Attachment 6.2

Building configuration

Use of the term ‘Tower’

11 February 2021
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1. Purpose of report

On 27 October 2020, Council resolved (G20.1027.033) to make a number of refinements to the Major update 2 & 3 amendment package (the amendment) to better align with the endorsed policy intent and improve clarity for development assessment purposes.

This report provides analysis and recommendations to resolve the following item from the resolution.

  j. There is uncertainty about the term ‘tower’, as it is not defined.

2. Introduction

As part of the Scenario testing, it was observed that there was a lack of clarity on what constitutes a ‘Tower’ building in City Plan.

This results in uncertainty on whether certain provisions apply, including:

- ‘Tower’ separation provisions within the High-rise accommodation design code; and
- ‘Tower base’ set back provisions and maximum heights in the Light rail urban renewal area overlay code.

The reassessment of a High-rise accommodation development at 238 Marine Parade, Labrador against the proposed changes within the High-rise accommodation design code, identified a lack of clarity on what constitutes a ‘Tower’ building when considering provisions specific to separation distances between towers. The Assessment officer was unable to determine if the existing 21m residential building on the adjacent site constituted a ‘tower’ and would therefore warrant application of the separation provisions on the proposed new 52m high building.

Figure 1 shows the location of the site at 238 Marine Parade subject to the proposed 52m building (Yellow rectangle), and the location of the adjacent existing 6 storey (~21m) building (Red square). Figure 2 shows the adjacent existing 6 storey (~21m) building.
It should be noted that the term ‘Tower’ has always been used in City Plan. The main change to the use of this term in the amendment relates to ‘Tower bases’.

A ‘Tower base’ is what the current City Plan refers to as a ‘Podium’, being the projecting lower part of a building. However, as the ‘Tower base’ definition has a link to the term ‘Tower’, the Setback and Height provisions are not applicable to the base of non-tower buildings, potentially creating gaps or inconsistencies in their application.

Scenario testing of a Multiple accommodation development within the Light rail urban renewal area overlay at 95-97 Old Burleigh Road, Broadbeach, identified a lack of clarity on what constitutes a ‘Tower base’ within the revised provisions of the Light rail urban renewal area overlay code.

The reassessment noted it was unclear if the building form in question should be considered a ‘Tower base’ for the purposes of the Acceptable outcomes, which would determine the appropriate setback provisions to apply. Again, this was due to the ‘Tower base’ definition relying on understanding what a ‘Tower’ building is. Figures 3 and 4 show the built form of the 28.4m subject building at 95-97 Old Burleigh Road, Broadbeach.

3. Background to the amendments

3.1 High-rise accommodation design code

The changes to the High-rise accommodation design code were introduced as part of Item 9: Built form and urban design outcomes of the amendment.

The Built form, Setbacks and Site cover provisions in the amendment were informed by the following projects:

- Community Benefit Bonus Elements Policy Review; and
- Setbacks and Site Cover in Medium and High Density Residential Zones Review.

The amendment included an extensive range of improvements to better regulate Medium and High-rise developments. The requirements for Urban and architectural design were strengthened through new and revised Overall outcomes, Required outcomes, Performance outcomes and Acceptable outcomes. In addition, the purpose and structure of the assessment benchmarks were revised to improve useability and line of sight.
Under the amendment, the High-rise accommodation design code, along with relevant other codes, were revised to align with the proposed urban and architectural design principles. This included a revision of separation requirements for towers.

The building separation requirements in the High-rise accommodation design code are applicable in addition to zone code requirements to ensure no conflict between provisions.

It should be noted that there was no change to the term ‘Tower’; this has always been a term utilised in City Plan.

Council endorsed these proposed changes to the High-rise accommodation design code on 23 March 2018 (G18.0323.027).

### 3.2 The Light rail urban renewal area overlay

A revised Light rail urban renewal area overlay code was included as part of the amendment. The overlay provides four individual precincts to represent the role and function of the area in which they are located.

Setbacks, Site cover and Floor plate requirements were introduced into the Light rail urban renewal area overlay code to provide for the variations in the precincts, including specific provisions for ‘Tower bases’. Areas outside the Overlay area rely on the default provisions in the respective underlying Zone code.

The character of each precinct is deliberate and influenced by specific Built form, Setbacks and Site cover provisions. A description of each precinct within the Overlay is outlined below:

**Primary focus areas:** Primary focus areas have the highest concentrations of activity, including a wide range of non-residential activities incorporated in the ground level, supported by high density residential and tourist accommodation activities.

**Secondary focus areas:** Secondary focus areas include a range of high density residential activities and small-scale non-residential activities that serve the local community’s daily needs, and do not undermine the Surfers Paradise or Broadbeach centres.

**Frame areas:** Frame areas contain mostly residential activities which reinforces the planned character of individual neighbourhoods.

**Transition areas:** Transition areas include low-medium and medium density residential activities, delivering a deliberate transition in scale, form and intensity from other parts of the light rail urban renewal area.

The Built form, Setbacks and Site cover provisions in the amendment which shaped each precinct within the overlay were informed by the following projects:

- Community Benefit Bonus Elements Policy Review;
- Setbacks and Site Cover in Medium and High Density Residential Zones Review;
- Urban Ground Guideline policy;
- Introduction of the Low-medium density residential zone; and
- Light Rail Built Form Review (Podium Design).

These amendments collectively formed part of Item 9: Built form and urban design outcomes in the amendment package.

### 3.3 Tower base definition

A ‘Tower base’ is what City Plan currently describes as a ‘Podium’, being the projecting lower part of a building.

The lower floors of buildings can deliver a well-defined, active and lively, spatially rich and responsive urban realm.
The ‘Urban Ground’ is another way of describing the important first four floors of a building (max. 16m) that create the human-scale experience of the city and describes the building form that frames our city’s streets and public places.

A new Administrative definition of ‘Tower base’ was proposed in the amendment to align with the new built form terminology following the Light Rail Built Form Review (Podium Design) and Community Benefit Bonus Elements Policy Review. The tower base definition was endorsed by Council on 29 May 2018 (G18.0529.018). The tower base definition included in the amendment is:

“Tower base means the lower part of a tower building, between ground level and the point where the lower part is clearly distinguishable from the upper part of the tower building, having regard to elements such as, but not limited to, bulk and setbacks. Recreational areas located on top of the tower base do not form part of the tower base.”

4. Analysis

The scenario testing observed a lack of clarity in applying the following provisions from the amendment:

- AO4.2 of the High-rise accommodation design code – referring to ‘Tower’ separation provisions; and
- AO15.1 of the Light rail urban renewal area overlay code - referring to ‘Tower base’ setback provisions in the Setback, site cover and floor plate requirements table in the code.

As part of this review, other references to ‘Tower’ and ‘Tower base’ which are proposed in the amendment have been reviewed.

Section 4.1 relates to the term ‘Tower’ and Section 4.2 relates to the use of the term ‘Tower base’.

4.1 Use of the term ‘Tower’

In determining the most appropriate solution to these issues, the following items were considered:

- The use of the term ‘Tower’ in City Plan
- The Macquarie dictionary definition of ‘Tower’
- Definition of ‘Tower’ in other cities
- Potential for a ‘Tower’ definition within City Plan
- The intent of the ‘Tower’ separation provisions within the High-rise accommodation design code
- Testing the change of wording from ‘Tower’ to ‘buildings greater than 33m in height’ within the High-rise accommodation design code.

The term ‘Tower’ has been used in City Plan since its introduction in 2016 and prior to that in the superseded Planning Scheme (2003). However, it does not have a definition under Schedule 1 of City Plan.

City Plan refers to ‘Tower’ in the context of Medium and High-rise building development, both residential and commercial. Generally, this is in reference to an aspiration of the type of built form the City seeks in certain areas, for example ‘tall slender towers’, or ‘innovative towers...that advance the Gold Coasts iconic skyline’. This aligns with how many other cities globally use the term ‘Tower’.

The term ‘Telecommunications tower’ is also used in City Plan and has been appropriately defined to ensure the relevant infrastructure is inferred only (and not building towers).

The Macquarie dictionary definition of ‘Tower’

Where a term is not defined by City Plan, the Planning Act, Planning Regulation or Acts Interpretation Act, reference is given to the ordinary meaning of the term. The Macquarie dictionary defines ‘Tower’ as:
“a building or structure high in proportion to its lateral dimensions, either isolated or forming part of any building”.

This definition acknowledges that the height of a tower is proportional to each building and site, rather than being a fixed/consistent height.

**Other Planning Schemes’ definition of ‘Tower’**

A review of how ‘Tower’ was defined in six other cities planning schemes has been undertaken. From the review it was observed that it is not a commonly defined administrative term in general, with most of the other planning schemes reviewed being silent on an administrative definition. Of the occurrences where ‘Tower’ was an administratively defined term, the definitions varied extensively with only a few providing a designated height. See Appendix E for further information on these definitions.

**Potential ‘Tower’ definition within City Plan**

The term ‘Tower’ is ubiquitous in most planning schemes globally as it is a recognised architectural built form. However, the variability and scarcity with which ‘Tower’ was defined in other planning schemes, served to reinforce the concerns that ‘Tower’ is too fluid of a design term to define without potential unintended consequences, and without a height designation may create additional confusion for City Plan users.

While defining a tower is not impossible, it would require a reassessment of all related policy in City Plan to ensure appropriate alignment. This is out of scope of this review, as it would affect existing content in City Plan, not just content proposed in the amendment.

Based on this review, it is not recommended an Administrative definition of ‘Tower’ be included in the amendment. This will mean that Macquarie dictionary definition will apply where guidance is needed.

To address the issues raised, this analysis looks at how the amendment provisions can more expressly state the outcomes sought, without referencing the term ‘Tower’.

The options of defining the term or addressing the issues through changed provisions have been further evaluated in Section 4.4.

**4.1.1 Tower separation distances under the High-rise accommodation design code**

The reassessment of a proposal at 238 Marine Parade, Labrador identified that the height of the proposed building was 52m and in accordance with Acceptable outcome 4.2 (AO4.2) (shown below), a 16m setback to any adjacent ‘Tower’ is required. The existing building on the adjacent site in this scenario was 6 storeys (~21m) in height.

There was uncertainty as to the applicability of the particular provision because officers questioned whether the existing adjacent building was a ‘Tower’. Officers noted that there is no definition of ‘Tower’ provided in City Plan and this is problematic when trying to determine which provisions apply.
Extract from Table 9.3.9-1: High-rise accommodation design code – for assessable development

<table>
<thead>
<tr>
<th>Tower form and design</th>
<th>PO2</th>
<th>AO2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development provides a tower form that minimises dominance through:</td>
<td>Development provides a tower form that minimises dominance through:</td>
<td>No acceptable outcome provided.</td>
</tr>
<tr>
<td>(a) reducing the appearance of building bulk with variations in the horizontal and vertical profile; and</td>
<td>(a) reducing the appearance of building bulk with variations in the horizontal and vertical profile; and</td>
<td></td>
</tr>
<tr>
<td>(b) incorporates high quality materials, with a range of textures, colours and finishes.</td>
<td>(b) incorporates high quality materials, with a range of textures, colours and finishes.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PO3</th>
<th>AO3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development provides a slender tower form that reduces the scale and bulk of the building and promotes:</td>
<td>Development provides a slender tower form that reduces the scale and bulk of the building and promotes:</td>
</tr>
<tr>
<td>(a) an open, attractive and distinct skyline;</td>
<td>No acceptable outcome provided.</td>
</tr>
<tr>
<td>(b) slender, fast moving shadows; and</td>
<td></td>
</tr>
<tr>
<td>(c) retention of local view corridors.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PO4</th>
<th>AO4.1</th>
<th>AO4.2</th>
<th>AO4.3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development provides for well-spaced towers, which:</td>
<td>Tower form (including balconies) along:</td>
<td>New towers are separated from any existing or approved towers, adjacent or on-site, by a minimum distance of:</td>
<td>Tower form is coordinated to off-set with adjacent existing and proposed towers.</td>
</tr>
<tr>
<td>(a) allow for light penetration, air circulation and a reasonable level of residential amenity for occupants of the development and adjoining sites;</td>
<td>(a) single frontages and dual frontages where not on a corner, step in at least 3m from the tower base; or</td>
<td>(a) 16m, where built form is up to 55m in height; or</td>
<td></td>
</tr>
<tr>
<td>(b) are of a scale and form appropriate to the characteristics of the site; and</td>
<td>(b) corner frontages can have up to 1/3 tower width extend straight down at the corner point to reinforce the intersection if negative ground level wind effects are mitigated.</td>
<td>(b) 20m, where built form is greater than 55m in height.</td>
<td></td>
</tr>
<tr>
<td>(c) use design elements to contribute to varied, interesting and visually attractive streetscapes.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Note: Blue highlight indicates the relevant provision

The intent of the ‘Tower’ separation provisions within the High-rise accommodation design code

The High-rise accommodation design code is only applicable to buildings over 33m in height. The purpose of the code is to:

“...ensure development is responsive, connected, engaged, subtropical, attractive and adaptable to deliver diverse and innovative tower forms that enhance the city image”

A review of the intent of the High-rise accommodation design code reiterated that the separation provisions are applicable to buildings (over 33m in height) on the site and on adjoining sites to ensure development provides for natural light and ventilation to the development, minimises the impact of development on the amenity and privacy of neighbouring existing residents, and considers future development. The impacts being considered by these provisions are applicable to any tall buildings in general, not just tall ‘Tower’ forms.

Replacing the term ‘Towers’ with ‘buildings greater than 33m in height’ for this provision, and similar related provisions in this code, would provide greater certainty as to what buildings the separation provisions apply to.

Testing the change of wording from ‘tower’ to ‘buildings greater than 33m in height’

In applying the proposed wording change to some hypothetical development scenarios in the City, officers believe that the change of wording within the relevant provisions in the High-rise accommodation design code
would not undermine the policy intent of the code. The wording change when tested in various hypothetical development scenarios was determined to provide improved clarity of the policy intent.

### 4.2 Use of the term ‘Tower base’

During scenario testing officers observed a lack of clarity on what constitutes a ‘Tower base’ within the Light rail urban renewal area overlay code provisions. Officers noted that it was unclear if the building form in question should be considered a tower base for the purposes of the Acceptable outcomes, which would then determine the appropriate setback provisions to apply.

This uncertainty was due to the definition in the amendment of ‘Tower base’ which refers to a ‘Tower building’. This caused uncertainty due to the lack of ‘Tower’ definition in City Plan.

City Plan ‘Tower base’ definition within the Major update 2 & 3 amendment package is as follows:

> “Tower base means the lower part of a tower building, between ground level and the point where the lower part is clearly distinguishable from the upper part of the tower building, having regard to elements such as, but not limited to, bulk and setbacks. Recreational areas located on top of the tower base do not form part of the tower base.”

The link to ‘Tower building’ means that the base of non-tower buildings is not captured (see Figure 5).

![Figure 5: Example of a base at a Tower building ('Tower base') and a non-tower building (not expressly controlled or provided for in the amendment)](image)

The amendment includes a number of controls for Tower bases, including maximum heights, setbacks, and locations in the City where they are envisaged.

For example, the Strategic framework provides for an 8m maximum height for tower bases in the Frame area of the Light rail urban renewal area. The height control should apply equally to the protruding base of buildings, regardless of whether the building above is a ‘Tower’ or not.

A change to the amendment would be needed to provide provisions for the ‘base’ of non-tower buildings.

#### 4.2.1 Tower bases in the Light rail urban renewal area overlay code

As part of the amendment, the designated height, setbacks and site cover of the tower base were drafted to provide a reduction of built form intensity away from the Primary focus area.

The Urban Ground Guideline notes that the ‘ground plane’ (being the lower floors of buildings) provides “well-defined, active and lively” spaces which “create the human scale experience of the city”. Specifically, within the
Primary and Secondary focus areas City Plan desires ‘Tower bases’ to be built to the street edge to ‘create a sense of enclosure’.

The Overall outcomes and Performance outcomes in the Light rail urban renewal area overlay code provides Setback and Site cover provisions for ‘Towers’ and ‘Tower bases’ only. This creates an inconsistency of regulation for other building forms, such as, non-tower buildings, a stand-alone shop or a community use.

The Acceptable outcome does provide setbacks and site cover for all buildings, however, there is a misalignment with the higher order provisions.

The misalignment means detailed outcomes sought by the Overlay code are not provided for all building types. The Overlay code promotes a ‘sense of enclosure at the street level’ in the Primary and Secondary focus areas, in accordance with the Urban Ground Guideline Policy (as discussed in Section 3.2 of this report), which is not provided for in the Acceptable outcomes for non-tower building types.

The extract of the Setback and Site cover table from the Overlay code, below, shows these differences between the ‘Tower base’ setbacks and relevant ‘building’ setbacks (first two rows) for the Primary focus area. Figure 6 shows the variation in Setback and Site cover provisions for ‘Tower base’ and ‘Towers’ in the Primary and Secondary focus areas and Frame area. Figure 7 shows Setback and Site cover provisions for non-tower buildings. Note the reduced front setbacks, which contribute to creating a sense of enclosure, are not provided for due to this being linked to ‘Tower base’ form.

Extract from Light rail urban renewal area overlay code: Table 8.2.12-3: Setback, site cover and floor plate requirements – Primary focus areas

<table>
<thead>
<tr>
<th>Development Category</th>
<th>Front setback (m)</th>
<th>Side Setback (m)</th>
<th>Rear Setback (m)</th>
<th>Site cover</th>
<th>Maximum floor plate</th>
<th>Setbacks between on site habitable buildings (where not attached)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tower base (up to 16m in height)</td>
<td>0m</td>
<td>0m</td>
<td>0m</td>
<td>90%</td>
<td>No provisions</td>
<td>Not applicable</td>
</tr>
<tr>
<td>Buildings greater than 9m and up to 16m in height</td>
<td>4m</td>
<td>3m</td>
<td>4m</td>
<td>60%</td>
<td>No provisions</td>
<td>Double the applicable side setbacks</td>
</tr>
<tr>
<td>For covered car parking at grade: 6m</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Buildings greater than 16m and up to 33m in height</td>
<td>4m</td>
<td>4m</td>
<td>4m</td>
<td>50%</td>
<td>No provisions</td>
<td>Double the applicable side setbacks</td>
</tr>
<tr>
<td>For covered car parking at grade: 6m</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Buildings greater than 33m and up to 55m</td>
<td>4m</td>
<td>5m</td>
<td>5m</td>
<td>40%</td>
<td>750m² (excluding balconies)</td>
<td>Double the applicable side setbacks</td>
</tr>
</tbody>
</table>
City Plan envisages higher intensity urban activity in certain locations, specifically as detailed in the purpose of the Primary and Secondary focus areas of the Light rail urban renewal area overlay. In those areas, tower bases provide a critical role in street activation and amenity and, as a result, are a desirable feature.

However, tower bases are just one building base that can contribute to the ‘Urban ground’ of a city, and can consist of various elements such as commercial, administrative, recreational and residential uses as well as access foyers and car parking. Mid-rise buildings can also contribute well designed building base outcomes that contribute to street activation and create a sense of enclosure.

These types of forms are not specifically provided for in the amendment. Currently, the amendment only contemplates reduced setbacks, which facilitate street enclosure and activation, in buildings with a ‘Tower’.
The Frame and Transition areas are not seeking a sense of enclosure at the street (pedestrian level), rather they seek an open and landscaped area that becomes more open in the Transition areas. This outcome is provided for with both the ‘Tower base’ and building setbacks, however, there is still an inconsistency with the Setback provisions at the ground level. As above, the Overall outcomes and Performance outcomes relate only to ‘Towers’ and ‘Tower bases’ in the Frame and Transition areas.

4.2.2 Opportunities

In determining the most appropriate solution to the issues identified during scenario testing, being:

1. Tower base definition is problematic as it relies on understanding what a ‘Tower’ is; and
2. Tower base setback provisions did not appear to align with the architectural intent of the policy to create a ‘sense of enclosure at the street level’ in accordance with the Urban Ground Guideline Policy,

The following items were considered:

- The intent of the ‘Tower base’ Setback, Site cover and Floor plate provisions for the relevant Focus areas within the Light rail urban renewal area overlay code
- Review of the Urban Ground Guidelines in the context of the Light rail urban renewal area overlay code
- Consideration of the unfavourable option of drafting a new Administrative definition for ‘Tower’
- Benefits of an amended definition for ‘Tower base’

Intent of the ‘Tower base’ setbacks, Site cover and Floor plate provisions in the Light rail urban renewal area overlay code and Urban Ground Guidelines

As noted earlier, tower bases are just one building typology that can contribute to the ‘Urban ground’ of a city, and can consist of various elements such as commercial, administrative, recreational and residential uses as well as access foyers and car parking. Non-tower buildings can also contribute well designed building base outcomes that contribute to street activation and create a sense of enclosure.

Consideration of options and proposed change to definition

From previous analysis of the issues in Section 4.1 of this report, creating an administrative definition of ‘Tower’ is unfavourable. Therefore, consideration had to be given to revising references to ‘Tower base’ to remove reliance on the term ‘Tower’.

Through review and clarification of the intent of the Light rail urban renewal area overlay code and the Urban Ground Guidelines, it is considered that clarifying the definition of ‘Tower base’ and changing it to ‘Building base’ will provide a solution that addresses the identified issues.

To implement the change in terminology to ‘Building base’, changes would need to be made in City Plan for all incidences where ‘Tower base’ is currently referenced. The following parts of City Plan contain reference to ‘Tower base’, ‘Tower’ or both:

Strategic Framework

- 3.4.2 Element – Architecture and urban design (Tower base)
- 3.4.3 Element – Landscape character (Tower)
- 3.5.2 Element – Mixed use centres (Tower)
- 3.5.3 Element – Specialist centres (Tower)

City Plan codes

- Innovation zone code
- High density residential zone
- Centre zone
- Mixed use code
City officers have reviewed the impact of changing the terms in the relevant sections of City Plan and determined that the policy intent of relevant provisions would not be undermined by the change.

### 4.3 Scope for change

The Major update 2&3 amendment is currently in the public consultation phase of the statutory amendment process under the Minister’s Guidelines and Rules (MGR). The MGR provides that, during this stage of the process, the amendment can only be changed to:

- a) address issues raised in submissions;
- b) amend a drafting error; or
- c) address new or changed planning circumstances or information.

A submission was received regarding concern about proposed provisions being unable to achieve a ‘tall slender tower’ above a tower base at lower heights. The submission noted that the lack of a definition of ‘Tower’ was leaving the provisions open to interpretation and recommended that ‘tall tower’ be defined as a building above 55m.

In addition, the Scenario testing presented to Council in October 2020 is considered to be new planning information. The Scenario testing included the following observations:

1. A lack of clarity on what constitutes a ‘Tower’ building form in City Plan. Specifically, how to apply ‘Tower’ separation provisions within the High-rise accommodation design code when it is unclear as to what is considered a ‘Tower’ as there is no associated administrative definition.

2. A lack of clarity on what constitutes a ‘Tower base’ compared to other built form for the purposes of applying the setbacks, site cover and floor plate requirements defined in the Acceptable outcomes of the Light rail urban renewal area overlay code. This is due to the proposed City Plan definition of ‘Tower base’ relying on the assumption of understanding what a ‘Tower’ building is.

As a result of the Peer review and subsequent Scenario testing as well as the submission, Council is able to change the amendment to make changes to address the interpretation issues within the amendment.

Any change that is ‘significantly different’ is required to undergo further public engagement for a minimum of 20 business days. This matter is discussed within the Options section.

### 4.4 Options

#### 4.4.1 Use of the term ‘Tower’

Three options have been developed following a review of this matter. The options are:

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Add an administrative definition for ‘Tower’</td>
</tr>
<tr>
<td>2</td>
<td>Add an editor’s note within provisions relating to ‘Tower’ that would act to assist in interpretation for the purpose of the provision(s)</td>
</tr>
<tr>
<td>3</td>
<td>Replace the term ‘Tower’ with other descriptions where required to provide greater clarify of when the provisions apply</td>
</tr>
</tbody>
</table>

Note: Blue highlight identifies recommended option.
To determine the Recommended Option, the following advantages and disadvantages were identified and assessed:

<table>
<thead>
<tr>
<th>Proposed Option</th>
<th>Advantages</th>
<th>Disadvantages</th>
</tr>
</thead>
</table>
| 1. Add an Administrative definition for ‘Tower’                                 | • Greater certainty around when provisions that refer to ‘Tower’ apply.      | • The term 'Tower' is currently used in City Plan, which relies on the ordinary meaning of the term, being a consideration of the proportions of a building. Defining the term, to be linked to a specific height would change the original intent of the terms. This could have unintended consequences for implementation.  
• Potential increased pressure on officers to make a judgement call for those buildings that could be considered a tower visually, but do not meet the height definition. |
| 2. Add an Editor’s note within provisions to assist in interpretation of ‘Towers’ in relevant provision(s) | • Could assist in the interpretation of the specific provisions relating to ‘Tower’ built form. | • The note would need to assign a height to be definitive and provide certainty to City Plan users. This could have unintended consequences and may result in gaps for buildings that appear as towers, but do not meet the nominated height. |
| 3. Replace the term ‘Tower’ with other descriptions where required to provide greater clarify of when the provisions apply | • Improved clarity for users of City Plan. Users would not have to determine if the existing adjacent or approved building constitutes a tower form or not.  
• Clarifies the intent of the building separation provisions within the High-rise accommodation design code.  
• Removes the need to provide an administrative definition of tower and avoid potential associated unintended consequences. | None identified. |

After considering the advantages and disadvantages of the three options and the overall policy intent of the amendment, it is recommended that Option 3 be implemented. The change would offer the following benefits:

- It would improve the clarity of separation provisions application within the Overlay code; and
- It would not undermine the policy intent within the Overlay code.

This change is not considered to be ‘significantly different’ and does not require readvertising. However, it is recommended this change be included along with the other significantly different changes in the Major update 2 & 3 amendment package for public consultation.
4.4.2 Tower base definition and associated amendments to Light rail urban renewal area overlay code

Based on the analysis provided, it is recommended references to ‘Tower base’ be changed to ‘Building base’ and that the definition be updated to expand the scope of the term to include the base of all buildings, rather than just ‘Towers’.

This removes reliance on the term ‘Tower’ and expands the term to be inclusive of ‘Building base’ forms that can contribute to good urban ground design outcomes in alignment with higher order architectural provisions.

Amending the terminology would offer the following benefits:

- Improved clarity for implementation;
- It would remove reliance on the term ‘Tower’;
- The term is inclusive of ‘Building base’ forms that can contribute to good urban ground design outcomes in alignment with higher order architectural provisions. This allows for provisions to encourage the desired ‘sense of enclosure’ at the street level (as per the Urban ground design outcomes described in the Strategic Framework and Overall outcomes) within the Primary focus and Secondary focus areas.
- It will allow for the Strategic framework provisions relating to maximum base heights and desired locations in the City to be more effective; and
- It would not undermine the policy intent of the Light rail urban renewal area overlay code.

5. Stakeholder consultation

The following stakeholders have been engaged in the preparation of this report:

<table>
<thead>
<tr>
<th>Name and/or Title of the Stakeholder Consulted</th>
<th>Directorate or Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lily Chan Acting City Architect</td>
<td>Economy, Planning &amp; Environment</td>
</tr>
<tr>
<td>Roger Sharpe Executive Coordinator Planning Assessment</td>
<td>Economy, Planning &amp; Environment</td>
</tr>
<tr>
<td>Steve Brett Executive Coordinator Major Assessment</td>
<td>Economy, Planning &amp; Environment</td>
</tr>
</tbody>
</table>

6. Action/Recommendation

It is recommended that the Major update 2 & 3 amendment package be changed as follows:

1. Revise references to ‘Tower’ in the High-rise accommodation design code, as shown in Appendix A.
2. Change the definition of ‘Tower base’ to ‘Building base’, as shown in Appendix B.
3. Make consequential changes in City Plan as a result of items 1 and 2 above, as shown in Appendices C, and D.
Appendix A: Proposed drafting amendments to the High-rise accommodation design code

**Tower**-Built form and design

**PO4**
Development provides for well-spaced towers buildings, which:
(a) allow for light penetration, air circulation and a reasonable level of residential amenity for occupants of the development and adjoining sites;
(b) are of a scale and form appropriate to the characteristics of the site; and
(c) use design elements to contribute to varied, interesting and visually attractive streetscapes.

**AO4.1**
Tower Building form (including balconies) along:
(a) single frontages and dual frontages where not on a corner, step in at least 3m from the tower building base; or
(b) corner frontages can have up to 1/3 tower building width extend straight down at the corner point to reinforce the intersection if negative ground level wind effects are mitigated.

**AO4.2**
New towers buildings are separated from any existing or approved towers buildings greater than 33m in height, adjacent or on-site, by a minimum distance of:
(a) 16m, where built form the proposed building is up to 55m in height; or
(b) 20m, where built form the proposed building is greater than 55m in height.

**AO4.3**
Tower form is Buildings are coordinated to off-set with adjacent existing and proposed towers buildings greater than 33m in height.

(Figures not shown – no changes to figures)

Figure 9.3.9-5
Illustration showing High-rise accommodation design outcomes where the tower building base facades reinforce the planned neighbourhood character and enhance the pedestrian experience with high quality architectural elements and windows

Figure 9.3.9-6
Illustration showing High-rise accommodation design outcomes where the tower building base form animates the street by engaging primary and secondary street frontages through the use of grand lobbies or other signature features
Appendix B: Proposed changes to administrative definition of ‘Tower base’

| Tower Building base | Tower Building base means a horizontally projecting the lower part of a tower building, between ground level and the point where the lower part is clearly distinguishable from the upper part of the building, having regard to elements such as, but not limited to, bulk and setbacks. Recreational areas located on top of the tower building base do not form part of the tower building base. A basement is not a building base. |

Building base

Building base
Appendix C: Consequential changes to Light rail urban renewal area overlay code as a result of proposed amendments outlined in Appendix B

Extracts of Light rail urban renewal area overlay code showing proposed amendments:

8.2.12.3 Purpose

(2) The purpose of the code will be achieved through the following overall outcomes:

Responsive

(e) Where incorporating a tower building base:
   (i) it does not exceed the tower building base height as identified on the Light rail urban renewal area overlay map;
   (ii) in the Primary focus area and the Secondary focus area, it is built to the street edge to provide a sense of enclosure at the lower levels;
   (iii) in the Secondary focus area, it is setback to the side and rear to allow for natural light penetration, natural ventilation around the building, maintenance access, adequate space for services and utilities and landscaping between buildings.
   (iv) in the Frame focus area and the Transition focus area, it is setback:
       A. from the street to allow for high quality landscaping (including deep planting and open space areas; and
       B. from the side and rear boundaries to allow for natural light penetration, natural ventilation around the building, adequate space for services and utilities and maintenance access.

(f) Tower Built forms in all focus areas:
   (i) achieves appropriate building separation in relation to its building height to allow for adequate access to natural light and natural ventilation;
   (ii) have provides tower separation between buildings, increasing with building height, to create an open skyline; and
   (iii) has a site cover floor plates which result in reduced width, bulk and scale to achieve compact building forms and slender towers that support tall slender towers; and
   (iv) does not have large floor plates.

Engaged

(k) Development provides an attractive, vibrant and varied public realm by:
   (i) promoting street activation at ground level and within the tower building base through creating opportunities for social interaction and public art;

(l) Design of car parking and servicing areas are reflective of the role and function of the area in which it is located, as outlined below:

Primary focus areas, Secondary focus areas and Frame areas

   (i) Car parking and servicing is located underground or only occurs above ground where it promotes street activation within the tower building base or is fully integrated into the built form with high quality layered and permeable facades so it is not visible from the street and adjoining sites.

Adaptable

(s) Development incorporates flexible design solutions within the tower building base, where including above ground car parking, to support adaptation and change throughout the life of the building.
Note: To facilitate the flexible re-use of the ground floor, Council recommends an internal floor to ceiling height of 4.5m. Above the ground floor, within the tower building base, Council recommends an internal floor to ceiling height of 3.5m.
### PART B – ASSESSABLE DEVELOPMENT BENCHMARKS

**Table 8.2.12-1: Light rail urban renewal area overlay code – for assessable development in the Light rail urban renewal area**

<table>
<thead>
<tr>
<th>Built form and scale</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PO2</strong> Development where involving a tower building base:</td>
<td></td>
</tr>
<tr>
<td>(a) incorporates modulation and articulation;</td>
<td></td>
</tr>
<tr>
<td>(b) defines the site through building form, expression, profile and materials;</td>
<td></td>
</tr>
<tr>
<td>(c) reinforces a sense of arrival and provides a clear and identifiable connection to the public realm; and</td>
<td></td>
</tr>
<tr>
<td>(d) positively contributes to the immediate streetscape and pedestrian environment with highly articulated building facades.</td>
<td></td>
</tr>
<tr>
<td><strong>AO2.1</strong> Modulation depth and width is not less than 25% of the tower base height</td>
<td></td>
</tr>
<tr>
<td><strong>AO2.2</strong> Development, in at least one instance, brings the form of the tower to the ground, combined with a significant ground plane space (i.e. the building entry court).</td>
<td></td>
</tr>
</tbody>
</table>

**Figure 8.2.12-1**
Example of a tower touching the ground

<table>
<thead>
<tr>
<th>Tower Building base</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PO3</strong> Where incorporating a building base, the tower building base does not exceed the maximum designated tower building base height specified in the Light rail urban renewal area overlay map.</td>
<td></td>
</tr>
<tr>
<td><strong>AO3</strong> No acceptable outcome provided.</td>
<td></td>
</tr>
<tr>
<td><strong>PO4</strong> Development provides a ground level and tower building base built form that addresses the street and creates interaction.</td>
<td></td>
</tr>
<tr>
<td><strong>AO4</strong> Development incorporates:</td>
<td></td>
</tr>
<tr>
<td>(a) direct entrance from the street at ground level; and</td>
<td></td>
</tr>
<tr>
<td>(b) a permeable façade.</td>
<td></td>
</tr>
</tbody>
</table>

**Figure 8.2.12-2**
Example of a development providing direct entrances from the street.
### Table 8.2.12-2: Additional provisions for assessable development in the Primary focus area and Secondary focus area

#### Tower Building base

**PO9**

Development where involving a **tower building** base is sited and designed in a manner, which:

(a) is built to the street edge to create a sense of enclosure; and

(b) has a site cover that allows modulation of the **tower building** base so that areas at ground level to be are open to the sky.

![Figure 8.2.12-5](image)

**Figure 8.2.12-5**

Example of a development with a **tower building** base that is open to the sky

Additional provisions that apply to Secondary focus area

(c) is setback to the side and rear to allow for:

(i) natural light penetration to the ground;

(ii) natural ventilation around the **tower building** base;

(iii) maintenance access, services and utilities

(iv) opportunities for:

A. horizontal and vertical landscaping; or

B. cross block links to facilitate pedestrian movement; or

C. activated edges at ground level.

#### Tower Built form

**PO10**

**Tower Building** form is sited and designed in a manner, which:

(a) is appropriately separated in relation to its height to achieve natural ventilation and allow light to penetrate into buildings;

(b) orientates and positively responds to the streetscape and adjoining buildings intended to remain in the Light rail urban renewal area (existing and approved);

(c) has a site cover that floor plates which result in reduced width, bulk and scale to achieve compact building forms and slender towers provides slender tower forms;

(d) has tower separation that promotes an open skyline; and

(e) avoids large floor plates by dividing a single building into multiple buildings.

**AO9.1**

In **Primary focus area**, development provides minimum front, side and rear building setbacks, maximum site cover and maximum floor plates in accordance with **Table 8.2.12-3: Setback, site cover and floor plate requirements – Primary focus areas**.

OR

**AO9.2**

In **Secondary focus area**, development provides minimum front, side and rear building setbacks, maximum site cover and maximum floor plates in accordance with **Table 8.2.12-4: Setback, site cover and floor plate requirements – Secondary focus areas**.

**AO10.1**

In **Primary focus area**, development provides minimum front, side and rear building setbacks, maximum site cover and maximum floor plates in accordance with **Table 8.2.12-3: Setback, site cover and floor plate requirements – Primary focus areas**.

OR

**AO10.2**

In **Secondary focus area**, development provides minimum front, side and rear building setbacks, maximum site cover and maximum floor plates in accordance with **Table 8.2.12-4: Setback, site cover and floor plate requirements – Secondary focus areas**.
Car parking

PO14
Car parking and servicing is located underground or only occurs above ground where:
(i) it promotes street activation within the tower building base; or
(ii) it is fully integrated into the built form with high quality layered and permeable facades so it is not visible from the street and adjoining sites.

Table 8.2.12: Additional provisions for assessable development in the Frame area and Transition area

Tower Building base

PO15
Development involving a tower building base is sited and designed in a manner, which:
(a) is setback from the street to allow for high quality landscaping (including deep planting);
(b) is setback to the side and rear to create a sense of spaciousness and allows for:
(i) natural light penetration to the ground;
(ii) natural ventilation around the tower building base; and
(iii) maintenance access, services and utilities.
(c) has a site cover that allows modulation of the tower building base so that areas, at ground level, to be open to the sky.

AO15.1
In Frame areas, development provides minimum front, side and rear building setbacks, maximum site cover and maximum floor plates in accordance with Table 8.2.12-6: Setback, site cover and floor plate requirements – Frame areas.
OR
AO15.2
In Transition areas, development provides minimum front, side and rear building setbacks, maximum site cover and maximum floor plates in accordance with Table 8.2.12-7: Setback, site cover and floor plate requirements – Transition areas.

Tower Built form

PO16
Tower Building form is sited and designed in a manner, which:
(a) is appropriately separated in relation to its height to achieve natural ventilation and allow light to penetrate into buildings;
(b) orintiates and positively responds to the streetscape and adjoining buildings intended to remain in the Light rail urban renewal area (existing and approved);
(c) has a site cover that floor plates which result in reduced width, bulk and scale to achieve compact building forms and slender towers provides slender tower forms;
(d) has tower separation that promotes an open skyline; and
(e) avoids large floor plates by dividing a single building into multiple buildings.

AO16.1
In Frame areas, development provides minimum front, side and rear building setbacks, maximum site cover and maximum floor plates in accordance with Table 8.2.12-6: Setback, site cover and floor plate requirements – Frame areas.
OR
AO16.2
In Transition areas, development provides minimum front, side and rear building setbacks, maximum site cover and maximum floor plates in accordance with Table 8.2.12-7: Setback, site cover and floor plate requirements – Transition areas.

Car Parking

PO20
Frame Area
Car parking and servicing is located underground or only occurs above ground where:
(i) it promotes street activation within the tower building base; or
(ii) is fully integrated into the built form with high quality layered and permeable facades so it is not visible from the street and adjoining sites.

AO20
No acceptable outcome provided.
Extract Table 8.2.12-3: Setback, site cover and floor plate requirements – Primary focus areas

<table>
<thead>
<tr>
<th>Development Category</th>
<th>Front setback (m)</th>
<th>Side Setback (m)</th>
<th>Rear Setback (m)</th>
<th>Site cover</th>
<th>Maximum floor plate</th>
<th>Setbacks between on site habitable buildings (where not attached)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tower Building base (up to 16m in height)</td>
<td>0m</td>
<td>0m</td>
<td>0m</td>
<td>90%</td>
<td>No provisions</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>

Extract Table 8.2.12-4: Setback, site cover and floor plate requirements – Secondary focus areas

<table>
<thead>
<tr>
<th>Development Category</th>
<th>Front setback (m)</th>
<th>Side Setback (m)</th>
<th>Rear Setback (m)</th>
<th>Site cover</th>
<th>Maximum floor plate</th>
<th>Setbacks between on site habitable buildings (where not attached)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tower Building base (up to 12m in height)</td>
<td>0m</td>
<td>3m</td>
<td>3m</td>
<td>80%</td>
<td>No provisions</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>

Extract Table 8.2.12-6: Setback, site cover and floor plate requirements – Frame areas

<table>
<thead>
<tr>
<th>Development Category</th>
<th>Front setback (m)</th>
<th>Side Setback (m)</th>
<th>Rear Setback (m)</th>
<th>Site cover</th>
<th>Maximum floor plate</th>
<th>Setbacks between on site habitable buildings (where not attached)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tower Building base (up to 8m in height)</td>
<td>4m</td>
<td>3m</td>
<td>3m</td>
<td>70%</td>
<td>No provisions</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>

Extract Table 8.2.12-7: Setback, site cover and floor plate requirements – Transition areas

<table>
<thead>
<tr>
<th>Development Category</th>
<th>Front setback (m)</th>
<th>Side Setback (m)</th>
<th>Rear Setback (m)</th>
<th>Site cover</th>
<th>Maximum floor plate</th>
<th>Setbacks between on site habitable buildings (where not attached)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tower Building base (up to 5m in height)</td>
<td>4m</td>
<td>4m</td>
<td>4m</td>
<td>60%</td>
<td>No provisions</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>

Light rail urban renewal area overlay map

Extracts of Light rail urban renewal area overlay map legend showing proposed amendments:

- Primary focus area (any tower building base has a maximum height of 16 metres)
- Secondary focus area (any tower building base has a maximum height of 12 metres)
- Frame focus area (any tower building base has a maximum height of 8 metres)
- Transition focus area (any tower or building base has a maximum height of 5 metres)
Appendix D: Consequential changes to other parts of City Plan as a result of proposed amendments outlined in Appendix B

Strategic Framework

3.4.2 Element – Architecture and urban design

3.4.2.1 Specific outcomes

Design principle 1 – Responsive

(7) Development in the Light rail urban renewal area as identified on the Light rail urban renewal area overlay map has a bulk, scale, form and intensity that is reflective of the role and function of the area in which it is located, as outlined below, and reinforces the planned character of that area.

Primary focus areas:

(b) Where incorporating a tower building base, the tower building base is built to the street edge to provide a sense of enclosure at the lower levels, and does not exceed the designated building base height as shown on with a maximum height in accordance with the Light rail urban renewal area overlay map.

Secondary focus areas:

(e) Where incorporating a tower building base, the tower building base is setback from the street relevant to its context, and does not exceed the designated building base height as shown on with a maximum height in accordance with the Light rail urban renewal area overlay map.

Frame areas:

(h) Where incorporating a tower building base, the tower building base is setback from the street to allow for high quality landscaping and open space areas, and does not exceed the designated building base height as shown on with a maximum height in accordance with the Light rail urban renewal area overlay map.

Transition areas:

(k) Where incorporating a tower building base, the tower building base is setback from the street to allow for high quality landscaping, open space areas and generous deep planting areas, and does not exceed the designated building base height as shown on with a maximum height in accordance with the Light rail urban renewal area overlay map.

(11) Development in the Neighbourhood element area as identified on the Neighbourhood element overlay map creates an attractive place to live by:

(c) not incorporating a tower building base; and …

Design principle 3 – Engaged

(20) Where incorporating a tower building base, not within the Light rail urban renewal area or the Neighbourhood element area, it is designed to ensure it:

Design principle 6 – Adaptable

(32) In the light rail urban renewal area:

(b) where including above ground car parking, development incorporates flexible design solutions within the tower building base, to support adaptation and change throughout the life of the building.
Zone Codes

6.2.18 Innovation zone code

PART B – ASSESSABLE DEVELOPMENT BENCHMARKS
Table 6.2.18-2: Innovation zone code – for assessable development

<table>
<thead>
<tr>
<th>Built form and scale</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PO6</strong></td>
</tr>
<tr>
<td>Site cover:</td>
</tr>
<tr>
<td>(a) assists in the protection of adjacent residential amenity;</td>
</tr>
<tr>
<td>(b) above the lower levels, contributes to the skyline character and maintains view points;</td>
</tr>
<tr>
<td>(c) allows for open space on the building base podium tops; and</td>
</tr>
<tr>
<td>(d) allows for areas of high quality landscaping and/or streetscaping treatments.</td>
</tr>
<tr>
<td><strong>AO6</strong></td>
</tr>
<tr>
<td>Site cover is up to 100% up to a height of 9.5m and up to 60% above 9.5m.</td>
</tr>
<tr>
<td>OR</td>
</tr>
<tr>
<td>Where adjoining a residential zone or open space zone site cover is up to 80% up to a height of 9.5m and 60% above 9.5m.</td>
</tr>
</tbody>
</table>

Note: The preparation of a Site context and urban design report in accordance with SC6.12 City Plan Policy – Site context and urban design is the Council’s preferred method of addressing this performance outcome.

6.2.20 Mixed use zone code

PART A – ACCEPTED DEVELOPMENT SUBJECT TO REQUIREMENTS
Table 6.2.20-1: Mixed use zone code – for accepted development subject to requirements

<table>
<thead>
<tr>
<th>Height</th>
<th>RO8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bermuda Point precinct</td>
<td></td>
</tr>
<tr>
<td>Building height and structure height does not exceed 45 metres with a tower building base up to 20 metres that reduces to 27 metres along the waterfront or 33 metres in the northwest portion of the site (land to the north of the boat ramp).</td>
<td></td>
</tr>
</tbody>
</table>

PART B – ASSESSABLE DEVELOPMENT BENCHMARKS
Table 6.2.20-2: Mixed use zone code – for assessable development

<table>
<thead>
<tr>
<th>Built form and scale</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PO8</strong></td>
</tr>
<tr>
<td>Building height and structure height does not exceed that shown on the Building height overlay map. AND</td>
</tr>
<tr>
<td>Bermuda Point precinct</td>
</tr>
<tr>
<td>Building height and structure height does not exceed 45 metres with a tower building base up to 20 metres that reduces to 27 metres along the waterfront or 33 metres in the northwest portion of the site (land to the north of the boat ramp).</td>
</tr>
<tr>
<td><strong>AO8</strong></td>
</tr>
<tr>
<td>No acceptable outcome provided.</td>
</tr>
</tbody>
</table>
Development codes

9.3.4 Commercial design code

9.3.4.2 Purpose

Note: To facilitate the flexible re-use of the ground floor, Council recommends an internal floor to ceiling height of 4.5m. Above the ground floor, within a tower building base, Council recommends an internal floor to ceiling height of 3.5m.
Appendix E: Definition of ‘Tower’ in other Cities

Melbourne - Tower means a building that exceeds the street wall, excluding an addition.

Sydney Development control plan (City of Sydney) - Tall buildings and towers are buildings greater than 35m in height.

New York City - A tower is a portion of a building that penetrates the sky exposure plane and is allowed only in specified high-density areas of the city. A tower may be occupied by residential, commercial or community facility uses.

Vancouver West end planning bylaw - For the purposes of considering setbacks, towers are defined as those floors of a building exceeding a height of 18.3 m (60 ft.).

City of Burlington (Canada): Tall buildings are defined as any building over 11-storeys. Components of a tall building are as follows:
- Building Base (Podium);
- Building Middle (Tower); and,
- Building Top.

Ottawa: - A high-rise building is defined as any building that is 10 storeys or more. A high-rise building has three primary components that are integrated into the whole of the design: a base or podium; a middle or tower, and a top.

Brisbane – The Brisbane City Planning Scheme (Brisbane City Plan) does not provide an administrative definition of Tower. However, the Brisbane City Centre neighbourhood plan code, sets various setback, site cover and height provisions which work together with diagrams to describe the part of the building considered to be a ‘tower’ within the City Centre. This includes a ‘tower site cover’ provision which generally indicates that the ‘tower’ relates to the setback storeys located above the street building. The diagrams illustrate ‘Towers and street buildings’ (Street buildings are effectively podiums and built to the street edge), and ‘Towers and plaza spaces in the River precinct’ (which are tower buildings with no podiums with public open space at the ground level).

These approaches are not directly transferrable to the amendment, as ‘tower bases’ describe the base of a building even if it is setback from the property boundaries, unlike ‘street building’. As such, ‘tower base’ describes a broader range of outcomes than what is considered to be a ‘street building’ under the Brisbane City Plan.