

23 July 2026

Brisbane City Council  
Chief Executive Officer  
GPO Box 1434  
BRISBANE QLD 4001

Via Email: [DSPlanningSupport@brisbane.qld.gov.au](mailto:DSPlanningSupport@brisbane.qld.gov.au)

ATTN: Diana Sun

Dear Diana,

RE: OTHER CHANGE APPLICATION & EXTENSION TO CURRENCY PERIOD UPON LAND AT 880 CREEK ROAD, CARINA (COUNCIL REFERENCE A006989681)

We write in relation to the abovementioned application and Council's Information Request dated 12 May 2026.

Pursuant to section 13.2 of the Development Assessment Rules under the Planning Act 2016, we provide the following response to Council's Information Request.

## 1. Noise

*The proposed development has not demonstrated that the Sales office will not impact the noise amenity of nearby sensitive uses. An adequate level of noise amenity, in accordance with PO1/AO1.1 and AO1.2 of the Centre or mixed use code, must be demonstrated as achievable.*

- a) *Submit further information demonstrating that the proposed use can comply with the hours of operation and screening requirements in AO1.1-AO1.2 of the Centre or mixed use code.*
- b) *Where a performance outcome is proposed, submit a Noise Impact Assessment Report prepared in accordance with the Noise Impact Assessment Planning Scheme Policy demonstrating compliance with PO1 of the Centre or mixed use code.*

In accordance with AO1.1 of the Centre or mixed use code, the Sales office does not intend to operate outside of 6am to 8pm. As such, hours of operation may be conditioned by Council accordingly for the proposed Sales office use to 6am to 8pm daily to ensure compliance with AO1.1. Similarly, any mechanical plant and equipment required for the Sales office will be acoustically screened in accordance with AO1.2 of the Centre or mixed use code.

## 2. Car parking spaces

*It is unclear from the submitted plans how many existing car parking spaces are located along the western side boundary within proposed Stage 1A, and clarification is also required as to whether the 22 car parking spaces proposed within Stage 1A are to be removed as part of Stage 5.*

*In addition, the number of car parking spaces within Stage 1B is inconsistent, with the submitted plans indicating 23 spaces, which differs from the submitted application material. Clarification is also required regarding the total number of car parking spaces within proposed Stage 2.*

- a) *Provide amended plans in accordance with PO14 of the Transport, access, parking and servicing code (TAPS) code that clearly identifies the car parking spaces within proposed Stage 1A, including clear dimensions for spaces located under the existing carport.*
- b) *Confirm whether the 22 car parking spaces proposed within Stage 1A are to be removed as part of Stage 5.*
- c) *Clarify the number of car parking spaces within Stage 1B.*

- d) Provide amended conditions that clearly reflect the intent of the application in relation to car parking across all affected subsequent stages.

The architectural plans have been updated to clearly reflect the number of existing car parking spaces on site. Upon review of the marked car parking spaces on site, there are 22 spaces adjoining the western site boundary, with an additional two (2) spaces proposed adjoining the proposed Sales Office building during the early stages of the development, including one (1) PWD space.

As a result, the staging results in the following car parking supply:

| Stage    | Use                                                                       | Net Car Parking Supply |
|----------|---------------------------------------------------------------------------|------------------------|
| Stage 1A | Sales Office                                                              | 24 spaces (inc. 1 PWD) |
| Stage 1B | Sales Office + internal driveways                                         | 45 spaces              |
| Stage 2A | Sales Office + Residential Care Facility                                  | 82 spaces              |
| Stage 2B | Sales Office + Residential Care Facility + Retirement Facility (27 ILUs)  | 116 spaces             |
| Stage 3  | Sales Office + Residential Care Facility + Retirement Facility (86 ILUs)  | 187 spaces             |
| Stage 4  | Sales Office + Residential Care Facility + Retirement Facility (140 ILUs) | 246 spaces             |
| Stage 5  | Residential Care Facility + Retirement Facility (201 ILUs)                | 277 spaces             |

The Sales Office will deliver an additional 22 spaces along the western boundary of the site consistently throughout the construction of the development until Stage 5 when the Sales Office and car parking will be removed to facilitate the final building of the development. In response to Item 4 of Council's Information Request, a clear access path will be constructed from the western car park to the Sales Office to provide access to the sales office. Further details regarding this access route is provided in response to Item 4 below.

To respond directly to Council's request, please see responses below:

- The proposed site plan prepared by *Deicke Richards* has been updated with clear dimensions and line marking for each car parking space within Stage 1A. Refer to drawing DA-012 Revision P2. In accordance with PO14 of the TAPS Code, the development for the Sales Office component provides more than 17 car parking spaces, being the minimum number of car parking spaces for a Sales Office in Table 14 of the TAPS PSP. Furthermore, car parking to the balance of the development is retained in accordance with Conditions 51, 112, 171, 232 and 300 of the approval, with a total of 277 spaces delivered as part of the final development.
- The 22 existing car parking spaces located along the western boundary will be removed with Stage 5 of the development, along with the Sales Office. These car parking spaces will no longer be required due to the removal of the Sales Office at this stage. Furthermore, the removal of the Sales Office and associated car parking is required with Stage 5 to enable the construction of the final stage.
- As part of the internal driveways, 23 new car parking spaces will be delivered as part of Stage 1B. This is in addition to the existing 22 car parking spaces along the western boundary of the site. As such, a total of 45 car parking spaces will be available on site upon completion of Stage 1B construction.
- The existing conditions of approval for Access, Grades, Manoeuvring, Carparks, Signs and Line Marking being Conditions 112, 171, 232 and 300 will remain unchanged as the same number of car parking spaces will be delivered during the relevant building construction. The suites of conditions

for each existing stage will need to be amended as submitted with the application material and copied for reference below.

| APPROVED CONDITIONS   | APPROVED RELATED STAGE | PROPOSED AMENDED STAGE |
|-----------------------|------------------------|------------------------|
| Conditions 1 to 72    | Stage 1 (Building 1)   | Stage 2 (Building 1)   |
| Conditions 73 to 131  | Stage 2 (Building 2)   | Stage 3 (Building 2)   |
| Conditions 132 to 190 | Stage 3 (Building 3)   | Stage 4 (Building 3)   |
| Conditions 191 to 251 | Stage 4 (Building 4)   | Stage 5 (Building 4)   |
| Conditions 252 to 321 | Stage 1 (Building 5)   | Stage 2 (Building 5)   |

Condition 51 will require amending to reflect the changed staging of the internal driveways being delivered as part of Stage 1B in lieu of Stage 2. The amended Condition 51 is provided below with words to be deleted are in ~~red and strikethrough~~, while new words are in **green and bold**.

| Condition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Timing                                                                                                                                                                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>51) Access, Grades, Manoeuvring, Carparks, Signs and Line Marking</b><br/>Provide access, parking and manoeuvring for vehicles on site in accordance with the relevant Brisbane Planning Scheme Codes, as indicated on the approved DRAWINGS AND DOCUMENTS, including the following:</p> <ul style="list-style-type: none"> <li>i. A pavement of minimum Local road standard or equivalent surface material (including associated drainage) to the area on which motor vehicles will be driven and/or parked.</li> <li>ii. Manoeuvring on site for a LRV, RCV and for the loading and unloading of vehicle(s).</li> <li>iii. Parking for <del>30 visitors/ 7 staff (23 visitor spaces at grade and 7 staff spaces in the basement) including 1 X spaces for PWD</del> and 27 X residents spaces <del>in basement</del> and for the loading and unloading of vehicle(s) within the site.</li> <li>iv. Provide secure bicycle parking as per the requirements of the Transport, access, parking and servicing planning scheme policy.</li> <li>v. A minimum of 2.3 metres height clearance to all undercover parking areas and a minimum of 2.5 metres above parking spaces for people with disabilities. The minimum clear height must be measured to the lowest protrusion from the ceiling (e.g. fire sprinklers, services, lighting fixtures, signs, etc).</li> <li>vi. A height clearance sign located at the entrance(s) to undercover car parking areas and a directional visitor parking sign clearly visible from the vehicle entrance to the site.</li> <li>vii. An appropriate area for the storage and collection of refuse, including recyclables, in a position which is accessible to service vehicles on the site.</li> <li>viii. The internal paved areas must be signed and delineated in accordance with the approved drawings and Manual of Uniform Traffic Control Devices - Queensland Department of Transport and Main Roads - Transport Operations (Road Use Management) Act 1995.</li> </ul> | <p>Prior to issue of Certificate of Classification / Final Inspection Certificate or prior to commencement of use, whichever comes first, and then to be maintained</p> |

|                                                                                                                                                                                                                                                                                                                                                                                            |              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| <p><b>51(a) Provide certification</b><br/>Submit to Development Assessment, certification from a Registered Professional Engineer Queensland, that the above requirements have been implemented in accordance with this condition.</p> <p>Timing: Prior to issue of Certificate of Classification/Final Inspection Certificate or prior to commencement of use, whichever comes first.</p> | As indicated |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|

A new condition will need to be imposed for Stage 1 and the car parking delivered as part of the Sales Office and internal driveways. As such, the new condition is proposed below:

| Condition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Timing                                                                                                                                                                                      |
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| <p><b>NEW CONDITION - STAGE 1</b><br/><b>Access, Grades, Manoeuvring, Carparks, Signs and Line Marking</b><br/>Provide access, parking and manoeuvring for vehicles on site in accordance with the relevant Brisbane Planning Scheme Codes, as indicated on the approved DRAWINGS AND DOCUMENTS, including the following:</p> <ul style="list-style-type: none"> <li>i. A pavement of minimum Local road standard or equivalent surface material (including associated drainage) to the area on which motor vehicles will be driven and/or parked.</li> <li>ii. Manoeuvring on site for a LRV, RCV and for the loading and unloading of vehicle(s).</li> <li>iii. Parking for 24 visitors relating to the Sales Office, 22 of which to be maintained until Stage 5 of the development. Additional parking for 23 visitors at grade, including 1 x spaces for PWD associated with Stage 1B and for the loading and unloading of vehicle(s) within the site.</li> <li>iv. Provide secure bicycle parking as per the requirements of the Transport, access, parking and servicing planning scheme policy.</li> <li>v. A minimum of 2.3 metres height clearance to all undercover parking areas and a minimum of 2.5 metres above parking spaces for people with disabilities. The minimum clear height must be measured to the lowest protrusion from the ceiling (e.g. fire sprinklers, services, lighting fixtures, signs, etc).</li> <li>vi. A height clearance sign located at the entrance(s) to undercover car parking areas and a directional visitor parking sign clearly visible from the vehicle entrance to the site.</li> <li>vii. An appropriate area for the storage and collection of refuse, including recyclables, in a position which is accessible to service vehicles on the site.</li> <li>viii. The internal paved areas must be signed and delineated in accordance with the approved drawings and Manual of Uniform Traffic Control Devices - Queensland Department of Transport and Main Roads - Transport Operations (Road Use Management) Act 1995.</li> </ul> <p><b>51(a) Provide certification</b><br/>Submit to Development Assessment, certification from a Registered Professional Engineer Queensland, that the above requirements have been implemented in accordance with this condition.</p> | <p>Prior to issue of Certificate of Classification / Final Inspection Certificate or prior to commencement of use, whichever comes first, and then to be maintained</p> <p>As indicated</p> |

The proposed development shows that the sales office will use the existing driveway to Bendena Terrace. However, Stage 1B proposes the construction of a new driveway and internal roadway. It is therefore unclear what the driveway arrangement will be.

- a) Provide additional information and amended plans showing the arrangement for use of the existing driveway and the proposed driveway in Stage 1B, including whether the existing driveway will be removed when Stage 1B commences construction, how the sales office will be accessed by the public during construction, and whether the existing driveway located close to the western boundary will be relied upon at any time or removed, in accordance with PO9 of the Transport, access, parking and servicing code (TAPS) code.

While there is vehicle access proposed directly to the Sales Office to ensure accessibility for all abilities, the majority of car park is provided via a separate crossover to the west of the Sales Office. As such, access will continue to be provided during the construction of the new crossover as part of Stage 1B.

The construction of the new crossover and internal driveway does not result in significant disturbance to the operation of the Sales Office, noting this will only limit access for a number of days. It is possible that the developer may choose to temporarily close the Sales Office for these days to avoid disruption. Notwithstanding, access can continue to be provided via the western car park during the construction of the internal driveway and new crossover. The western car park and driveway is not proposed to be removed until Stage 5 of the development.

The submitted plans indicate that the existing car parking spaces and the proposed sales office are separated by existing landscaping and topography (a sloped area). It is therefore unclear whether the public will be required to exit the site and use the public verge along Bendena Terrace to access the sales office.

- a) Provide additional information and amended plans demonstrating a feasible pedestrian access route to the sales office that does not require customers to use the public verge as part of the operation.

The existing car parking area has access down to the level of the Sales Office with an existing staircase adjoining one of the existing buildings on site. The architectural plans prepared by *Deicke Richards* have been updated to illustrate the existing staircase as shown in Figure 1 .

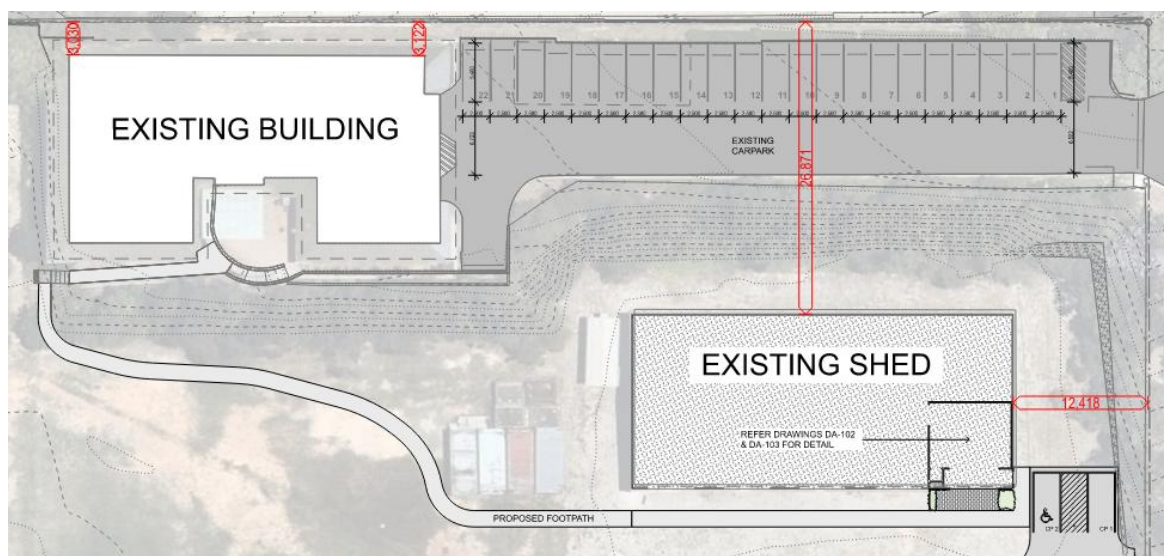


Figure 1: Proposed Sales Office and pedestrian connection with car parking area

A footpath is now proposed to be provided from the base of these stairs to the Sales Office until Stage 4 where the footpath will require removal to facilitate the Stage 4 construction. By Stage 4, it is anticipated that a display suite will be available in one of the constructed buildings, removing the need for the Sales Office. Notwithstanding, for the purposes of this development approval, the Sales Office is proposed to remain until physical removal is required to facilitate the construction of Stage 5 in the instance a separate Sales Office building is still required during construction and operation of Stage 4.

## 5. Pedestrian entry

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*The proposed development has not demonstrated that a prominent pedestrian entry, separated from vehicle access, is provided in accordance with PO20 of the Retirement and residential care facility code.*

- a) *Provide additional information and amended plans demonstrating that a prominent pedestrian entry, separated from vehicle access, is provided in accordance with PO20 of the Retirement and residential care facility code.*

The change to the development approval relates to a new Sales Office use and resulting staging changes only. While intended to be on site for longer than 2 years (thus not prescribed accepted development), the Sales Office is ultimately temporary in nature as it will be removed from the site when construction of Stage 5 commences. There are a number of reasons why no separate pedestrian entry to Bendena Terrace is proposed for the Sales Office stage of the development:

1. Due to the topographical variance between the site and Bendena Terrace, the works required to provide a separate pedestrian pathway are of the nature of permanent works rather than temporary works. It is noted that as part of the Stage 5 works, a permanent pedestrian entrance to the site will be provided from Bendena Terrace in accordance with the approved Landscape Concept Plan alongside the streetscape works required under Condition 213. This avoids unnecessary duplication and redundant works.
2. A separate pedestrian entry is provided along Creek Road with Stage 2B.
3. Visitors of the Sales Office are unlikely to be walking up the steep gradient of Bendena Terrace from Creek Road, considering the Sales Office is targeted towards the older population. It is anticipated most users of the Sales Office will be driving to the site.

To this end, a separate pedestrian entry is not proposed as part of the Sales Office stage. Alternatively, the pedestrian entry will be delivered with Stage 5 in accordance with the existing approval, allowing the pedestrian entry and associated streetscape works to be completed together supporting a coordinated construction process.

## 6. Landscaping

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*The proposed development has not demonstrated whether the existing landscaping along the western side boundary adjoining the existing car parking spaces, and along the northern frontage forming part of Stage 1A, will be retained in accordance with PO8 of the Retirement and residential care facility code.*

- a) *Provide additional information demonstrating that the on-site landscaping will be retained as part of the Stage 1A sales office in accordance with PO8 of the Retirement and residential care facility code.*

There is no intent to remove the vegetation on site until the time which removal is necessary to facilitate construction of the approved development. As such, it is anticipated that the vegetation located along the west and north frontages will be removed as part of Stage 4. Some of the vegetation will require removal to facilitate Stage 4, thus while the contractor is on site it is likely that the remaining vegetation will be removed at the same time to ensure an efficient construction programme.

## 7. Existing building

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*The proposed plans include another existing building, but its purpose and connection to the proposed development are unclear.*

- a) Provide details about the current use of this building, including its hours of operation and number of staff (if relevant), and explain how it relates to the proposed development. Additionally, clarify why this building should or should not be part of the application.
- b) If the operations within the existing building are deemed relevant to the proposed development, the building and its use must be included in the development application, which would require submitting an amended DA form 1.

The existing building on site, separate from the proposed Sales Office, is a vacant building remaining from the former Salvin Park Aged Care Facility. The building does not form part of this application or the proposed Sales Office use and is intended to be demolished as part of Stage 4.

Similar to the approach for removal of vegetation outlined above, the existing building is not proposed to be removed until Stage 4 to support construction program efficiency and contractor availability.

## 8. Bushfire

*The proposed use is required to achieve BAL 12.5 or lower under the current Bushfire overlay code (v35.2025). Buildings 2 and 3 are identified as a 'retirement facility', which, under Version 35 of the current Bushfire overlay code, is defined as an 'assembly use' and 'difficult to evacuate'. To determine whether the existing approval and its conditions remain consistent with the current laws and policies:*

- a) Provide an updated site-specific bushfire hazard assessment demonstrating that the proposed development can comply with the Bushfire overlay code.

In accordance with Section 82 of the *Planning Act 2016*, a change application for an Other Change is to be assessed against the assessment benchmarks and any matters the assessment must or may be carried out against under section 45(5)(a)(ii) or (b) "only to the extent the matters are relevant to assessing and deciding the change application in the context of the development approval". This part of the *Planning Act 2016* limits the assessment of the change application to the extent of the changes, rather than reassessing what has already been approved. As such, reassessment of the existing approved Buildings 2 and 3 forming part of the 'Retirement Facility' is not reasonable or relevant to the changes of this Other Change application.

On this basis, an assessment of the new Sales Office use only has been undertaken. As outlined within the Bushfire Response Letter prepared by *Litoria*, the proposed Sales Office building is wholly located outside of the modelled bushfire hazard areas. It is important to note that the previous modelled bushfire hazard areas remain applicable as the extent and configuration hazardous vegetation in and around the site remains unchanged.

We have now fully responded to Council Information Request in accordance with section 13.2 of the Development Assessment Rules under the *Planning Act 2016* and request that Council proceed with the assessment of the application.

To support this response to Council's Information Request, please find enclosed the following documents:

- Amended Architectural Plans prepared by *Deicke Richards*; and
- Bushfire Response Letter prepared by *Litoria*.

Should you wish to discuss the matter further, please do not hesitate to contact our office.

Yours faithfully

TOWN PLANNING ALLIANCE PTY LTD



Tara Nunn  
SENIOR PLANNER

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