



*Dedicated to a better Brisbane*

02 February 2026

Council Approval Group  
Po Box 7228  
LEURA NSW 2780

**ATTENTION: Rebecca Gesch**

**Application Reference:** A006908306  
**Address of Site:** 487 ELLISON RD ASPLEY QLD 4034

Dear Rebecca

**RE:** Information request in accordance with the Development Assessment Rules

Council has carried out an initial review of the above application and has identified that further information is required to fully assess the proposal.

Under the current City Plan provisions, Health care service is not an anticipated use and does not satisfy the outcomes sought for the Low density residential zone. It is acknowledged the site has been used for health care services since the 1970's and therefore has historical use rights. However, this development application proposes a Health care service use (occupational therapist) in a proposed modular building, which increases the overall total use area to 473m<sup>2</sup>. The increase in GFA ensures the area of the proposed use is greater than the maximum 250m<sup>2</sup> required in the Low density residential zone to be considered a small scale use.

Overall, the proposed development and land use has not been sufficiently demonstrated to meet a number of key benchmarks under the Brisbane City Plan 2014, specifically but not limited to:

- Aspley district neighbourhood plan code, Overall outcome 3.a.
- Low density residential zone code, Overall outcomes 4.g and 4.i (i, ii and iii)
- Small-scale non-residential uses code, Overall outcomes 2.a, 2.b, 2.d, 2.e and 2.f and Performance outcomes PO1, PO2 and PO4.

Considering the above, should you choose to pursue this development application, it will be necessary to successfully resolve the matters outlined within this letter. It is anticipated that substantial costs may be accrued in responding to these matters and it must be noted that Council cannot guarantee support for the proposal.

The proposal is subject to Impact assessment and pursuant to the Planning Act 2016, public notification is required to be completed. Council will have regard to any submissions received in completing its assessment of the application.

**Land use**

- 1) Noting the site's proximity to an existing district centre and the potential implications for land use alignment, the proposal seeks to establish a centre activity on residential land which is not zoned for centre use. It is also important to note that, as per the overall outcome in the Low density residential zone (4.i), development for a compatible and individual small-scale non-residential use which is a community care centre, community use, health care service,

office, shop or veterinary service (together with any associated caretaker's accommodation or dwelling unit), where not on land within the Commercial character building overlay is to:

- i. have a gross floor area of less than 250m<sup>2</sup>;
  - ii. serve local residents' day-to-day needs;
  - iii. not undermine the viability of a nearby centre.
- a) Provide further information demonstrating that the proposal continues to honour the historical use rights granted to the development in accordance with the abovementioned provisions. Justifications should be made on whether the development, given there is already an established land use by virtue of the historical use rights, is able to achieve the maximum GFA requirement of 250sqm to be considered as a compliant small-scale non-residential use in the zone, or is able to sufficiently justify that the proposal continues to service the local needs of residents and does not compromise the existing centre.

### **Flooding - Flood immunity / Elevated Building Level**

2) It is acknowledged a flood report has been provided; however, the proposal does not satisfy PO5/PO9 of the Flood overlay code. The development is surrounded by high-hazard flood conditions, yet the building floor level is not elevated sufficiently to enable a safe *shelter-in-place* response.

The plans do not reflect the required 2.5m elevation above existing ground level, nor do they show a compliant undercroft design or safe flood-immune access.

- a) Provide amended architectural plans in accordance with Flood overlay code that show:
- i) The building raised to a level enabling safe refuge during flooding, being no less than 2.5m above existing ground level, as required where evacuation is not possible in high-hazard flood conditions.
  - ii) Any proposed undercroft parking designed to comply with 2% AEP (Category C) flood immunity, including structural supports, clearances, and level transitions.
  - iii) Correct finished floor levels and all level differences between ground and building.
  - iv) Revised access arrangements (ramps, stairs, accessible paths) that accurately reflect required level changes.
- b) Provide an updated assessment addressing Flood overlay code PO9 that:
- i) Demonstrates the proposed building floor level provides a safe shelter-in-place outcome where evacuation is not feasible.
  - ii) Identifies how the elevated structure avoids exposure to the surrounding high-hazard flood environment.
  - iii) Confirms compliance with PO9 requirements for safe operation, access, and usability during design flood conditions.

### **Parking Flood Immunity**

3) The architectural plans provide general parking layout, but no assessment has been provided demonstrating compliance with PO5 of the Flood overlay code. Existing ground-level parking is subject to high-hazard flooding up to 800mm deep, which is not trafficable and unacceptable given the intensification of use, permanent staff, vulnerable occupants and visitors with disabilities. No evidence has been provided that parking can achieve the required 2% AEP (Category C) flood immunity.

- a) Provide amended plans in accordance with Flood overlay code PO5 that show:
- i) Parking areas elevated or filled to achieve Category C flood immunity (2% AEP) in accordance with Table 8.2.11.3.L.
  - ii) All fill extents, structural elements, level changes, and drainage adjustments necessary to achieve safe, usable parking during design flood events.
  - iii) Revised layouts showing that parking and circulation areas remain safe and trafficable for staff, patients, and persons with disabilities.
- b) Provide an updated flood impact assessment as required by Flood overlay code PO5/PO9 that:

- i) Confirms the proposed fill or elevated parking will not cause adverse impacts (flood level rises, velocity increases, obstruction of flow paths) on adjoining properties.
- ii) Demonstrates negligible impact on the broader floodplain.
- iii) Shows the proposal meets PO5/PO9 requirements for maintaining or improving existing flood behaviour and property safety.

### **Concept Earthworks Plan**

- 4) If the flooding immunity changes demand filling on the site, a concept earthworks plan will be required to be submitted to support this application. This plan will assist in highlighting any potential issues and ensure a thorough assessment has been carried out prior to approval.
  - a) Provide a concept earthworks plan for the development showing any proposed retaining walls and drawings with the existing and proposed levels. Describe any retaining/shoring methods to be employed during construction and identify the extent of any cut or fill being proposed.

### **Traffic Impact Assessment**

- 5) Compliance with the Transport, access, parking and servicing code has not been adequately demonstrated in the submitted plans and supporting material.
  - a) Provide a Traffic Impact Assessment Report, prepared and certified by a Registered Professional Engineer Queensland (RPEQ), that demonstrates compliance with the Transport, access, parking and servicing code.
  - b) Demonstrate site access design standards will comply with SC6.31 Transport, access, parking and servicing (TAPS) Planning scheme policy (PSP)
  - c) Access on Ellison Road must be restricted to left-in and left-out only. A non-trunk extension of the pedestrian median is required as physical enforcement to prevent unlawful turns.
  - d) Access must comply with *TAPS PSP* and accommodate two-way traffic in and out of the subject site, with a 6.5 m width for service vehicles such as ambulances.
  - e) Demonstrate that the 20 car parks currently provided will cater for peak demand of the existing GFA and the additional proposed GFA.
  - f) Dedicated bays for service vehicles and PWD (People with Disabilities), as well as a shared area, must be provided.
  - g) For healthcare services with 200 m<sup>2</sup> or greater GFA, the requirement is:
    - i) 14 spaces plus 5 spaces per 100 m<sup>2</sup> GFA.

#### **Note:**

*Any performance solutions proposed for consideration must be documented within the RPEQ-signed Traffic Impact Assessment Report.*

*The report must:*

- identify the specific AO(s) or TAPS PSP provisions that cannot be met,*
- provide justification for non-compliance,*
- outline alternative solutions considered, and*
- demonstrate how the proposed performance solution achieves the intent of the Transport, access, parking and servicing code and associated planning scheme policies.*

### **Road Dedication – Corner Truncations**

- 6) All road corner truncations are required to be a minimum 6m long by 3 equal chord truncations to be in accordance with the requirements set out in PO6 of the Road Hierarchy Overlay Code and the Infrastructure Design Planning Scheme Policy.
  - a) Amend the plans to provide a 6.0m by three chord corner truncation at the corner of Ellison Road and Eustace Street in accordance with PO6 of the Road Hierarchy Overlay Code.

### **Refuse**

- 7) It is noted that no refuse storage area has been shown on the proposed plans.
  - a) In accordance with PO5/AO5 of the Community facilities code and PO8/AO8.1, AO8.2 of the Infrastructure design code, demonstrate on amended plans a refuse storage area that

is either within a building or a roofed and screened enclosure, that has a minimum internal area of 3.6m<sup>2</sup> (3m x 1.2m).

- b) State the dimensions of the refuse storage area on the amended plans.

*Note: If the intent is to utilise an existing storage area, the existing storage area must be demonstrated on amended plans and be roofed and screened.*

- 8) A 'Health Care Service' has the potential to produce clinical and related waste which is classified as regulated waste. Correct storage and handling of the regulated waste must be demonstrated. A refuse storage area for regulated waste has not been demonstrated.
- a) In accordance with Part 12 of the Waste Reduction and Recycling Regulation 2023 and PO5/AO5 of the Community facilities code, demonstrate on amended plans a secure storage area for regulated waste.
- b) Clearly label the regulated waste storage area on the amended plans.

*Note: Whilst the proposed business (Occupational Therapist) may not produce regulated waste, the applied use is for Health Care Service and therefore any Health Care Service can utilise the premises and has the ability to produce regulated waste.*

- 9) No information regarding refuse collection has been provided. It is noted the proposed development can accommodate on-site servicing by a Refuse Collection Vehicle (RCV).
- a) In accordance with PO1/AO1 and PO19/AO19.3 of the Transport, access, parking and servicing code demonstrate on site servicing can be achieved by a RCV as specified in Table 3 of the Refuse Planning Scheme Policy.

*Note: Council core services include general refuse, commingled recycling and green waste. To support sustainable development and landfill diversion, Council encourages the use of its green waste service. If the development is proposing to utilise the green waste service from Council, amend the proposal plans to demonstrate sufficient storage and kerbside presentation area for the required number of 240L green waste mobile garbage bins. Refer to <https://www.brisbane.qld.gov.au/content/dam/brisbanecitycouncil/corpwebsite/about-council/documents...>*

### **Landscape Concept Plan (LCP)**

- 10) A landscape concept plan not been provided, therefore, it is not possible to undertake a comprehensive landscape assessment. A well-resolved landscape concept plan will likely result in the conditioning of works for private certification.
- a) Provide a landscape concept plan. Please refer to Council's website for our requirements: <https://www.brisbane.qld.gov.au/planning-building/planning-guidelines-tools/brisbane-city-plan-2014/fact-sheets/guide-preparing-landscape-concept-plan>
- i. Provide screening to aircon units (either landscaping or screens)

### **Noise**

- 11) It is not clear from the submitted information whether or not the development will comply with AO2.1 of the Community facilities code which includes no amplified music, indoor activities only, 2m high acoustic fence, and acoustic screening of mechanical plant and equipment. Please be advised that these will be conditioned.

### **Spray Painting**

- 12) PO4/AO4 of the Community facilities code has not been addressed satisfactorily. The development is considered a sensitive use and it is therefore requested that it is confirmed whether there are any spray painting facilities within 150m of the development site. If there is a spray painting facility within 150m of the site an air quality report is to be submitted demonstrating compliance with air quality criteria in PO4.

## **Urban Utilities (UU)**

Council does not undertake water and sewer assessment of any planning applications. Contact UU on (07) 3432 2200 to discuss any water and sewer issues and whether you are required to submit an application to UU for assessment.

## **Responding to this request**

Your response should include a summary table which outlines any changes to performance outcomes and plans that have resulted from addressing the issues outlined above. The table should also include details of any supporting documentation.

If a response is not provided within the prescribed response period of three (3) months assessment of the application will continue from the day after the day on which the response period would have otherwise ended.

Email your response to [DSPlanningSupport@brisbane.qld.gov.au](mailto:DSPlanningSupport@brisbane.qld.gov.au) quoting the application reference number A006908306.

Please phone me on telephone number below during normal business hours if you have any queries regarding this matter.

Yours sincerely



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