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PLANNING & DEVELOPMENT

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APPLICATION REF
A006776357

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Via email: Errin.Lu@brisbane.qld.gov.au
DSPlanningSupport@brisbane.qld.gov.au

Dear Erin,

RE: RESPONSE TO INFORMATION REQUEST FOR A MATERIAL CHANGE OF USE FOR MATERIAL CHANGE OF USE FOR A SERVICE STATION UPON LAND AT 8 LONDON ROAD, BELMONT QLD 4151 LOT 110 ON RP208143

(COUNCIL REF: A006776357)

Reference is made to the abovementioned development application and the information request issued by Council dated 23 December 2025. The below provides a full response to all matters raised, and request that Council proceed with assessment of the application.

In support of this response, the following reports are provided:

- Attachment A – Stormwater management report
- Attachment B – Amended Traffic report
- Attachment C – Flood Impact assessment report
- Attachment D – Architectural plans

Land use and ancillary activities

1) Item 1 of the Information request has not been adequately addressed. It is acknowledged that the number of buildings has been reduced from three buildings to two buildings and total GFA has been slightly reduced from approx. 586.8m2 to 510m2. However, no floor plans were provided to clarify the internal layout of the proposed building, confirm the intended activities and ancillary uses within the building and clarify the extent of the service station and any ancillary use. Where the development involves uses and activities for a food and drink outlet or industry that is located in a separate building to the service station building and/or can be operated separately, it may still constitute a standalone use. Whilst the overall GFA has been reduced, the reduced GFA of 510m2 is still considered

to be of a size that will facilitate potential standalone uses that would not align with the intent, purpose and overall outcomes of the Environmental management zone, which is not supported.
a) Provide amended plans that significantly reduce the overall GFA and GFA of any proposed ancillary uses (such as food and drink outlet, shop and industry uses) and ensuring that the development is of a layout that does not constitute other standalone land uses that could be operated individually.
b) Provide floor plans showing detailed internal floor layout, including details of any ancillary uses proposed and clearly show the extent and GFA of each of the ancillary uses proposed. Ensure that the development is of a layout that does not constitute other standalone land uses that could be operated individually.
c) Provide further information demonstrating that any ancillary components are strictly ancillary to the service station use and will not be standalone and operated independently.

Response:

In response, the proposal has been further refined to ensure that all components of the development remain clearly subordinate and ancillary to the primary service station use. The proposed GFA of the proposed development has been further reduced for the overall development. It is important to note that GFA proposed is required in order to function and operate as a Service station.

The internal layout and building arrangement has been revised to ensure ancillary uses are physically and functionally integrated with the service station operation. The revised development layout consolidates activities into a single integrated service station operation and avoids the presentation or functionality of the use. The amended plans demonstrate that the ancillary components are minor in scale and directly support the needs of motorists and patrons utilising the primary service station use.

Detailed floor plans have now been provided as part of the amended proposal documentation. These plans identify the internal layout and function of each component within the building. The extent and GFA of each ancillary use area is detailed within the plans and all staff and operational areas are detailed.

The plans confirm that there is no tenancy separation, independent access arrangements, standalone servicing infrastructure, or operational configurations are proposed that would enable the ancillary uses to operate independently from the service station.

The ancillary uses are intentionally designed to remain subordinate in both scale and function to the primary service station use. The proposal does not include separate commercial tenancies. Given the preliminary nature of the land use application, there are no separate leasing arrangements or independent hours of operation for ancillary components. The ancillary components are wholly integrated into the overall operation of the service station and are intended to primarily serve customers already attending the site for fuel, convenience retail and associated traveller services.
Accordingly, the amended proposal maintains a clear primary use as a service station, with all supporting elements remaining subordinate and ancillary in nature.

Traffic

While an RPEQ endorsed report is provided and the development is providing parking numbers in accordance with TAPS, it is not considered that the provided design or supporting material are adequate to fully assess the proposed outcomes. The supplied plans and Traffic report have not addressed all of the issues raised in the information request, do not represent achievable or constructible outcomes and do not comply with Council standard requirements.

Submit an amended traffic report prepared in accordance with Section 1.3.2, Chapter 1 of the Infrastructure design planning scheme policy with corresponding plans and drawings prepared in accordance with section 1.5, Chapter 1 of the Infrastructure design planning scheme policy that address the following issues. Each of these issues should be directly addressed and clearly indicated in the report and drawings.

a) The plans contain multiple references to the site boundary, including one label appearing at the current kerb line and a plan showing kerb and channel located within the current property near the intersection with Cross Street. Correct all plan annotations to clearly and accurately reflect the true site boundary, verge and proposed kerb and channel.
b) Provide a concept traffic functional layout plan prepared in accordance with Section 1.9.7, Chapter 1 of the Infrastructure Design Planning Scheme Policy showing the required roadworks and drainage along London Road, including new kerb and channel and street gullies. The plan must also show the corner truncation required at the corner of Cross Street and London Road to accommodate AV access to London Road and note that the realigned kerb and channel around this corner will impact an existing table drain and gully.
c) The driveway layout does not demonstrate compliance with BSD-2021 standards as required under AO9.4 and AO11.1. Provide updated, dimensioned driveway plans designed in accordance with the relevant BSD drawings, including width, gradient, and verge treatment.
d) Swept path plans are not based on realistic approach or exit positions in the context of existing traffic lanes or street frontage (vehicle clearance areas not shown in accordance with TAPS). Despite statements that swept paths demonstrate access clear of vehicles parked opposite, multiple plans (including light vehicle paths) show encroachment into the marked shoulder beyond the traffic lane. Submit revised swept path analysis using realistic approach angles and sufficient clearance from kerbs and boundaries. Ensure the plans show both sides of London Road to demonstrate AVs can exit without impacting parked vehicles on the opposite side of the road.
e) Internal circulation areas appear excessively oversized, which could lead to issues with vehicle speeds and conflict points. While internal 3.5 m traffic lanes are referenced, aisles in excess of 10 m are shown which need to be reviewed and the layout rationalised.
f) TGSI are shown for the full width of the frontage verge at crossovers, which is inappropriate in this context. This needs to be revised to comply with accessibility and design standards.
g) Pedestrian access from the street frontage is indirect and conflicts with proposed landscape elements. Provide a compliant, direct pedestrian connection.

Response:

Please refer to the amended traffic report which has been prepared in response to the items raised. The amended traffic impact statement is accompanied with a set of revised architectural plans. All plan annotations have been corrected to clearly identify the true cadastral boundary, verge width, and the proposed kerb and channel locations. An amended Traffic Impact Assessment and corresponding engineering plans prepared by a suitably qualified RPEQ engineer are provided with this response package. The revised documentation directly addresses each matter raised in the Information Request as outlined below.

Erroneous annotations previously indicating site boundaries at the existing kerb alignment have been removed. The amended plans now clearly distinguish between the property boundary, verge area, road reserve and proposed civil works. The revised drawings also accurately identify the location of proposed kerb and channel works relative to the site boundary and existing infrastructure. A revised concept traffic functional layout plan has been prepared in accordance with Section 1.9.7 of Chapter 1 of the Infrastructure Design Planning Scheme Policy. The plans demonstrate that the frontage upgrade works can be achieved within the available road reserve and provide a coordinated and constructible civil design outcome.

A revised swept path assessment has also been undertaken using realistic vehicle approach and departure alignments that reflect actual traffic lane positioning and on-street operating conditions. The revised analysis demonstrates that vehicles can safely access and exit the site without unreasonable conflict with existing road users or parked vehicles.

The proposed TGSI layout has been revised to ensure compliance with accessibility and urban design standards. The amended plans remove inappropriate a full width TGSI treatments across the frontage verge at crossover locations and instead provide targeted compliant tactile treatments at required pedestrian crossing and interface points only.

The amended traffic engineering documentation, functional layout plans and civil drawings collectively address the matters raised within the Information Request and demonstrate that the proposed development can achieve a safe, functional and constructible transport and access outcome consistent with the applicable planning scheme and engineering design standards.

Stormwater and flooding

The submitted stormwater plans are poorly presented and key elements such as levels, easements, and infrastructure locations are unclear. Insufficient plans and information have been provided to allow Council to assess the development.
a) Provide clearly legible, scaled engineering stormwater plans that show the whole site, correct alignment of North, contours, flow paths, drainage structures, and easement boundaries. Plans should comply with IDPSP drawing standards and be capable of detailed assessment.

4) *The proposal lacks a clear assessment of overland flow across the site. Insufficient information has been provided to confirm the inundation extents, appropriate planning levels, or where easements should be located.*
a) Submit a flood study prepared by a suitably qualified RPEQ. The report must clearly identify flood extents, peak flood levels, velocities, hazard categories, and demonstrate how the development meets required planning levels and easement locations.

5) *Stormwater from a 3.5 ha upstream catchment southeast of London Road has not been addressed in the current drainage design.*
a) Design and include stormwater inlets on London Road and a pipe drainage system along the eastern boundary to intercept upstream flows. Include this infrastructure on updated engineering plans with demonstrated capacity.
6) *The proposed stormwater infrastructure is located along the western boundary, which is constrained by Matters of state environmental significance (MSES).*
a) Relocate proposed stormwater infrastructure to the eastern boundary where it aligns with the natural overland flow path and avoids MSES constraints. A pipes system is required all the way to the proposed lawful point of discharge. Updated plans and ecological constraints mapping must be submitted.
7) *A designated flow path along the eastern boundary is not shown in the documentation, despite the site clearly receiving upstream overland flow.*
a) Include a designated overland flow path corridor along the eastern boundary in the stormwater report and site layout. The corridor must be shown on plans, with levels and widths appropriate to the design event and incorporated into a drainage easement.
8) *It is acknowledged that the Atlan Spill-ceptor (previously known as a Puraceptor) is proposed in the written report by BANA Consulting Engineers (Rev 2 dated July 2025), however, it is not indicated on drawings.*
a) Provide one drainage plan which details the proposed location of the Atlan Spill-ceptor.
b) Ensure that the drainage plan clearly details the areas which are treated by the Atlan Spillceptor, which should be the whole fuel dispensing area and all the fuel delivery area (tanker unloading area).
c) Label the plans with the fuel delivery point where the tanker unloading occurs (it is currently not detailed enough in its actual location point on a drawing.
d) Submit the MUSIC modelling file which was used to prepare Figure 4 and Section 5.2 of the report by BANA Consulting Engineers Rev 2 dated July 2025.

Response:

Please refer to the amended stormwater management plan (Attachment A) and MUSIC model which addresses the items above.

Air Quality

9) The Air Quality Memorandum from Katestone dated 05/09/2025 Reference Number D25023-1 has been reviewed. The site at 11 London Rd, Belmont is in a sensitive zone (Rural residential zone) and is relevant under AO8 of the Service station code for distance separation. The fuel dispensing area (and potentially the tank-breathing vents located somewhere within this area) in the submitted plans, are within 50m of the boundary of 11 London Rd. Therefore, the development does not comply with AO8 of the Service station code based on the submitted plans. Further information is required to address AO8/PO8 of the Service station code.

a) Submit an Air Quality Report by a qualified air quality consultant where the distance separation is not achieved. Any reference to vapour recovery in reporting must be supported by labelling drawings with vapour recovery systems to complete all of the details on submitted plans.

The report must include emissions from the fuel dispensing area, tank-breathing vents and tanker unloading areas/fuel delivery areas.

Response:

It is acknowledged that 11 London Road is within the 50 metre separation zone from the indicative area of the fuel bowsers and fuel storage tank vents at the proposed service station. Notwithstanding this, the area of land on 11 London Road is already located within the 50 metre exclusion zone of the existing service station on the same lot. Accordingly, the dwelling was not included as a receptor requiring adequate separation from the proposed service station.

As the existing dwelling located at 11 London Road is within an existing exclusion zone and therefore, is not considered a sensitive receptor. Furthermore, the northern section of this lot is already located within the exclusion zone of the fuel bowsers and tank vents of the existing service station, meaning that approval of a sensitive land use (dwelling, etc) in this area is unlikely.

Noise

10) The noise report by ATP dated 19/9/25 Issue 1 Revision A has been reviewed. Further information is required to assess the development.
a) Provide further information clarifying the overall hours of operation for the fuel delivery tankers and any other heavy vehicles which may carry out deliveries.

Response:

At this preliminary stage of the proposal, a specific tenant has not been selected. Accordingly, the specific details of the operational hours of the fuel delivery tankers and other heavy vehicles have not been determined. The movement of heavy vehicles will be undertaken in accordance with the general operations of a Service Station.

Hazard & Risk - Hazardous Goods

11) The proposed use has the potential to store and/or use various quantities of hazardous goods. Such goods have the potential to impact on human health and the environment.

a) Submit further information detailing the Type, Quantity, Location, Class and Package Group of all existing/proposed dangerous goods. Where quantities exceed the AO3 of the Industry code, submit for approval a Hazard Analysis Report in accordance with PO3 of the Industry code and Industrial Hazard and Risk Assessment Planning Scheme Policy. The application must provide the levels of hazardous goods at this stage of the application. This information is required to assess the application and cannot be addressed via any potential conditions, if the application was to be supported (to clarify the situation further, the application cannot be determined without the information). To respond to this item, provide the number of underground tanks, and the quantity and type of fuel in

each tank. Ensure that the levels of bulk LPG (such as LPG in an above ground tank if this is relevant) are included in the response.

Response:

Similar to the movement of heavy vehicles, the specific tenant has not been selected for the site. From a high level perspective, the service station will incorporate the storage of underground tanks. Th general fuel types will consist of unleaded fuels and diesel which will be stored in 30,000-60,000 litre tanks. The total fuel storage will range between 80,000 litres to 250,000 litres.

Verge Width

12) The Cross Street/Belmont Road frontage and the London Road frontage are both mapped as Neighbourhood Street minor streets within the Streetscape hierarchy overlay code and are required to provide a minimum 3.75m wide verge. The submitted plans do not include sufficient information to clearly define the site boundary and the kerb, and it is unclear if both site frontages provide a minimum 3.75m wide verge width. There is also conflicting information shown on the plan, such as multiple and different references to the site boundary and kerb.
a) In accordance with PO1 of the Streetscape hierarchy overlay code and the Infrastructure design planning scheme policy (IDPSP), provide amended plans which illustrate:
i) The nominal face of kerb for the full length of the Cross Street/Belmont Road and London Road frontages of this lot to identify the existing verge width.
ii) Provide the necessary area as land dedication to achieve a 3.75m verge width for the full length of the Cross Street/Belmont Road and London Road frontages.
iii) Annotate the area to be provided as land dedication as 'new road - verge widening'.

Response:

Please refer to Attachment A which provides amended plans in accordance with the request above.

Significant Vegetation – Vegetation Retention

13) A review of aerial imagery and Council mapping shows that the whole site is overlaid with Natural Assets Local Law (NALL) – Significant Native Vegetation. It is likely that this site contains existing vegetation that may meet one or more of the six attributes of significant vegetation within the Vegetation planning scheme policy and may be retained and integrated into the proposed development as part of the onsite landscape works to respond to the landscape requirements of Service station code and the Landscape work code.
Identifying and documenting significant vegetation will require some reporting of what vegetation is present on a site and how this vegetation has been considered. The documentation should include a report and scaled mapping identifying all individual trees, and groups of vegetation that are located within the proposed development footprint of the site. Confirmation is also required that the other areas of existing vegetation on this lot are proposed to be retained

a) In accordance with the Vegetation planning scheme policy (VPSP), provide a survey of existing vegetation within the proposed development footprint by an AQF Level 5 qualified arborist. This survey of existing vegetation and supporting documentation is to clearly indicate:
b) Provide a revised development plan illustrating the retention of significant vegetation as defined by the VPSP within the development design and layout. This plan is to demonstrate that the development (including any proposed excavation or filling) avoids impacts on tree roots and canopies.
c) Where works are proposed within the TPZ of significant vegetation to be retained, provide a report from a qualified arborist (AQF level 5 Arboriculture) to demonstrate that the proposal will not adversely affect the long-term health of the trees.
Note: For further guidance on identifying and documenting this vegetation please refer to the Brisbane City Plan 2014 Vegetation planning scheme policy (Schedule SC6.33).
https://cityplan.brisbane.qld.gov.au/eplan/rules/0/276/0/0/0/218

Response:

At this preliminary stage of the application a tree survey has not been carried out. It is evident that the vegetation where located within the development footprint will be required to be removed. It is requested that this matter is conditioned given the fact that the NALL permit will require an assessment to be carried out at a later date.

Landscape concept plan

14) It is acknowledged that the submitted plans indicate landscape planting areas within the development, however, it does not include sufficient information to allow Council to assess the proposal against the provisions of the planning scheme including the Service station code, Landscape work code, Filling and excavation code.
Please refer to BCC's fact sheet on the preparation of Landscape Concept Plans for Council's minimum specifications and standards and amend the plans accordingly (https://www.brisbane.qld.gov.au/content/dam/brisbanecitycouncil/corpwebsite/building-andplanning/ documents/guide-to-preparing-a-landscape-concept-plan.pdf).
a) In accordance with the Service station code and Landscape work code, provide a landscape concept plan prepared by a suitably qualified and experienced landscape architect clearly illustrating:
i) The extent, function and character of areas to be landscaped, including existing and proposed surface levels and gradients, details of walls and fencing.
ii) Identification of any existing onsite trees to be retained as part of the development;
The proposed site landscape outcomes including the provision of a continuous 3m wide landscape strip containing groundcover and small shrubs along the frontage of the site.
iii) The proposed open-air car parking areas are designed and constructed to ensure that landscaping and shade trees thrive and achieve a minimum 50% shade cover within 5 years of planting.
iv) The landscape and line marking within the site provide a legible environment that can be safely and easily navigated by pedestrians and cyclists.
v) Any proposed earthworks, including batters, retaining walls and associated footings and drainage.

vi) An indicative planting plan or plant palette together with a detailed legend to demonstrate that planting design will address functional requirements.

Response:

Please refer to the revised architectural plans with illustrate landscaping treatments to the primary street frontage. It is requested that this matter be addressed by way of a condition of approval.

Survey Plan

15) The site boundaries do not appear to be accurately shown on the proposed plan. Details of any existing infrastructure along the frontage, details of the verge and location of the kerbs and channels have not been shown on the plans.
a) Provide survey plan of the subject site, prepared by a suitably qualified surveyor/professional.
b) Provide amended proposed plans based on the site boundaries and information provided in the survey plan.

Response:

Please refer to the revised architectural plans which provides additional details to address the items raised above. A survey is to be carried out at a later date during the detailed design phase of the project.

Sewer connection

16) The application provides limited detail regarding how the development can be adequately serviced in accordance with both Brisbane City Council and Urban Utilities' (UU) standards and requirements. The Information request response letter referenced a revised engineering report to address this matter, however, no revised engineering report was submitted. Provide a Service Action Notice (SAN) from UU to confirm the proposed development can be serviced by an acceptable sewer system in accordance with current standards

Response:

Please refer to the revised engineering report submitted in response to the item raised.

Conclusion

Thank you for your attention to this matter. We anticipate that this information is sufficient for your purposes and ask that you proceed with the assessment of this application. If you would like to discuss this proposal further, please feel free to contact me on 0439 810 832 or at david@blumeplanning.com.

Kind Regards,

David Zanker
Director - RPIA BURP
Blume Planning and Development Pty Ltd