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APPLICATION REF
A006908306

30 October 2026

Attn: Dominic Hudson
Senior Urban Planner
Planning Services North
Brisbane City Council

Dear Mr Hudson,

Re: 487 Ellison Road, Aspley, QLD, 4034 (Council Ref: A006908306)

Thank you for your letter dated the 2nd of February 2026, requesting further information on the current subject application for a Material Change of Use pertaining to a proposed Health Care Services facility. We refer to the questions asked in the Request for Information and note the following comments in response to the request.

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 250m2;

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.

Response

The proposal is an extension to the established Health Care Service on the site. The Traffic Impact Assessment identifies an existing floor area of 184 sqm and a proposed addition of 187 sqm, resulting in a total GFA of 371 sqm.

We acknowledge that the proposed GFA exceeds the 250 sqm figure in Overall Outcome 4(i) of the Low density residential zone code. The application therefore does not rely on satisfying the small scale GFA element of that outcome. The relevant question is whether the proposal, having regard to its use, scale and setting, remains compatible with the residential area, serves local residents' needs and avoids undermining the nearby district centre.

The proposal retains the site's established health care function and does not introduce a general retail or commercial centre activity. The additional floor area will accommodate the existing service on the same site. The proposed building's residential scale and appearance are shown on the submitted architectural plans. Having regard to the continuing health care use and the design response, the applicant considers that the development will provide a local service while remaining compatible with the surrounding residential area. The proposal is not expected to undermine the nearby district centre because it does not seek to perform the broader retail or centre role served by that 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.

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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.

Response

- Please refer to the updated Flood Assessment justification prepared by Flood Smart Engineering dated the 28th of July 2026.
- Updated plans now reflect a minimum finished floor level of RL22.90m AHD, allowing a now compliant undercroft height of up to 1.8m (refer to attached Architectural elevation plans Rev #12 prepared by Affordable Modular Building, and p.15 of the Flood Assessment Report prepared by Flood Smart Engineering dated the 22nd of July 2026). Given a Performance Outcome is sought, our Flood Engineer determines that the finished floor level of RL22.90m AHD is compliant with the requirements of the Flood overlay code.

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 800 mm 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.

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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.

Response

- Reference is made to Architectural Plan Rev #7 detailing the site plan and proposed carpark with the 2% AEP Flood Level of RL 22.10m AHD. The subject plan is in 2D, however no elevation plan has been provided.
- Reference is made to Architectural Plan Rev #7 providing information pertinent to filling, structural elements, level changes, and drainage adjustments.
- Reference is made to Architectural Plan Rev #7 illustrating a 2D compliant carparking design compliant with the requirements for staff, patients, and persons with disabilities. Furthermore, reference is made to Appendix C of the attached Traffic Impact Assessment Report prepared Quantum Traffic dated the 7th of August 2026 demonstrating circulation areas and accompanying swept paths modelling for the carpark.
- Please refer to the updated Flood Assessment justification prepared by Flood Smart Engineering dated the 28th of July 2026.

<u>Concept Earthworks Plan</u>

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.

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Response

No material earthworks or filling are proposed for the site and subsequently, a Concept Earthworks Plan has not been provided in this response.

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 m2 or greater GFA, the requirement is:

i) 14 spaces plus 5 spaces per 100 m2 GFA.

Note:

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

The report must:

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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.

Response

Please refer to the Traffic Impact Assessment Report prepared by Quantum Traffic dated the 7th of August 2026.

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.

Response

Please refer to Architectural Plan Rev #7 demonstrating the required 6mx6m corner truncation on the corner of Ellison Road and Eustace Street.

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 3.6m2 (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.

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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.

Response

Quantum Traffic's assessment of the site and proposal has determined that refuse has been historically managed kerb-side and this arrangement is expected to continue with the expansion. Nonetheless, reference is made to Appendix C of the attached Traffic Impact Assessment Report prepared Quantum Traffic dated the 7th of August 2026 demonstrating swept path diagrams for refuse collection on the site, in addition to comments made in section 7.2 of the Traffic Impact Assessment Report.

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-

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plan-2014/fact-sheets/guide-preparing-landscape-concept-plan

i. Provide screening to aircon units (either landscaping or screens)

Response

Please refer to the attached Concept Landscape Plan prepared by Affordable Modular Buildings.

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.

Response

Council Approval Group is comfortable with the abovementioned requirement being conditioned as part of the Development Approval.

The applicant is agreeable to conditions requiring the Health Care Service to operate indoors only, with no amplified music. The applicant also accepts conditions requiring a 2 m high acoustic fence and acoustic screening of mechanical plant and equipment, in accordance with AO2.1 of the Community facilities code.

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.

Response

There are no known spray painting facilities within 150m of the subject site.

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

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submit an application to UU for assessment.

Response

Council Approval Group notes this request.

Thank you for your consideration of this Request for Information response and we trust that the above allows you to progress the application through to determination.

Kind regards,

Rupert Luxton

Town Planner

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