



**City Planning and Economic Development Services
Development Services**

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24 September 2026

Roycorp Pty Ltd
C/- Town Planning Alliance Pty Ltd
PO BOX 7657
EAST BRISBANE QLD 4169

ATTENTION: Brendan Ferris

Application Reference: A007086542
Address of Site: 141 FURSDEN RD CARINA QLD 4152

Dear Brendan

RE: Information request in accordance with the Development Assessment Rules

Council has carried out an initial review of the above application and has identified concerns with the proposed development, particularly in relation to the inclusion of a residential component for Multiple Dwelling on community facilities zoned land and the flood constraints associated with the site. Council has identified that further information is required to fully assess and consider the proposed development.

Land Use

- 1) The proposal would result in the permanent loss of a substantial area of land within the Community facilities zone to accommodate a 72-unit Multiple dwelling development. The application does not adequately demonstrate that this represents an appropriate land use outcome having regard to the Community facilities zone code, Community facilities code, and Strategic framework of *Brisbane City Plan 2014*.

The Community facilities zone is intended to accommodate community-related uses, activities and facilities and to ensure land within the zone remains available to meet community needs. The zone code specifically seeks to ensure that development does not prejudice the establishment of new community facilities appropriate to the relevant precinct. This aligns with PO12/AO12 of the Community facilities code, Overall Outcomes 4.a to j. and 5.j. of the Community facilities zone code, Overall Outcomes 2.d, 2.f and 2.h. of the Community facilities code, the purpose of the Community facilities zone code, and Theme 2: Brisbane's outstanding lifestyle and Element 2.4 - Brisbane's community facilities, services, open space and recreation infrastructure and Theme 5: Brisbane's CityShape, Element 5.5 - Brisbane's Suburban Living Areas of the Strategic framework.

The proposed Multiple dwelling component would substantially constrain the site from a future community facility use. While the provision of housing, including build-to-rent, may provide a community benefit, the current proposal does not demonstrate that these benefits outweigh the permanent loss of a finite supply of Community facilities zoned land, particularly where housing can be accommodated within areas specifically intended for residential development. Accordingly:

- a) Amend the proposal to remove the Childcare centre and include another community use which is not identified as a 'difficult to evacuate use' in accordance with Schedule 1 of the *Brisbane City Plan 2014*.

- b) Amend the proposal to retain the site for community facility purposes and demonstrate how any reduced residential component can be integrated without prejudicing the site's purpose for community facilities.
- c) Provide further justification demonstrating how the proposed Multiple dwelling development achieves the applicable overall outcomes of the Community facilities zone code, Community facilities code, and Strategic framework, despite permanently reducing the land available for present and future community facility purposes.
- d) Demonstrate that there is sufficient community and economic need for the proposed residential development to justify the permanent loss of Community facilities zoned land, including why the identified housing need cannot reasonably be accommodated on land designated for residential development. Refer to the below items outlined in relation to the Need Assessment to assist in addressing this requested information.
- e) Provide further information demonstrating the nature, extent and long-term security of the build-to-rent multiple dwellings and how this achieves a relevant community benefit.
- f) Demonstrate how the scale, form and intensity of the proposed Multiple dwelling development is compatible with the intended function of the Community facilities zone and will provide compensatory community benefits sufficient to offset the loss of land otherwise protected for community facility purposes.

Need Assessment

- 2) The report includes an analysis of various housing indicators, including building approvals, house prices, rents and rental vacancy rates, however benchmarks this to Greater Brisbane. Benchmarking the study area to the Brisbane Local Government Area (LGA) would be a more appropriate benchmark.
 - a) Amend the assessment to include an analysis of the various housing indicators benchmarked to the Brisbane LGA.
- 3) Whilst indicating a demand for additional residential housing within the study area, the assessment has not provided an analysis of development approvals for new housing yet to be constructed nor an analysis of the remaining capacity of the planning scheme. In the absence of such investigations, it cannot be determined whether there is a need for the residential component of the proposed development.
 - a) Provide an amended Need Assessment including an analysis of the quantum of approved dwellings (based on development approvals) yet to be constructed and an analysis of the remaining capacity of the planning scheme to accommodate increased residential densities across the residential zones and relevant parts of Centre zones. This should be compared with the projected future demand for housing.
- 4) Vacant Community facilities zoned land in Brisbane is relatively limited and difficult to find. The Community facilities zone code seeks the protection and continuation of uses identified within the particular Community facilities zone precinct (for this site - Health care purpose zone precinct). This position is reflected in the City Plan's Strategic Framework, which states in relation to land allocated for community facilities, the land is only to be used for another purpose where it can be shown that the use has relocated or is absolutely no longer required by the Brisbane community (3.4.5.1 SO2 L2.2 (b)). Further, 3.4.5.1 SO2 L2.5 states, development of non-community facilities and services on the site are complementary and ancillary to the community facilities and services and do not compromise the ability or capacity of the facilities and services to be delivered or operate.

The proposed Multiple dwelling does not accord with the intended Health care purpose zone precinct and does not seek the establishment of an alternative Community facility use or offer compensatory community benefits. The proposal would result in the reduction of available land for Community facility uses and restricts the future use of the site to serve the community and provide a community benefit.

- a) Provide an amended assessment addressing Brisbane's long-term need for community facility uses, demonstrating the planning scheme has capacity to meet that need and there is an absence of need to retain the subject site for its zoned purpose.

Flood Immunity

- 5) Fursden Road is impacted by high hazard flooding, and the application has not demonstrated that safe, flood-free access to and from the site can be maintained during a flood event. This is of particular concern for the proposed Childcare centre, which is a vulnerable use reliant on parents and guardians accessing the site for the collection of children. The submitted flood risk assessment does not adequately demonstrate compliance with PO3 of the Flood overlay code, including the relevant flood risk assessment requirements of Chapters 9.3 and 9.4 of the Flood Planning Scheme Policy (PSP).

Further, having regard to PO10 and PO11 of the Flood overlay code, the site is affected by creek flooding, which typically provides insufficient warning time to safely implement evacuation or emergency management measures. The application also does not demonstrate flood-free access for the Multiple dwelling component in accordance with PO11.

The potential for Fursden Road to become unsafe or impassable during a flood event raises concerns regarding evacuation, emergency response, and the potential for persons to attempt to traverse hazardous floodwaters to access children remaining at the site.

Accordingly, the application does not adequately demonstrate achievement of Overall Outcomes 2.a. to 2.d. and 2.k. of the Flood overlay code, Overall Outcome 2.a. of the Childcare centre code, Overall Outcome 2.f.i. of the Community facilities code, and Overall Outcomes 4.i.i., 5.f. and 5.i. of the Community facilities zone code. Accordingly:

- a) Amend the development to provide a more-suitable Community facility land use.
- b) Submit a revised flood risk assessment addressing the requirements of Chapters 9.3 and 9.4 of the Flood planning scheme policy for both the revised proposal. The assessment is to demonstrate whether the identified flood risks, including access, evacuation, emergency response, warning time, and isolation, can be appropriately managed and clearly identify the measures necessary to achieve an acceptable flood risk outcome.

Earthworks

- 6) The proposed earthworks plans grade the internal cul-de-sacs against grade of the stormwater system. Moreover, compliance with the Filling and excavation code has not been demonstrated.
 - a) Provide a preliminary concept earthworks plan showing the proposed extent of cutting and filling to comply with PO1/AO1 and PO2/AO2.1-AO2.3 of the Filling and excavation code and PO37/AO37.1 of the Multiple dwelling code.
 - b) Submit both layout plans and preliminary longitudinal sections to demonstrate that the proposed filling and grading can ensure that all stormwater will be discharged to the pipe system at the front of the site.

In addition to the significant issues raised above which result in the proposal not being supported, the following additional technical matters are also raised:

Childcare Centre

Stormwater Quality

- 7) The site is high-risk from a stormwater quality perspective as it is greater than 2,500m² as per Section B of the Stormwater code. However, compliance with PO16/AO16 and PO17 of the Stormwater code has not been demonstrated. Accordingly:
- a) Submit an operational phase Site Based Stormwater Quality Management Plan in accordance with Section 7.9.3 “Permanent Methods of Water Quality Control” of the Infrastructure design PSP. The plan is to include pollutant export modelling using MUSIC ($\geq$ Vers 6). The plan must also contain specific details of the location, size, maintenance, and operation of all proposed stormwater quality improvement devices. Furthermore, site plans must be presented that demonstrate all run-off will be directed to these proposed devices before discharge off-site.
 - b) Submit a digital copy of the MUSIC modelling file to support the proposed stormwater quality management plan.

Deep Planting

- 8) The landscape plans show a deep planting area on the eastern side boundary of the 1,470m² childcare portion of the site. The landscape plans have not clearly defined the extent of proposed deep planting area (in m²) to be provided for the development, noting that areas of synthetic turf are not to be included within deep planting area calculations. The plans also indicate that only two large subtropical trees are proposed within the deep planting area. PO4/AO4.3 of the Childcare centre code anticipates the provision of trees with a minimum height of 4m and a 3m spread at the time of planting that can grow to a minimum canopy diameter of 8m and a minimum height of 15m within 5 years of planting. In accordance with PO4/AO4.1-4.3 and PO6/AO6 of the Childcare centre code and PO7/AO7 and PO8/AO8.1-8.2 of the Landscape work code, submit amended plans that incorporate the following:
- a) A minimum of 10% or 147m² of the childcare centre site to be provided for deep planting with areas that provide a minimum dimension of 4m in any direction.
 - b) Large subtropical tree species that at maturity are complementary in scale and height to the building form and capable of growing to a minimum canopy diameter of 8m and a minimum height of 15m within 5 years of planting.
 - c) Details of the large subtropical tree species and stock sizes to be provided to ensure trees have a minimum height of 4m and a 3m spread at the time of planting.

Containerised Planters

- 9) The proposal plans show areas of containerised planting for the Childcare centre without detail regarding proposed soil volumes and depths of planting types within these areas. Specifically, the submitted architectural plans show a planter located on the eastern edge of the first floor and the landscape plans show proposed on-podium areas for feature planting adjoining the first floor play area. To demonstrate that the containerised planting or on-podium planters will provide suitable species selection and soil volumes and dimensions in accordance with PO6/AO6 of the Childcare centre code, PO4/AO4.1-4.3, PO12/AO12.1-12.4, and PO13/AO13.1-13.8 of the Landscape work code, and the Landscape design PSP, submit amended plans that provide:
- a) Containerised or on-podium planters with soil volumes and dimensions in accordance with the Landscape design PSP for the selected plant types.
 - b) Details of the proposed planting species to be provided within all containerised or on-podium planters.
 - c) Information and demonstration of how safe and effective landscape maintenance can be undertaken for all containerised or on-podium planters.

Multiple Dwelling

Communal Open Space

- 10) The submitted plans do not clearly define the areas of proposed communal open space (COS) for the Multiple dwelling portion of the development to achieve AO30.1 of the Multiple dwelling code. Moreover, the primary 339.2m² COS area is not located centrally within the site to provide an equitable level of access for future residents. In accordance with PO8/AO8 and PO30/AO30.1 of the Multiple dwelling code, provide revised plans that demonstrate:
- a) The location and extent of all proposed COS areas that provide a minimum 5% or 605m² of the Multiple dwelling site area.
 - b) The relocation of the primary COS (pool, BBQ area, and grass open space) to be centrally located within the Multiple dwelling component of the site.
 - c) COS areas are landscaped to provide a pleasant outlook for users and offer both passive and active recreation opportunities for future residents.
 - d) COS areas provide opportunities for a range of uses and flexible use by future residents.

Private Open Space

- 11) The proposal plans show areas of private open space (POS) in the form ground level landscape areas and either a ground level patio or above ground level terrace. The assessment report indicates that all proposed ground level dwellings are provided with a minimum total of 35m² of POS at ground level or a combination of areas at and above ground level. However, the submitted plans do not identify the areas (m²) or dimensions of POS areas for each dwelling within the development. Further, the proposed 2-storey townhouses include 6-7m² ground level patio areas that are not functional considering the possible number of residents in each dwelling. In accordance with PO8/AO8 and PO31/AO31.1 of the Multiple dwelling code, submit revised plans that:
- a) Provide a minimum total of 35m² of usable and unobstructed POS for each dwelling, with spaces that provide a minimum of 3m in any direction to demonstrate functionality.
 - b) Provide a minimum 12m² ground level patio or above ground level terrace for each dwelling that provides a minimum 3m in any direction to demonstrate functionality.
 - c) Identify the total POS area (m²) provided for each dwelling and the dimensions and area (m²) for either a ground level patio or above ground level terrace.

Refuse Management

- 12) While the three (3) proposed residential refuse enclosures appear to be of sufficient size, no dimensions of the enclosures have been shown. Moreover, kerb and channel, landscaping and a speed bump affect the transfer path of bins from the refuse enclosure adjacent to Townhouse 43. In accordance with PO32/AO32 of the Multiple dwelling code and with PO8/AO8.1-8.2 of the Infrastructure design code:
- a) Denote the dimensions of the refuse enclosures on the amended plans. Each refuse enclosure to have minimum internal dimensions of 5.4m by 2.3m (12.42m²). Ensure that the height of the enclosures is a minimum of 2.1m.
 - b) Ensure that the amended plans state "Roofed and Screened Bin Washdown and Storage Area 5.4m by 2.3m (12.42m²)".
 - c) Ensure that the transfer path for the bins from the refuse enclosure adjacent to townhouse 43 to the Refuse Collection Vehicle (RCV) loading area is free and clear and there are no steps, lips, or obstructions (i.e. kerb and channel, speed bumps, turf, landscaping, or the like).
 - d) Amend the proposal plans to demonstrate sufficient storage and kerbside presentation area for the required number of 240L green waste mobile garbage bins, if the development is proposing to utilise the green waste service from Council.

Awnings

- 13) The proposed building design of the Multiple dwellings does not accommodate subtropical elements such as window hoods, deep recesses or eaves to all external doors and windows on the north and west facing building facades.
- a) Provide amended plans showing elements such as window hoods, deep recesses or eaves to all external doors and windows on the north and west facing building facades on amended plans in accordance with AO26.2 / PO26 of the Multiple dwelling code.

Transport access parking and servicing

- 14) The proposal plans do not demonstrate the provision of compliant car parking for persons with a disability. To comply with PO13/AO13 and PO15/AO15 of the Transport, access, parking and servicing code:
- a) Provide bollards at the entrances to the shared zones attached to the persons with a disability car parking spaces on amended plans.

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 quoting the application reference number A007086542.

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

Yours sincerely



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