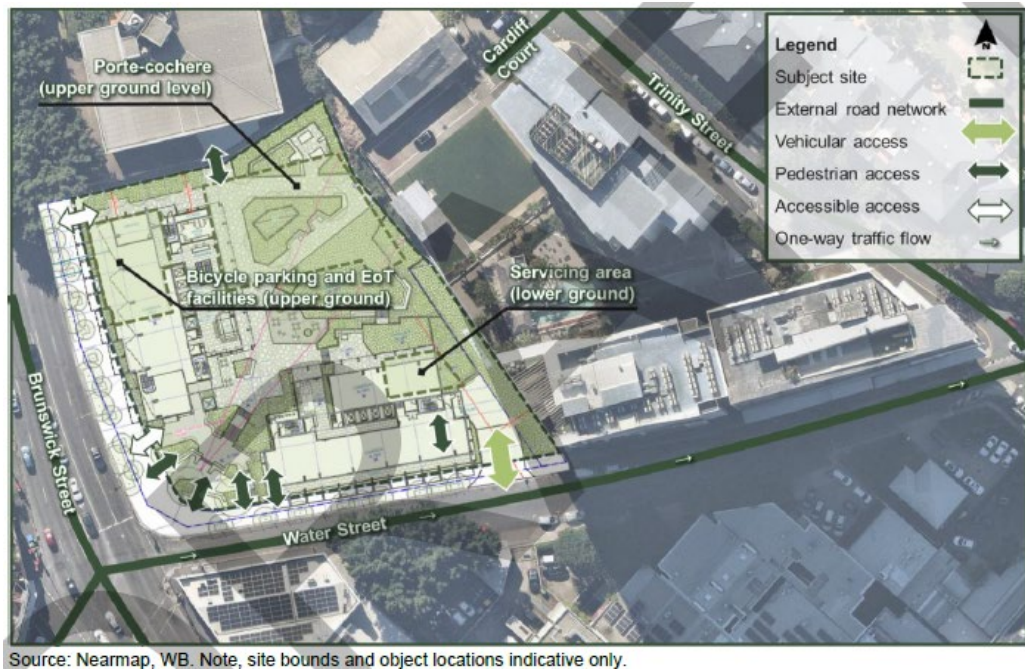
- There is a valid development approval (Approved Development) over the site which could be acted upon today and would generate up to 153 vehicles per hour (vph) during peak hour periods. Of note, no external transport network upgrades were required to be delivered by the Approved Development, only land dedications provided to facilitate future transport network upgrades by others (i.e. similar to that now proposed).
 - The proposed development will generate 86vph during peak hour periods calculated on a 'like-for-like' basis to the Approved Development (which is less than the current approved vehicle movements).
 - In circumstances where the proposed development generates 67vph fewer than the Approved Development, and whereby no external upgrading works were required to support the Approved Development, it is concluded that:
 - The traffic demands and associated impacts of the proposed development would be significant less than that of the Approved Development at any point on the adjoining road network, even considering the site access arrangements now proposed;
 - Accordingly, no operational assessment is warranted, and no external upgrading works are required to accommodate the development.
 - Further to the above, it is understood that the proposed development is consistent with that planned for the site by *Brisbane City Council* and *Economic Development Queensland*. Given that the proposed development is consistent with *Brisbane City Council* and *Economic Development Queensland* land use and infrastructure planning, that the development will be required to pay contributions for infrastructure to *Economic Development Queensland* (i.e. by way of 'development charges') in accordance with the Bowen Hills Priority Development Area Development Charges and Offset Plan (DCOP), and land dedications will be provided to facilitate future upgrades of the surrounding road network by others (i.e. Council), this too supports no further assessment, or upgrading, of the surrounding transport networks.
 - Finally, given the location of the site within the 'City Core', whereby trips by private vehicles are discouraged and trips by alternate transport modes (i.e. active and public transport) are encouraged, traffic operational assessments are not a typical requirement, particularly when a significant net reduction in vehicle trips is proposed. Furthermore, any upgrades of the adjoining road network to increase traffic capacity are undesirable, as this would increase the attractiveness of private vehicle trips, which would be counter to the transport objectives of the City Plan for the 'City Core'.
- b. The pedestrian circulation and access strategy is included at page 14 of the Revised Landscape Report at **Attachment 4** as extracted below.



Extract 15 – Pedestrian Circulation and Access Strategy

Source – Lat Studios

- c. Revised swept path assessments are provided at Appendix C of the Revised Traffic Impact Statement.
- d. A line marked central median has now been provided, as demonstrated at **Appendix C** of the Revised Traffic Impact Statement, which satisfies the relevant AS2890.1 requirements.
- e. As outlined in Section 7.3 of the Revised Traffic Impact Statement, no change is required to the proposed car parking aisle widths as the car park layout is compliant with the relevant standards.
- f. The control point for the site is the southern approach to the loading area, which is separated approximately 18m from the property boundary to Water Street.
- g. The proposed development is consistent with the requested land dedications along the Brunswick Street and Water Street frontages as part of Road Widening Plan Ref: 16069 Issue 1, dated 9 August 2022.
- h. Accessible entries and pathways are shown at Figure 3, as extracted below, and discussed at Section 5.2 of the Revised Traffic Impact Statement.



Extract 16 – Accessible Access
Source – SLR Consulting

- i. Since the original Traffic Impact Statement was prepared on-street parking has increased from zero (0) spaces to eight (8) spaces along the Water Street frontage. Consequently, it is proposed that three (3) on-street parking spaces will need to be removed to achieve minimum access sightlines in accordance with AS2890.1. Given the location of the proposed development within the City Core of the *Brisbane City Plan 2014* and provision for parking within the proposed development, it is considered that the removal of these on-street parking spaces is reasonable, consistent with the *Brisbane City Plan 2014*, and inconsequential in terms of traffic impacts.
- j. End of Trip facilities is addressed in Section 4.2 of the Revised Traffic Impact Statement, which confirms compliance with the requirements of the *Transport, Access, Parking, and Servicing Planning Scheme Policy*. The following end of trip facilities are proposed, which will be located in the northwest corner of the upper ground level:
 - 30 lockers (i.e. two (2) lockers per secure bicycle parking space);
 - Five (5) shower/changeroom cubicles (i.e. one (1) unisex PWD, two (2) male, two (2) female); and
 - Toilets and hand basins.
- k. The only turnaround space required is within the northwestern corner of the visitor parking area on the lower ground parking level, which has been incorporated into the Amended Proposal Plans at **Attachment 3**. Revised swept path assessments are provided at Appendix C of the Revised Traffic Impact Statement, demonstrating turnaround provisions for a B99 vehicle.
- l. No external upgrading works, beyond the frontage works previously proposed, are required to accommodate the traffic demands associated with the proposed development.
- m. A turn treatment for the proposal is not necessary as the site access is a driveway to a low speed, urban environment with left-in entry movements only.
- n. There is no current proposal that requires closure of the existing Brunswick Street bus stop during construction, however should this change through construction then this can be managed via a Construction Management Plan.

- o. As outlined in Section 4.1 of the Revised Traffic Impact Statement, the bicycle parking provision has been reconsidered as outlined below and now exceeds prescribed minimums of:
- 15 secure spaces for employees;
 - 453 secure spaces for residents; and
 - 120 visitor spaces.

This means the prescribed total bicycle parking required is 588 spaces, with the proposed development providing a total of **627** bicycle parking spaces, exceeding the prescribed minimum by 39 bicycle spaces.

22. Acid Sulfate Soil Management Plan

The site is impacted by Brisbane City Council's Potential and Actual Acid Sulfate Soils layer. As such, submit an Acid Sulphate Management Plan (prepared by an expert with the relevant discipline) as per BCC's Guidelines and Standard (SC6.25).

Applicant's Response:

We acknowledge that an Acid Sulfate Soil Management Plan will be required to support delivery of the project, however this detailed information can be provided following Detailed Design and confirmation of the construction methodology, which is a standard approach. We confirm that the Applicant is accepting of a condition of the PDA development approval requiring the preparation and endorsement of an Acid Sulfate Soil Management Plan prior to commencement of site works.

23. Air Quality Assessment

The subject site (specially the tower on the western side) is significantly impacted by BCC's Transport Air Quality A and Transport Air Quality B layers. As such, submit an Air Quality Assessment Report as per BCC's Guidelines and Standard (SC6.2).

Applicant's Response:

The proposal complies with Section A of the Transport air quality corridor overlay code through the installation of ducted mechanical ventilation systems and air conditioning, in accordance with Acceptable Outcome A01(b)(ii). Furthermore, the building is sited in the same location as the previously approved development, ensuring there is no change in the planning outcome or impact relative to the current approval. Should it be required, the Applicant is willing to provide a detailed Air Quality Assessment to Economic Development Queensland for review and endorsement at a later stage.

24. Bus Stop on Brunswick Street

As stated within 21n) the existing Brisbane City Council bus stop on Brunswick Street will need to continue to be operational during any future construction on the site.

Applicant's Response:

As outlined in the response to Item 21 above, there is no current proposal that requires closure of the existing Brunswick Street bus stop during construction, however should this change through construction then this can be managed via a Construction Management Plan. We confirm that the Applicant is accepting of a condition of the PDA development approval requiring the preparation and endorsement of a Construction Management Plan that includes the required outcome of Item 24.

SUMMARY

This correspondence represents all of the information requested by *Economic Development Queensland* and we hereby request *Economic Development Queensland* finalise their assessment of the application.

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 (Director), Grace Forno (Senior Town Planner) or the undersigned on 07 3254 1566.

Yours faithfully,

Property Projects Australia Pty Ltd



Jonathan See

Principal Town Planner

Enc. **Attachment 1** – Further Issues Letter
 Attachment 2 – Information Request Response
 Attachment 3 – Amended Proposal Plans
 Attachment 4 – Revised Landscape Report
 Attachment 5 – Wind Assessment
 Attachment 6 – Revised Waste Management Plan
 Attachment 7 – Civil Engineering Response
 Attachment 8 – Revised Noise Impact Assessment
 Attachment 9 – Revised Traffic Impact Statement