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APPLICATION REF
A007111419

23 October 2026

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

Via Email: DSPlanningSupport@brisbane.qld.gov.au

ATTN: Katarina Segovic

Dear Katarina,

RE: PARTIAL DEMOLITION & RELOCATION OF LOCAL HERITAGE PLACE AND OFFICE UPON LAND AT 96 BOUNDARY STREET, WEST END (COUNCIL REFERENCE A007111419)

We write in relation to the abovementioned application and Council's Information Request dated 14 October 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. Heritage

Council has reviewed the Heritage Impact Assessment provided with the development application and has determined that further information is required to demonstrate compliance with PO1, PO2, PO3 and PO4 of the Heritage overlay code.

a) Provide additional external and internal photography of the heritage place in its entirety to understand the existing context of the heritage plane and its overall physical condition to show the level of intervention within the existing spaces versus their construction date;
b) To assist the understanding of the requested photography and the locations from which each photograph is taken from, these must be accompanied with a floor plan with a numbered key, showing the location each photograph is taken from and the direction in which the image is facing; and
c) Provide a colour coded plan of the heritage place to assist in an understanding of the various dates of additions to the heritage place and the dates of the various alterations to the building. This information is required to provide an understanding of the integrity of the heritage place in the context of its heritage significance which identifies alterations to the building are reflective of the evolution of policing on the site.

Response:

Please see the Photo Location document prepared by *Pendergast Architects* that provides additional photography, a keyed floor plan and a colour coded plan identifying the various additions and alterations, as requested within Item 1 of this Information Request.

2. Planning Assessment

In accordance with Table 5.10.12 of the Brisbane City Plan 2014 the development is categorised as impact assessable and is therefore required to be assessed against all relevant assessment benchmarks applicable to the development. While it is acknowledged that an assessment has been provided against the Flood overlay code and Heritage overlay code. Council has identified the following assessment benchmarks as relevant to the proposal and requiring and should be addressed:

a) Centre or mixed use code;
b) South Brisbane riverside neighbourhood plan code; and
c) Transport access parking and servicing code.

Response:

The Applicant maintains the position outlined in Section 5.2 of the Town Planning Report regarding the applicable assessment benchmarks for the application, for the following reasons.

Under the Zone table of assessment, both the building work (BW) and material change of use (MCU) components are Accepted development subject to requirements (ADSR) and comply with the applicable requirements. Accordingly, both components remain Accepted development under the Zone table of assessment.

In relation to the South Brisbane Riverside Neighbourhood Plan (NP), the proposed Office use is contained within an existing premises and does not involve any increase in gross floor area (GFA). Accordingly, the MCU component is ADSR under the NP, with no requirement to assess the proposal against the NP Code, which is not identified as an applicable assessment benchmark. The level of assessment for the BW component is similarly unchanged under the NP.

The applicable overlays elevate the level of assessment to Code assessment for the Flood hazard overlay and, under the Heritage overlay, Code assessment for the MCU component and Impact assessment for the BW component. The relevant assessment benchmarks are the applicable overlay codes. Importantly, these overlays do not trigger assessment against any prescribed secondary codes, particularly in respect of the MCU component.

The applicant acknowledges that the application is subject to Impact assessment; however, this is solely attributable to the proposed BW within the Heritage overlay. Accordingly, pursuant to Sections 5.3.2 and 5.3.3 of Brisbane City Plan 2014, the scope of Impact assessment is limited to the BW component to the extent relevant to the Heritage overlay. On this basis, the Applicant maintains that assessment against the TAPS Code is not required, as it is not triggered by the MCU component and is not relevant to the BW component.

Notwithstanding the above, the Applicant acknowledges Council's comments regarding noise and waste management, which were not expressly addressed in the submitted material. The Applicant confirms that compliance with Acceptable Outcomes AO1 and AO2 of the Centre or mixed-use code can be demonstrated. Accordingly, the MCU component remains Accepted development under the Zone and NP provisions, subject to compliance with the applicable requirements.

3. Traffic

Insufficient information has been provided to demonstrate how the proposal addresses the relevant requirements of the Transport access parking and servicing (TAPS) planning scheme policy (PSP), including access arrangements, on-site parking provision, vehicle manoeuvring, servicing, and waste collection requirements.

a) Provide a Traffic Engineering Report, prepared and endorsed by a suitably qualified RPEQ Traffic Engineer, is required to demonstrate compliance with the applicable provisions of the TAPS PSP.

Response:

As outlined above, the applicant maintains that there is no assessment benchmark for the proposed development which requires assessment against the TAPS code. As such, no further action is required in this regard.

4. Refuse

The plans provided do not provide details as to the location of either a dedicated refuse room (within a building) or refuse enclosure (roofed and wholly screened). Demonstrate the following:

a) In accordance with AO2 / PO2 of the Centre or mixed use code provide amended architectural plans which clearly demonstrates the location of the developments refuse room (within a building) or refuse

enclosure (roofed and fully screened) which is not visible from a street or public space or adjacent residential use.

Note – the refuse solution is required to have a minimum area of 1.8m2 (internal dimensions of 1.8m x 1m) to house two x 240L bins.

Response:

Please see the attached Amended Architectural Plans prepared by *Pendergast Architects* that demonstrate a dedicated refuse storage area accommodating two 240L bins, with minimum internal dimensions of 1.8m by 1m. The refuse area ensures it isnt visible from a street, public space or adjacent residential development and is located at the rear of the building.

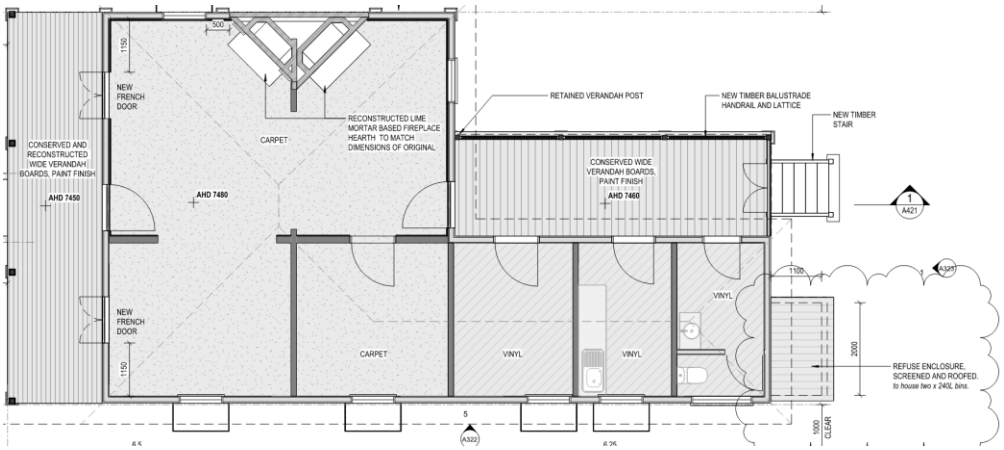


Figure 1: Amended Proposed Ground Floor Plan

5. Noise

To enable assessment against AO1.1 / PO1 of the Centre or mixed use code, provide further information regarding the hours of operation including delivery vehicle operations associated with the facility.

a) Provide details of the proposed hours of operation, including delivery and collection times associated with the facility. Where hours of operation, including deliveries will operate outside the hours of 6am to 10pm (AO1.1), provide a Noise Impact Assessment Report in response to PO1 of the Centre or mixed use code.

Response:

The proposed Office hours of operation, including deliveries and collections, will be limited to between 6am and 10pm, consistent with AO1.1 of the Centre or mixed use code. Accordingly, a Noise Impact Assessment Report is not considered necessary in response to this item.

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.

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

Yours faithfully
TOWN PLANNING ALLIANCE PTY LTD



Brendan Ferris
ASSOCIATE DIRECTOR

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