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16 January 2026

Kabaro Pty Ltd  
C/- Urbis Ltd  
Level 32, 300 George Street  
BRISBANE CITY QLD 4000

**ATTENTION: Hanah Julius**

**Application Reference:** A006909855  
**Address of Site:** 502 NEWNHAM RD WISHART QLD 4122

Dear Hanah,

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

Council has carried out an initial review of the above application and the proposed development in its current form is not acceptable as it is not considered low key in nature and scale, and is not considered an appropriate size to serve the needs of only the local residential community.

The purpose of the Low density residential zone is to provide for predominantly dwelling houses supported by community uses and small-scale services and facilities that cater for local residents.

It is acknowledged that some non-residential uses may be supported on the subject site, however only if the proposal is relatively small in scale and serves local residential convenient needs. The proposed Health care facility with gross floor area (GFA) of 1,313m<sup>2</sup> is a significant departure from the maximum 250m<sup>2</sup> GFA anticipated for small-scale non-residential uses within the Low density residential zone. A reduction in the overall GFA of the proposed Health care service to be more reflective of a small-scale non-residential use is required in accordance with the applicable benchmarks in City Plan 2014.

It is acknowledged that the subject site adjoins an existing hotel and liquor store, however future land uses on this site are also intended to be low density residential in nature and there is concern that the proposed health care service use and multi dwellings could result in unplanned centre uses.

The proposal, seeking an outcome of 3 multiple dwellings (townhouse style development) in the Low density residential zone, is not in accordance with Overall outcome 4.c of the Low density residential zone code in that the proposed multiple dwelling does not support the intended low density character of this zone. The proposed health care service does not comply with Overall outcome 4.k of the of the Low density residential zone code as it is of a bulk and scale significantly larger than what is expected in the Low density residential zone.

1. Significantly reduce the overall development to be consistent with the expectations of the Low-density residential zone and a small-scale residential use.

The proposed Health care facility will impact the car parking spaces and manoeuvring of the previously approved Hotel and bottle shop (adjoining). Provide a review of the previously approved applications over the adjoining site and rectify any discrepancies by lodging a change application for the hotel/bottle shop;

Where the development has been substantially reduced, addresses the items raised above, and the conflicts between the proposal and existing hotel have been rectified, further information is required to consider a small-scale residential use on the subject site.

### **Needs assessment**

2. The Newnham Road Medical Centre Needs Assessment has been reviewed by Council, and is not considered to provide an adequate assessment of need to support the proposed development.
  - a) Provide a needs assessment that includes a thorough reckoning of demand, supply and a review of the availability and suitability of other appropriately zoned land within the site's catchment to accommodate the proposal, in order to demonstrate that the proposed non-residential use is appropriately located, and serves a local community facility need only in accordance with overall outcome 4(k) of the Low density residential zone code.
  - b) In reviewing the document, Council has also identified discrepancies in the benchmarking related to healthcare workforce data, which will need to be reconciled as part of the requested amendment.

### **Stormwater**

3. The concept drainage plan in the Site Based Stormwater Management Report Revision 01 (ADG Engineers, 31 October 2025) indicates that the health care facility will discharge to a 38kL above ground stormwater detention tank located on the Newnham Hotel premises, with overflows to the internal road of the existing hotel.

The proposed lawful point of discharge is **not supported** as the hotel premises does not form part of the development site. Further there is no information on the existing subsurface and surface drainage system.

  - a) The existing Newnham Hotel drainage will need to be established confirming the legal discharge location, capacity and the ability to accept additional flows. The SBSMP is to be revised to include the hotel drainage system and the proposed development as a whole.

### **Refuse**

4. It is noted that the refuse enclosure provides sufficient storage, capacity, and source separation to cater for the 'Health Care Service' generated waste streams per week. However, require the GFA (m<sup>2</sup>) and internal dimensions of the 'Refuse' to be demonstrated. In accordance with PO15/AO15.1 & AO15.2 of the Small-scale non-residential uses code and PO8/ AO8.1 & AO8.2 of the Infrastructure design code demonstrate the following:
  - a) Clearly demonstrate the GFA (m<sup>2</sup>) and internal dimensions of the 'Health Care Service' uses 'Refuse' enclosure.
5. This health care facility use has the potential to produce clinical and related waste which is classified as regulated waste (refer section 42 of the Environmental Protection Regulation 2019). Segregation, correct storage, and handling of regulated waste must be considered and demonstrated in accordance with Part 5B of the Waste Reduction and Recycling Regulation 2011. Therefore, the proposal must demonstrate that the refuse storage areas for general refuse and regulated waste are separate and clearly labelled. The refuse storage areas must be either within a building or an enclosure.
  - a) Provide amended plans which clearly demonstrates a separate regulated waste storeroom (within a building), or regulated waste enclosure (roofed & fully screened) has been provided for the proposed Health Care Service use. Note – to satisfy this item the indicative location of regulated waste/ clinical bins within each consulting room or tenancy on amended architectural plans will suffice.

6. A review of the 'Urbis P/L – Technical Memorandum' has identified that an RPEQ certified swept path analysis has been included for a 10.24m Rear Loading RCV which demonstrates left-in and left-out servicing in a safe and efficiently manner. However, the vehicle specifications have not specified a lock-to-lock time of 6.00s.
  - a) Provide a revised RPEQ certified swept path analysis for a 10.24m Rear Loading RCV (As per BSD-3008-2) as specified in Table 3 of the Refuse PSP which demonstrates safe and efficient on-site servicing can be undertaken whilst utilising a lock-to-lock time of 6.00s

### **Traffic**

7. The TIA report provided states the peak hour trip generation to be 70 trips during peak hours. While traffic access to the site currently exists via U-Turn on Newnham Rd, the increase in access demands during business hours would likely exacerbate this movement during higher traffic levels, warranting restrictions on Newnham Rd to prevent U-Turn movements to prevent potential unsafe manoeuvring and congestion.
  - a) Provide appropriate traffic signage to prevent Newnham Rd northbound traffic from U-turn at end of centre island on Newnham Road (near Everett Street)
8. The Traffic Report provided has not considered the existing development conditions for the hotel and that it is not adversely impacted.
  - a) Demonstrate that the hotel servicing and car parking arrangements are not detrimentally impacted and comply with City Plan requirements.

### **Landscape and subtropical landscape elements**

9. It is acknowledged that landscape measures have been provided for the development, however additional design amendments are to be undertaken to ensure that the development contributes to the subtropical character, amenity and microclimate.
  - a) Widen the proposed landscape beds along the Newnham Road frontage (remove terracing) and provide additional large subtropical shade trees to assist in the break-up of the built-form and to assist with integrating the development with its surroundings.
  - b) Provide additional deep planting areas along the Newnham Road frontage.
  - c) Clarify how adequate maintenance access can be achieved for all landscape areas, noting that the 3m wide landscape buffers to the adjoining residential are not to be reduced to factor in this access requirement.

### **Streetscape requirements**

10. The development is to ensure that streetscape works (including tree planting, paving and verge and kerb treatments) are designed in accordance with the CP2014's Streetscape Hierarchy Overlay Code, Infrastructure Design Code PO1/AO1, PO4/AO4 and Chapter 3 of the Infrastructure Design Planning Scheme Policy. Additional information is to be provided to demonstrate compliance with CP2014 provisions.
  - a) Provide amended plans demonstrating a minimum 3.75m wide verge is provided for Naples Street and Newnham Road frontages, as required by the Streetscape Hierarchy Overlay Code AO1. Currently the plans do not show the extent (width) of the verge and this information is to be provided on the plans.
  - b) A linear land dedication will be required if the existing verge width is less than 3.75m for each frontage.
  - c) Demonstrate a 1:50 crossfall can be achieved for all verges frontages.

### ***Building Bulk, Articulation, and Setbacks***

11. The proposed setback of the health care facility is not consistent with the front boundary setbacks prevailing the street as required by the Small-scale non-residential code and generates a built form which overwhelms the streetscape when viewed from the footpath and is not of a human scale. Furthermore, due to the proposed setback, there is an inability to establish landscaping and trees substantial enough to appropriately buffer the development from the street, and to provide a positive streetscape interface.
  - a) Amend the design to increase the setback along Newnham Road to provide a minimum setback of 6m.
  - b) Provide stepping within the façade to provide greater pockets for articulation and landscaping.

### ***Subtropical building design***

12. Due to the size of the proposed floor plate of the health care facility and the current depiction of the building, it appears that there will be diminished access to natural light and likely no natural ventilation.
  - a) Provide windows, atriums or balconies to improve access to natural light and ventilation deep into the building.

Where a multiple dwelling is proposed, this may only be considered where it is consistent with the low scale nature anticipated within the Low density residential zone, generally have the appearance of low density dwellings and generally comply with all the acceptable outcomes of the Multiple dwelling code.

### ***Traffic***

13. The proposal for 3 individual lot access from Naples Street is not supported. Individual crossovers at all three townhouse sites would increase the conflict points, increasing potential safety risks. A single consolidated access for two of the townhouses should be provided from Naples Street to serve 2 of the 3 lots, maintaining current lot access levels and conflict points.
  - a) Any units proposed to face along Naples Street is to maintain a maximum of two crossovers located no closer to the corner than the current crossover.

### ***Refuse***

14. A review of the 'Proposed Ground Floor', Sheet No. DA-110, Issue: 3 has not demonstrated the location of a roofed and wholly screened 'refuse enclosure' to store Townhouse 1 – 3 Mobile Garbage Bins (MGBs). It is unclear if each townhouse has been provided with a presentation area in front of each lot to present MGBs. In accordance with PO32/ AO32 of the Multiple dwelling code and PO8/ AO8.1 & AO8.2 of the Infrastructure design code:
  - a) Any proposed unit is to each be provided a refuse enclosure (roofed & wholly screened) located outside of dwelling &/ garage which has a minimum GFA of 2.355m<sup>2</sup> (internal dimensions of 2.355m x 1m) to store three (3) x 240L Mobile Garbage Bins (MGBs). Note - It is not acceptable to store Bins within a dwelling or garage.
  - b) Clearly demonstrate on amended architectural plans that each unit has been provided a minimum presentation area of 1.8m wide in front of their lot to present bins along the Naples Street frontage for collection. Ensure presentation areas do not conflict with driveways, wing tapers or verge street trees &/ landscaping.

### **Private open space**

15. The units as proposed do not achieve the minimum requirement of 35m<sup>2</sup> of ground floor private open space per unit unobstructed by deep planting.
- a) Where a multiple dwelling is proposed, a minimum of 35m<sup>2</sup> of private open space is to be provided for each individual unit.

### **Landscaping**

16. Where a multiple dwelling is proposed, each private courtyard is to be provided a shade tree species that will meet the minimum 5m wide canopy requirement for deep planting.
- a) The landscape design for each unit is to show the 5m wide dimension for the tree symbology and a revised proposed plant species schedule list is to be provided.

### **Subtropical building design**

17. The proposed units, as currently proposed are single loaded by virtue of being attached to the health care facility and one another, and appear to include fixed glazing, and are impacted by air quality overlays with diminished landscaping where interfacing with Newnham Road. This design does not reduce the reliance on mechanical heating and cooling or support subtropical indoor/ outdoor living. Where a multiple dwelling is proposed it is to include:
- a) Operable windows
  - b) Consider louvre windows where dual aspect windows are not possible or where sliding doors are the only aperture to increase access to natural ventilation
  - c) Demonstrate that fans will be installed into the dwellings habitable rooms.
  - d) More substantial planting on the corner of Newnham Road and Naples Street to assist in combating air quality issues.

### **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 A006909855.

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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