

Our Ref: 25-241
6 May 2026

Chief Executive Officer
Brisbane City Council
GPO Box 1434
BRISBANE QLD 4000

Dear Mohammed,

RESPONSE TO INFORMATION REQUEST – A006826070
415 MILTON ROAD, AUCHENFLOWER QLD 4066

We refer to Council's Information Request dated 4 September 2025 and respond to the issues raised as follows.

1. Use

Council records indicate that an approval was granted on 8 February 1962 for Multiple Dwelling Class "A" within the dwelling component of a building consisting of both dwelling and surgery. Other than this, there is no record to show that this site had an approval for a business premises.

- (a) Clarify/provide further details or documentations to show that this site has an approval for a Business Premises, and this use is continuing to operate from this site.*
- (b) Please advise if the proposed ground floor extension will be used for any other purpose than those notated on the proposal plan.*

Response:

In response to the above item, we note the following:

- a) There are Council records for Building Works for a Doctor's Surgery in approximately 1997, and then further alterations to the premises in 1998.

At the time, the use of the site for a surgery, was defined as a Business Premises under the 1987 Planning Scheme. This would categorise the land use at the time, and presently, as a Business Premises.

- b) The undercroft area is not proposed for use and is not identified as Gross Floor Area.

Assessment Benchmark

The Small-scale non-residential uses code is an applicable code. This code has not been addressed and is required for assessment of this application. Please submit completed code for Council's assessment and where required, the design changes may be required.

Response:

A response to the Small-scale non-residential uses code is included as Attachment A.

2. Gross Floor Area

The proposed development has a gross floor area more than 250m².

- (a) *Reduce the gross floor area of the proposal to comply with Acceptable Outcome AO4 of the Small-scale non-residential uses code or demonstrate that the proposed development complies with Performance Outcome PO4 of the code*

Response:

The proposed development involves a small extension to the existing business premises. The use is expected to continue to serve the local community.

The proposal complies with PO4 of the Small-scale non-residential uses code by providing a use which is low key in scale, nature and employment in a building which has a history of non-residential use. Please also refer to the Economic Needs Assessment prepared by Urban Economics for additional information.

The existing premises includes a total Gross Floor Area (GFA) of 256.32m². The proposed extensions result in a total GFA of 325.71m², as such a total increase to GFA of 69.39m².

The proposed extensions include area for a lower level lobby, upper level lobby, meeting room, kitchen amenities and lunchroom. The proposed extensions are merely providing increased amenities and facilities for the existing use, including an accessible access location, rather than a direct increase in office space for more employees.

The proposed extensions do not provide undue impacts upon the streetscape and are reflective of non-residential uses along Munro Street such as 11, 15, and 17-17B Munro Street.

The extensions do not overlook into adjoining Dwelling Houses and are reflective of the commercial areas located on either side of Milton Road.

The extension of this non-residential use is not considered to adversely impact upon surrounding uses.

3. Side Boundary Setback

Amend the side boundary setback of the proposed extension to comply with Acceptable Outcome AO8.1 of the Small-scale non-residential uses code or demonstrate that the proposed development complies with Performance Outcome PO8 of the code.

Response:

Please refer to the Architectural Plans prepared by Petrie Architecture which includes an amended Site Plan to include the adjoining lot and Dwelling House. The revised plans also

include an additional Section Plan which highlights the slope of the sites and proximity of the extensions to the adjoining property.

The proposed extensions do not overlook or overshadow the residential dwelling as a result of the slope of the land and the existing landscaping.

The sloping topography ensures that the proposed extensions are located downhill from the adjoining Dwelling House, and as such will not cause a significant reduction in access to daylight or breezes.

Further, it is noted that the adjoining Dwelling House is located towards the southern end of the site, and the proposed extensions are located at the northern end of the site, so there is significant separation between the uses. The proposed extensions directly adjoin the driveway of the adjoining Dwelling House.

The proposed setback is considered suitable given the context of the existing use, the land uses in the area, and the slope of the land.

The building separation distances are identified in Figure 1 below.

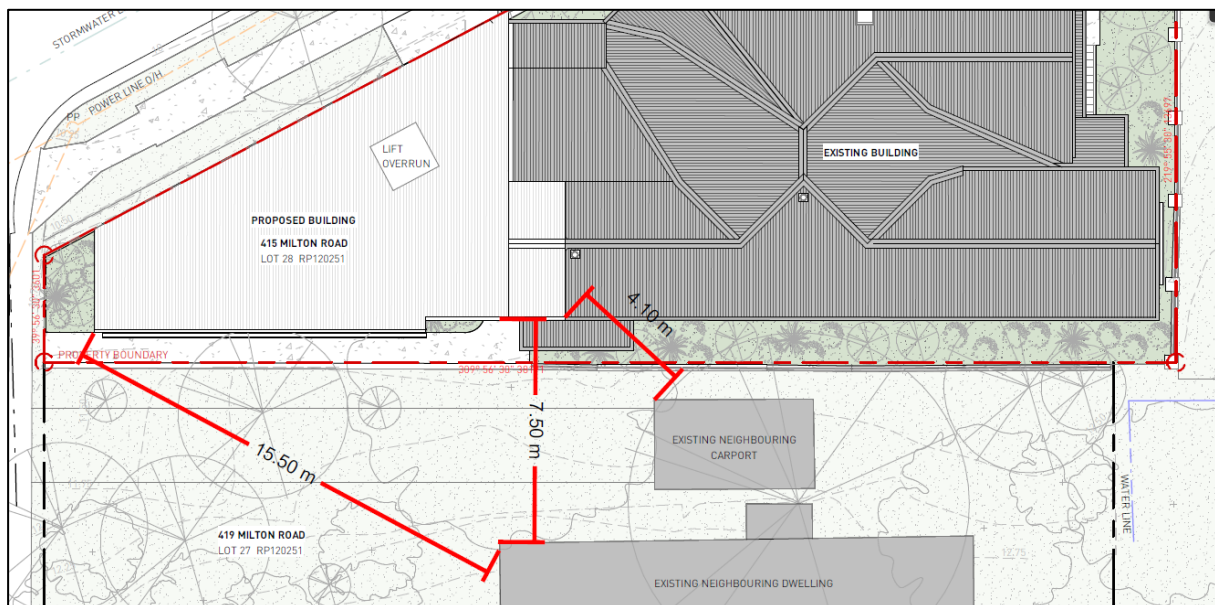


Figure 1 – Building separation distances

4. Landscape Buffer

Amend the proposal to provide a 2m landscape buffer along part of the western boundary of the site as per Acceptable Outcome AO12.3 of the Small-scale non-residential uses code or demonstrate that the proposed development complies with Performance Outcome P12 of the code in that the development provides landscaping that screens between the use and the adjoining residence to maintain privacy, enhance the appearance of the development and disguise undesirable features.

Response:

It is considered that the existing landscaping along the eastern boundary of 419 Milton Road is sufficient to provide attractive interfaces between the site and provide sufficient screening from the proposed extensions to the adjoining Dwelling House.

Provision of landscaping within the side setback of the subject site would provide little value in terms of screening, buffering and privacy for the adjoining dwelling due to the slope of the land.

It is noted that the top of the shared fence sits at approximately 2.5m above the ground level of the subject site. As such, it is likely that any landscaping proposed, would not be seen above the fenceline when viewed from the adjoining property. Please refer to the Sections Plans provided in the revised Architectural Plans.

The total landscaping across the site is considered to be appropriate for the nature of the use.

5. Services

Provide plans showing the location of the delivery of goods and storage and collection of rubbish bins that are in accordance with AO15.2 of the Small-scale non- residential uses code or demonstrate that the proposed development complies with Performance Outcome PO15 of the code.

Response:

The Traffic Impact Assessment provided by Ratio outlines that due to the scale of the use, the loading demands for the tenancy would be infrequent. As such, it was determined that the day to day demands for loading generated can be supported by a van.

Additionally, the servicing and loading arrangements for the proposed commercial use are to be generally consistent with the operation of the existing land use and site. Based on the size of the original Medical Centre, it is anticipated that the intensity of the loading activity would have been low.

Vans are able to utilise the vacant on-street parking site or can access the site temporarily to deliver goods and services, whilst being located at a distance greater than 5m from an adjoining sensitive use. Refuse collection is to continue to occur as existing.

6. Demolition

The subject site contains a pre-1946 dwelling house and partial demolition will be required for the proposed extension. The submitted proposal plans do not include existing and partial demolition drawings to make any assessment against the Traditional Building Character (demolition) Overlay Code. Proposed elevations indicate all existing windows are boarded over and all detailing removed that raises concerns with compliance with the demolition code.

- (a) Provide existing drawings including existing site plan, floor plans and elevations showing any proposed partial demolition for Council's assessment as this information has not been provided and required for the assessment of this application.

Response:

Please refer to the revised Architectural Plans prepared by Petrie Architects.

7. Flooding

It is noted the new extension is designed to match the floor levels of the pre-1947 building on both levels. Whilst the ground level use under the new addition has been labelled as 'storeroom' (drawing 3 of 8), however the elevations show extensive glass window treatment indicating that this area could suit the current Office use. Council has concerns that the excavated area under the new addition could be impacted by stormwater runoff that converges within the sag point in Munro Street and fails to comply with the Flood overlay code.

- (a) *Provide advice from a suitably qualified RPEQ to establish the height of perimeter wall required to prevent stormwater ingress, in accordance with the Flood overlay code.*

Note: The ground level layout may need to be re-designed.

Response:

Please refer to the Flood Report provided by Pitch Black Group and the Revised Overland Flow Assessment prepared by Water Technology.

This letter represents a full response to Council's Information Request in accordance with the Development Assessment Rules and the end of the applicant's response period.

We note that the Public Notification period will commence shortly.

Should you require any further clarification or additional information please do not hesitate in contacting the undersigned.

**Yours faithfully,
Plan A Town Planning Pty Ltd**



**Georgina McNee
Senior Town Planner**

ATTACHMENTS

- A. Small-Scale Non-Residential Code Response
- B. Revised Architectural Plans
- C. Flood & Overland Flow Assessment
- D. Economic Need Report

ATTACHMENT A – SMALL-SCALE NON-RESIDENTIAL USES CODE ASSESSMENT

Performance outcomes	Acceptable outcomes	Comments
<p>PO1 Development:</p> <ul style="list-style-type: none"> a. is in a highly accessible location; b. is not located on local or neighbourhood roads where it will adversely impact on local amenity and safety; c. does not contribute to strip development along arterial roads; d. must not introduce non-local traffic into a minor road. 	<p>AO1 Development is on a site that:</p> <ul style="list-style-type: none"> a. is located on either a district road or a suburban road; b. does not have a boundary to an arterial road. 	<p>PO1 Complies The subject site is bounded by Neighbourhood Roads on two sides, and an Arterial Road on one side. The site is in a highly accessible location, and is sited amongst other non-residential uses. The site has historically been occupied by non-residential uses. The proposed expansion of the Business Premises is not considered to result in undue impacts on the locality and residential amenity, with the site having a history of a non-residential use with high customer / vehicle turnover (medical centre).</p>
<p>PO2 Development must not:</p> <ul style="list-style-type: none"> a. create a de facto centre through clustering of small-scale non-residential uses; b. cause incremental extension to the edge of an existing centre through sequential development of multiple small-scale non-residential uses; c. be located in a catchment that is already serviced by an existing centre. 	<p>AO2.1 Development is not located on a site that:</p> <ul style="list-style-type: none"> a. adjoins a zone in the centre zones category; b. is in close proximity to an existing or approved small-scale non-residential activity group use; c. adjoins a site in the Commercial character building overlay or the Active frontages in residential zones overlay. <p>AO2.2 Development does not isolate residential properties between non-residential uses.</p>	<p>PO2 Complies Refer to the Economic Needs Assessment prepared by Urban Economics.</p>
<p>PO3 Development is complementary and appropriate to the applicable zone in the residential zones category, Emerging community zone or the Rural residential zone.</p>	<p>AO3 Development does not involve the sale of items that are restricted to customers over 18 years of age, other than cigarettes, alcohol and lottery/scratch-it type tickets.</p>	<p>AO3 Complies The proposal does not involve the sale of items that are restricted to customers over 18 years of age.</p>
<p>PO4 Development must be low key in scale, nature and employment, and of an appropriate size to</p>	<p>AO4 Development has a maximum gross floor area of 250m².</p>	<p>PO4 Performance Outcome The existing use has a GFA of more than 250m². The proposal includes an overall increase to the</p>

<p>serve the needs of the local residential community.</p>		<p>GFA of approximately 69m². The additional areas proposed are for ancillary spaces (i.e. lobby, meeting room and lunch room). These proposed extensions do not inherently increase the scale of the use, merely just providing increased facilities and amenities.</p> <p>The extensions also allow for the provision of a lift to increase accessibility to the site.</p> <p>Please Refer to the Economic Needs Assessment prepared by Urban Economics.</p>
<p>PO5 Development ensures that building bulk and size, including any extensions and alterations to an existing building, complements the character and density of adjoining residential dwellings and the surrounding streetscape.</p>	<p>A05 Development has a maximum building height of 2 storeys and 9.5m.</p>	<p>A05 Complies The building will maintain a maximum of two (2) storeys in height.</p>
<p>PO6 Development ensures that building form is varied and building bulk reduced by design elements such as verandahs, awnings, recesses and projections, and a range of materials, colours and textures.</p>	<p>A06 No acceptable outcome is prescribed.</p>	<p>PO6 Complies The proposed built form is highly articulated, with varying materials, planters, verandahs and screening.</p>
<p>PO7 Development has a front setback that complements the building setbacks prevailing in the street.</p>	<p>A07 No acceptable outcome is prescribed.</p>	<p>PO7 Complies There is no change to the front setback to Milton Road.</p> <p>The proposed front setback (to Munro Street) is a continuation of the existing setback.</p> <p>The setback to Rossmere Lane, of approximately 2m, is considered to be appropriate giving the building separation, provision of landscaping and the narrow frontage of that part of the lot.</p>
<p>PO8 Development must not significantly reduce daylight to open space and habitable rooms in adjoining premises.</p>	<p>A08.1 Development has a side boundary setback of a minimum: a. 0m for a wall built to the side boundary;</p>	<p>PO8 Complies The proposed side boundary setback is 1m. This setback is considered appropriate given the sloping topography of the site and</p>

	<p>b. 1.5m for a wall up to 4.5m high; c. 2m for a wall up to 7.5m high; d. 2m plus 0.5m for every 3m (or part of 3m) over 7.5m for a wall over 7.5m high; e. less than 1.5m where the wall is no more than 3.5m high and no more than 15m long.</p> <p>AO8.2 Development has a minimum rear boundary setback of 6m.</p>	<p>the location of the dwelling on the adjoining site.</p> <p>The adjoining dwelling (419 Milton Road) is located at the southern end of the site away from the proposed extensions, with a total separation distance of approximately 7.5m.</p> <p>Further, the additional section plans included in the architectural plans show the slope of the land and the existing mature vegetation which is to be retained.</p> <p>We do not consider that this minor reduction to the side setback will impact on amenity of the adjoining dwelling house.</p> <p>It is noted that the subject site does not have a rear boundary.</p>
<p>PO9 Development provides boundary walls that are limited in dimensions and openings, to minimise impacts on adjoining premises.</p>	<p>AO9 For development with a wall built to a side boundary, the wall has:</p> <p>a. a maximum height of 3m, unless it abuts a higher existing or simultaneously constructed wall; b. a maximum length of 15m where it does not abut an existing boundary wall.</p> <p>Note—Where a wall built to the boundary has a height less than 2m measured on the adjacent property, it can extend the full length of the boundary, excluding any front or rear boundary setback.</p>	<p>AO9 Not Applicable The proposed development does not include a wall built to a side boundary.</p>
<p>PO10 Development ensures the location, height, extent and materials of fencing and retaining walls must be designed to:</p> <p>a. minimise visual impact; b. assist surveillance of street frontages, accessways and pedestrian entry to the premises.</p>	<p>AO10.1 Development provides front fences with visual interest that allow for surveillance of the street and are:</p> <p>a. articulated with gates, indentations and have transparent detailing; b. not constructed of solid materials.</p> <p>AO10.2 Development ensures that the combined height of any retaining</p>	<p>AO10.1-AO10.2 The proposal does not include front fencing or retaining walls and fencing exceeding a height of 2m.</p>

	wall and fence does not exceed 2m.	
	AO10.3 Development provides retaining walls that are set back from any boundary and stepped or terraced to allow landscaping to soften the appearance.	
PO11 Development ensures that light nuisance is minimised.	AO11 Development ensures that the design, installation, operation and maintenance of outdoor lighting complies with the requirements of AS 4282-1997 Control of the obtrusive effects of outdoor lighting.	AO11 Can Comply The proposed development can be conditioned to comply with the relevant requirements for provision of any new lighting on site.
PO12 Development provides landscaping that: a. retains existing vegetation, including street trees; b. is consistent with the established landscape character of the applicable zone in the residential zones category; c. provides an attractive and legible interface between the use, the streetscape, and adjoining residential uses; d. screens between the use and adjoining residences to maintain privacy, enhance the appearance of the development, and disguise undesirable features such as outdoor storage areas or service bays.	AO12.1 Development ensures that site design enables the retention of established trees where removal is not required to locate new buildings, car parks or driveways.	AO12.1 Not Applicable The area of the site proposed for the extensions is not currently landscaped. AO12.2 Complies The proposed design includes areas of in-ground landscaping, planters and vertical gardens to buffer, soften the built form and create a sense of arrival to the building.
	AO12.2 Development ensures landscape design emphasises a clear pedestrian entry point for staff, customers and visitors, and allows overlooking of the street and pedestrian entry areas.	
	AO12.3 Development provides landscaped buffers a minimum of 2m wide along site boundaries adjoining residential uses.	PO12 Complies The subject site adjoins a residential premises (419 Milton Road). However, it is noted that the dwelling house itself is located in excess of 7m from the proposed extensions. The existing Site Plan shows the extent of existing landscaping on site and the slope of the land. It is considered that landscaping along this boundary will be of little benefit to amenity of the adjoining residence, with the subject site located much lower than the dwelling.
PO13	AO13.1 Development provides only one vehicle access way to the site.	AO13.1 Complies The proposal includes the retention of the single point of vehicle access.

<p>Development provides vehicular access ways that are designed and located to:</p> <ul style="list-style-type: none"> a. minimise on-site and off-site safety conflicts between pedestrians and vehicles; b. ensure efficient vehicular or pedestrian ingress to or egress from the premises; c. reduce the visual impact on the streetscape. 	<p>AO13.2 Development ensures that the location of the access way maintains the integrity, quality and primacy of footpaths.</p>	<p>AO13.2 Complies The proposed development includes provision of an accessible access location with the inclusion of a lift.</p>
<p>PO14 Development provides adequate on-site car parking, servicing and delivery bays that ensure that employee, customer and visitor parking associated with the use does not:</p> <ul style="list-style-type: none"> a. dominate the frontage of the premises; b. cause on-street traffic congestion and parking delays; c. create traffic circulation hazards on the adjoining street; d. cause adverse impact on residential amenity. <p>Note—On-site parking and servicing areas are provided for staff, customers and visitors in accordance with the Transport, access, parking and servicing planning scheme policy.</p>	<p>AO14 Development provides car parking that is:</p> <ul style="list-style-type: none"> a. designed to provide sufficient car parking spaces on site to minimise on-street parking demand; b. provided below or at the rear of the building; c. not located within the front setback; d. screened from adjoining residential uses by a 2m high acoustic fence. 	<p>PO14 Complies The proposed development does not include any additional car parking spaces. The existing car park is considered sufficient to accommodate the proposed extensions. Please refer to the Traffic Report previously provided to Council.</p>
<p>PO15 Development protects the amenity of the neighbourhood, the public realm and adjacent sensitive uses.</p>	<p>AO15.1 Development provides for any air conditioning, refrigeration and other mechanical plant, vents, exhausts and refuse and recycling storage areas to be:</p> <ul style="list-style-type: none"> a. located so that they are not visually obtrusive when viewed from the street; b. screened to minimise visual impacts on an adjoining sensitive use. <p>Note—Refer to the Refuse planning scheme policy for further guidance.</p> <p>AO15.2 Development provides areas for the delivery of goods and storage and collection of rubbish bins that are:</p>	<p>AO15.1 Complies Any new plan equipment will be suitably located.</p> <p>PO15 Complies The proposed design includes a screened bin store area at the north-western end of the site. The</p>

	<ul style="list-style-type: none"> a. fully enclosed within a building; or b. where associated with a detached building and externally located, are greater than 5m from an adjoining sensitive use; or c. where associated with a multiple dwelling, located in accordance with the Multiple dwelling code. 	<p>bin store area is located in excess of 15m from the adjoining dwelling. Impacts on residential amenity are not anticipated.</p>
<p>PO16 Development ensures that the hours of operation including for deliveries, the use of indoor activity areas and private open space, are controlled so that the use does not impact on the amenity of residences within the building within which the use is located, and nearby sensitive uses.</p>	<p>AO16 Development ensures that the hours of operation including for deliveries, the use of indoor activity areas and private open space, are limited to between 6am and 8pm.</p>	<p>AO16 Complies Hours of operation are proposed between 6am and 8pm.</p>
<p>PO17 Development is of a nature and scale which does not result in noise emissions that exceed the following criteria: L_{Aeq,adj,T} emitted from the small-scale non-residential use is not greater than the rating background level plus 3 at a sensitive use. Where T is: <ul style="list-style-type: none"> • Day (7am to 6pm): 11hr; • Evening (6pm to 10pm): 4hr; • Night (10pm to 7am): 9hr. Where L_{Aeq,adj,T} is the A-weighted equivalent continuous sound pressure level during measurement time T, adjusted for tonal and impulsive noise characteristics, determined in accordance with the methodology described in the Noise impact assessment planning scheme policy. Note—Rating background level is to be determined in accordance with the methodology described in the Noise impact assessment planning scheme policy. Note—A noise management report prepared in accordance with the Noise</p>	<p>AO17 Development: <ul style="list-style-type: none"> a. is conducted wholly within an enclosed building and does not involve outdoor activities; b. ensures mechanical plant or equipment is acoustically screened from adjoining sensitive uses. Note—Mechanical plant includes generators, motors, compressors and pumps such as air conditioning, refrigerator or coldroom motors.</p>	<p>AO17 Complies The proposed development does not include outdoor activities. Any additional mechanical equipment will be suitably screened.</p>

<p>impact assessment planning scheme policy can assist in demonstrating achievement of this performance outcome.</p>		
<p>PO18 Development ensures that direct overlooking from the small-scale non-residential use to adjoining residential dwellings is minimised by building layout, location and design of windows and balconies or screening devices.</p>	<p>AO18 Development ensures that where windows, balconies, verandahs, terraces and/or decks have a direct view into windows of habitable rooms in an adjoining residential dwelling, that view is screened by:</p> <ul style="list-style-type: none"> a. fixed opaque glazing; b. fixed external screens; c. fencing but only if overlooking from windows at ground level. 	<p>AO18 Not Applicable The slope of the land restricts any views from the proposed extensions towards the existing adjoining dwelling.</p>
<p>PO19 Development must create a safe environment by incorporating the key elements of crime prevention through environmental design.</p>	<p>AO19 Development incorporates the key elements of crime prevention through environmental design in its layout, building or structure design and landscaping by:</p> <ul style="list-style-type: none"> a. facilitating casual surveillance opportunities and including good sightlines to publicly accessible areas such as car parks, pathways, public toilets and communal areas; b. defining different uses and private and public ownership through design and restricting access from non-residential uses into private residential dwellings; c. promoting safety and minimising opportunities for graffiti and vandalism through exterior building design and orientation of buildings and use of active frontages; d. ensuring publicly accessible areas such as car parks, pathways, public toilets and 	<p>AO19 Complies The proposed development utilises a frontage which can be viewed from a major arterial road and uses windows that promote casual surveillance sightlines for publicly accessible areas.</p>

	<p>communal areas are well lit;</p> <p>e. including way-finding cues;</p> <p>f. minimising predictable routes and entrapment locations near public spaces such as car parks, public toilets, ATMs and communal areas.</p> <p>Note—For guidance in achieving the key elements of crime prevention through environmental design, refer to the Crime prevention through environmental design planning scheme policy.</p>	
If for veterinary service		
<p>PO20 Development prevents adverse noise impacts on adjoining residential premises and other sensitive uses, by limiting the use of a premises for veterinary service to:</p> <p>a. day-clinic functions only;</p> <p>b. a stand-alone, detached building.</p>	<p>AO20.1 Development does not involve overnight accommodation of animals.</p> <p>AO20.2 Development is not located within a multiple dwelling.</p>	<p>PO20 Not Applicable The proposed development does not include a vet service.</p>