

# Planning Report

16 Twenty-Fourth Avenue, Brighton

**For:** LDK Healthcare Pty Ltd

**Date:** September 2026



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Version History

| Version | Description  | Author      | Reviewed  | Date       |
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| 1       | Client issue | Tom Kennedy | Toby Heap | 31/08/2026 |
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# Summary

## Site and Planning Framework

**Table A** below provides a summary of the key site details and relevant planning framework information.

Table A – Site and Planning Framework Details

| Site Details                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Address                               | 16 Twenty-Fourth Avenue, Brighton QLD 4017                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Real Property Description             | Lot 23 on SP233993                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Area                                  | 21,000m <sup>2</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Owner/s                               | LDK Brighton Pty Ltd                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Easement/s                            | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Local Planning Matters                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Local Government                      | Brisbane City Council                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Planning Scheme                       | Brisbane City Plan 2014 (v36)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Strategic Framework                   | Suburban Living Area                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Zone (zone precinct)                  | Community facilities zone (CF7 - Health care purposes zone precinct)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Neighbourhood Plan                    | Sandgate district neighbourhood plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Overlays                              | <ul style="list-style-type: none"> <li>■ Airport environs overlay               <ul style="list-style-type: none"> <li>○ OLS - Horizontal limitation surface boundary</li> <li>○ Procedures for air navigation surfaces (PANS)</li> <li>○ BBS zone - Distance from airport 8-13km</li> </ul> </li> <li>■ Bicycle network overlay               <ul style="list-style-type: none"> <li>○ Secondary cycle route</li> </ul> </li> <li>■ Coastal hazard overlay               <ul style="list-style-type: none"> <li>○ Erosion prone area - coastal erosion sub-category</li> <li>○ Erosion prone area - permanent inundation due to sea level rise at 2100 sub-category</li> <li>○ High storm-tide inundation area sub-category</li> <li>○ Medium storm-tide inundation area sub-category</li> </ul> </li> <li>■ Critical infrastructure and movement network overlay               <ul style="list-style-type: none"> <li>○ Critical infrastructure and movement planning area sub-category</li> </ul> </li> <li>■ Heritage overlay               <ul style="list-style-type: none"> <li>○ Local heritage place sub-category</li> <li>○ Area adjoining heritage sub-category</li> </ul> </li> <li>■ Potential and actual acid sulfate soils overlay               <ul style="list-style-type: none"> <li>○ Potential and actual acid sulfate soils sub-category</li> <li>○ Land at or below 5m AHD sub-category</li> </ul> </li> <li>■ Road hierarchy overlay               <ul style="list-style-type: none"> <li>○ Suburban road – Hornibrook Highway</li> <li>○ Neighbourhood road – Twenty-Fifth Avenue and Twenty-Fourth Avenue</li> </ul> </li> <li>■ Streetscape hierarchy overlay               <ul style="list-style-type: none"> <li>○ Neighbourhood street major</li> </ul> </li> </ul> |
| Local Government Infrastructure Plan  | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Temporary Local Planning Instrument/s | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| State Planning Matters                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| State Planning Policy                 | <ul style="list-style-type: none"> <li>■ Natural Hazards Risk and Resilience               <ul style="list-style-type: none"> <li>○ Flood hazard area - local government flood mapping area</li> <li>○ Medium storm tide inundation area</li> <li>○ High storm tide inundation area</li> <li>○ Erosion prone area</li> </ul> </li> <li>■ Strategic Airports and Aviation Facilities               <ul style="list-style-type: none"> <li>○ Obstacle limitation surface area</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

|                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                | <ul style="list-style-type: none"> <li>○ Wildlife hazard buffer zone</li> <li>○ Aviation facility</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Development Assessment Mapping | <ul style="list-style-type: none"> <li>■ SEQ Regional Plan Triggers <ul style="list-style-type: none"> <li>○ SEQ Regional Plan land use categories – Urban Footprint</li> </ul> </li> <li>■ Coastal Protection <ul style="list-style-type: none"> <li>○ Coastal area - erosion prone area</li> <li>○ Coastal area - medium storm tide inundation area</li> <li>○ Coastal area - high storm tide inundation area</li> </ul> </li> <li>■ Water Resources <ul style="list-style-type: none"> <li>○ Water resource planning area boundaries</li> </ul> </li> </ul> |

## Development Application Details

**Table B** below provides an overview of the development application.

**Table B – Development Application Details**

| Development Application Details |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Development Particulars         | <ul style="list-style-type: none"> <li>■ Development permit for Carrying out building work for partial demolition and relocation of a Local heritage place;</li> <li>■ Development permit for Carrying out building work on a Local heritage place; and</li> <li>■ Preliminary approval for a Material change of use (Community care centre, Community use, Retirement facility, Residential care facility and Indoor sport and recreation) including a Variation request to vary the effect of the Brisbane City Plan 2014 (Heritage overlay).</li> </ul> |
| Category of Assessment          | Impact assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Public Notification             | Required – 30 business days                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Assessment Manager              | Brisbane City Council                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Referral(s)                     | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Applicant Details               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Applicant                       | LDK Healthcare Pty Ltd                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Applicant Representative        | Therefor Group                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Contact Person                  | Toby Heap – Principal Planner<br><a href="mailto:theap@thereforgroup.com.au">theap@thereforgroup.com.au</a><br>(07) 3666 5200                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Reference:                      | 24-0678P/02                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

## Supporting Material

**Table C** below provides an overview of the supporting material which accompanies this application and has been incorporated and referenced throughout this report.

**Table C – Supporting Material**

| Document Title               | Prepared By                    | Date       |
|------------------------------|--------------------------------|------------|
| Architectural Plans          | Rothelowman                    | 16/09/2026 |
| Heritage Impact Assessment   | Urbis                          | 16/09/2026 |
| Construction Management Plan | FKG                            | 15/09/2026 |
| Structural Review Letter     | Inertia Engineering            | 15/09/2026 |
| Asbestos Survey Report       | Kiwa ELS                       | 27/08/2026 |
| Site Searches                | Therefor Group                 | 16/09/2026 |
| Owner's Consent              | Therefor Group (Signed by LDK) | 16/09/2026 |
| DA Form 1                    | Therefor Group                 | 16/09/2026 |
| DA Form 2                    | Therefor Group                 | 16/09/2026 |

# 1. Introduction

On behalf of LDK Healthcare Pty Ltd, Therefor Group has prepared this planning report in support of a development application for the proposed development which is made over the land at 16 Twenty-Fourth Avenue, Brighton, formally described as Lot 23 on SP233993 (**site**).

Specifically, this development application is seeking approval for the following aspects of development (**proposed development**):

- Development permit for Carrying out building work for partial demolition and relocation of a Local heritage place;
- Development permit for Carrying out building work on a Local heritage place; and
- Preliminary approval for a Material change of use (Community care centre, Community use, Retirement facility, Residential care facility and Indoor sport and recreation) including a Variation request to vary the effect of the Brisbane City Plan 2014 (Heritage overlay).

The development application is subject to **impact assessment** and will be publicly notified for a minimum of 30 business days.

This report addresses the merits of the proposed development and provides an in-depth discussion and assessment of the proposed development with respect to the relevant provisions of the state and local planning instruments, the *Planning Act 2016* (**Planning Act**) and other relevant legislation.

In conjunction with the supporting material, this report aims to outline the facts and circumstances which weigh in favour of approval of the proposed development, and demonstrate it should be approved, subject to reasonable and relevant conditions.

Specifically, this report provides the following to assist in assessment of the development application:

- An overview of the key aspects of the proposed development.
- A summary of the planning merit and alignment with the planning intent for the site and wider area.
- A site analysis which provides details of the key characteristics of the site and surrounding area, including relevant development approval/s.
- A summary of the technical analysis which has informed the design of the proposed development.
- An overview of the state planning framework as it relates to the site, including referral details and some commentary on the proposed development's alignment with the state planning interests, where relevant.
- An overview of the local planning framework as it relates to the site, including some commentary on the proposed development's alignment with the local planning intent.

## 2. Proposed Development

### 2.1 Overview

The proposed development seeks to provide for the relocation and improvement of the Sandgate RAAF Training Base local heritage place. The existing huts comprising the local heritage place are located in the south-east corner of the site, with limited visibility to the general public and are unsafe for occupation or use. The proposed development will relocate the heritage huts to the centre of the site and facilitate its partial demolition and new works to the buildings to make them safe, useable, and compliant with modern codes where possible.

The proposed development seeks a Preliminary approval, which includes a variation request to vary the extent of the Heritage overlay mapping on the site. The amended Heritage overlay curtilage will ensure that future works associated with the local heritage place remain subject to the Local heritage place sub-category of the Heritage overlay. Any development proposed on the land that is no longer improved by the local heritage place will be subject to the 'Area adjoining heritage sub-category' of the Heritage overlay.

A number of potential future land uses have been identified within the preliminary approval sought. The establishment of these land uses is not proposed to occur within the scope of this application.

Each of the land uses included within the preliminary approval are anticipated within the Community facilities zone (Health care purposes zone precinct). Their inclusion within this application is intended to provide a framework for future development that is anticipated by the planning scheme, to be carried out in accordance with the revised Heritage overlay mapping.

Accordingly, this Report and the supporting common material do not assess the merits or function of any future land uses that may be the subject of separate development applications.

Key features of the proposed development include:

- Repositioning the two heritage huts from the south-east corner of the site, to a prominent position in the centre of the site with frontage to Twenty-Fourth Avenue;
- The demolition and replacement of dilapidated building components, including damaged parts of weatherboard walls, wall lining and roof sheeting;
- The demolition of existing foundations and construction of new concrete stumps;
- The refurbishment and addition of external treatments, including windows, weatherboard and timber stairs and eaves; and
- Variation of the Heritage overlay mapping under Brisbane City Plan 2014 to reflect the repositioned local heritage place.

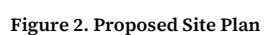
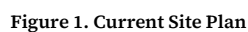
### 2.2 Key Aspects

#### 2.2.1 Repositioning

The proposed development involves the internal relocation of the Sandgate RAAF Training Base huts from the south-east corner of the site, as illustrated in Figure 1, to a central location within the site with frontage to Twenty-Fourth Avenue, as illustrated in Figure 2 overleaf.

The proposed relocation of the heritage huts to the Twenty-Fourth Avenue frontage will improve the visibility and appreciation of the local heritage place from public viewpoints. The relocated heritage huts will be appropriately separated from each other and adjoining property boundaries, as detailed below:

- 3.375m front boundary setback to Twenty-Fourth Avenue;
- 17.680m eastern side boundary setback; and
- 11.100m building separation between Hut 1 and Hut 2.



### 2.2.2 Demolition and Reconstruction

The proposed development involves the partial demolition of components of the local heritage place, to be replaced by elements with a comparable appearance and improved structural integrity. A detailed overview and assessment of the proposed demolition, reconstruction and refurbishment works is provided in the **Heritage Impact Assessment** prepared by Urbis.

### 2.2.3 Construction Methodology

Construction of the proposed development will be informed by the methodology outlined in the **Construction Management Plan** prepared by FKG Group. The CMP indicates that the huts are to be moved whole, and lowered onto a completed, levelled sub-structure. The phases of relocation are detailed below:

1. Archival recording;
2. Asbestos management;
3. Conditioning and strip-out;
4. Sub-structure to new location;
5. Lift and relocation;
6. Structural hold points; and
7. Reinstatement and restoration.

## 2.3 Variation to Heritage Overlay

The proposed development seeks a preliminary approval, which is inclusive of a Variation request to vary the effect of the planning scheme, specifically the Heritage overlay. The proposed variation will provide the framework for any future works to the local heritage place to be captured within the Heritage overlay and relevant assessment benchmarks.

The site is subject to the Heritage overlay, which is split into the following sub-categories:

- Local heritage place sub-category is mapped over the south-eastern corner of the site, in alignment with the current location of the subject buildings; and
- Area adjoining heritage sub-category across the balance of the site.

It is requested that Council vary the following:

- Heritage overlay (Local heritage place sub-category) curtilage to reflect the position of the local heritage place, after it has been relocated;
  - The proposed curtilage will include a 2m envelope from the eave lines of both relocated buildings; and
- Heritage overlay (Area adjoining heritage sub-category) to apply to the balance of the site.

For more details on the proposed relocated overlay, refer to the proposed Heritage Overlay extent detailed in the Proposed Site Plan (drawing TP01.04) in the proposed **Architectural Plans**, also illustrated in Figure 2 above.

This variation request seeks to ensure alignment of the Heritage overlay to the location of the local heritage place, and does not involve any amendments to Table 5.10.12 of the planning scheme, or the Heritage overlay code.

It should be acknowledged that proposed variation request for the overlay is facilitated by the preliminary approval component of the development application that seeks preliminary approval for land uses anticipated by the Community facilities zone (Health care purposes zone precinct) The proposed preliminary approval provides a framework for the variation request and the continued use of land for community facilities in line with the zone precinct; however, the proposed development does not seek to directly establish the stated land uses within the scope of this development application.

## 3. Site Analysis

### 3.1 Overview

The site is located in the northern bayside suburb of Brighton, across an expansive land parcel at 16 Twenty-Fourth Avenue, Brighton, and is more formally described as Lot 23 on SP233993 (**site**). The site is currently vacant across its predominant extent and is improved by two buildings in its south-eastern corner, which is cited in the Brisbane City Council heritage register as the ‘Ex RAAF Barracks (Two) - Sandgate RAAF Training Base (former)’, otherwise known as the Sandgate RAAF Training Base.

The site has an expansive land area of 21,000m<sup>2</sup> and is generally rectangular in shape, with approx. 150m of frontage to the Hornibrook Highway, approx. 118m to Twenty-Fifth Avenue and 53m to Twenty-Fourth Avenue.



Figure 3. Aerial imagery of site (NearMap – June 2026)

### 3.2 Site Characteristics and Servicing

**Table D** below provides an overview of the key site characteristics and servicing information.

Table D – Site Characteristics and Servicing Information

| Site Characteristics                         |                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Existing Use / Improvements                  | As shown in the aerial imagery above, the site is currently improved by the ‘Ex RAAF Barracks (Two) - Sandgate RAAF Training Base (former)’ local heritage place in its south-eastern corner. The balance of the site remains bereft of improvements.                                                        |
| Access and Frontage                          | The site has frontage of approx. 150m of frontage to the Hornibrook Highway, approx. 118m to Twenty-Fifth Avenue and 53m to Twenty-Fourth Avenue.                                                                                                                                                            |
| Easement/s                                   | N/A                                                                                                                                                                                                                                                                                                          |
| Topography                                   | The site grades easterly from a peak elevation in excess of 3m at the south-west corner of the site, to a low point of 2m at the eastern property boundary.                                                                                                                                                  |
| Vegetation                                   | The site is subject to a varied distribution of vegetation, which is particularly clustered along its western and eastern property boundaries. It is noted that the vegetation on the site is not subject to protection under State mapping, Brisbane City Plan 2014 or the Natural Assets Local Law (NALL). |
| Waterways and Waterbodies                    | The site does not contain any mapped waterways or waterbodies.                                                                                                                                                                                                                                               |
| Contaminated Land / Environmental Management | The site is not identified on the contaminated land or environmental management register/s (see attached <b>Site Searches</b> ).                                                                                                                                                                             |

| Servicing Information                   |                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Water                                   | The site is located in proximity to the existing water network, which includes a water pressure main at the Twenty-Fifth Avenue frontage and near to the site's Twenty-Fourth Avenue frontage. Connection to the water network is proposed under the current development application over the site (A006934945).                                                                            |
| Sewer                                   | The site is bisected by an existing trunk sewer main, which has two sewer manholes located within the site. Connection to the sewer network is proposed under the current development application over the site (A006934945).                                                                                                                                                               |
| Stormwater                              | The site is located in proximity to the existing stormwater network, including gully inlets to the east at Twenty-Fourth Avenue and Twenty-Fifth Avenue. The gully inlets provide connection to stormwater drainage which flows eastwards to Moreton Bay. Extension of the stormwater network to the site is proposed under the current development application over the site (A006934945). |
| Electricity, Gas and Telecommunications | The site is located in proximity of existing electricity, gas and telecommunications networks.                                                                                                                                                                                                                                                                                              |

### 3.3 Context

The site is located in the northern bayside suburb of Brighton, proximate to the boundary of the City of Brisbane local government area. The site has a diverse context, which is characterised below:

- **North:** The site fronts to Decker Park at its northern interface, which is an expansive district park which extends to Moreton Bay. Further to the north is the Houghton Highway, which provides a bridge connection from the City of Brisbane to the Redcliffe Peninsula.
- **East:** The site has an immediate interface to land within the Character residential zone and is located within 100m of Moreton Bay.
- **South:** The site adjoins the Brighton Health Campus to the south, which covers in excess of 10ha of land and is occupied by a mix of health care services and residential care activities.
- **West:** The site fronts to the Hornibrook Highway, which has an expansive road reserve width of 20m – 25m. Further to the west, land within the Low density residential zone is improved by townhouses and a relocatable home park.

### 3.4 Development Application and Approval History

#### Subject Site

**Table E** below provides an overview of the application and approval history of the site, where relevant.

Table E – Site Application and Approval History

| Council Reference | Description                                                                    | Approval Date          |
|-------------------|--------------------------------------------------------------------------------|------------------------|
| A006934945        | Material change of use for Retirement facility and Residential care facility   | N/A – Under assessment |
| A007007274        | Exemption Certificate for Temporary Sales Office                               | 11 May 2026            |
| A007042841        | Heritage Exemption Certificate for vegetation clearing in the Heritage overlay | 15 June 2026           |

## 4. Planning Merits

### 4.1 Variation Request

The proposed development seeks a Preliminary approval which includes a Variation request to vary the mapping of the Heritage overlay on the site, to reflect the relocated position of the local heritage place.

Section 61(2) of the Planning Act states that:

*When assessing the variation request, the assessment manager must consider—*

- (a) *the result of the assessment of that part of the development application that is not the variation request; and*
- (b) *the consistency of the variations sought with the rest of the local planning instrument that is sought to be varied; and*
- (c) *the effect the variations would have on submission rights for later development applications, particularly considering the amount and detail of information included in, attached to, or given with the application and available to submitters; and*
- (d) *any other matter prescribed by regulation.*

A response to the criteria contained in Section 61(2) is provided in **Table F** below.

**Table F - Response to Criteria of Section 61(2) of the Planning Act for a Variation Request**

| Section 61(2)                                                                                                                                                                                                                                            | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (a) the result of the assessment of that part of the development application that is not the variation request; and                                                                                                                                      | The variation request will not prejudice the assessment of other aspects of the demolition for the partial demolition, repositioning and reconstruction of the local heritage place. The proposed works contained in the development application remain assessable against the Heritage overlay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| (b) the consistency of the variations sought with the rest of the local planning instrument that is sought to be varied; and                                                                                                                             | <p>The extent of variations sought within this application is limited to the realignment of the Heritage overlay on the site, to reflect the proposed repositioning of the local heritage place. The proposed variations do not relate to any provisions contained in the planning scheme, nor does it affect the Heritage overlay mapping beyond the extent of the site.</p> <p>The land uses identified within the preliminary approval (Community care centre, Community use, Retirement facility, Residential care facility and Indoor sport and recreation) are each anticipated by the Community facilities zone (Health care purposes zone precinct).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| (c) the effect the variations would have on submission rights for later development applications, particularly considering the amount and detail of information included in, attached to, or given with the application and available to submitters; and | <p>The variation request seeks to align the Heritage overlay mapping with the proposed relocation of the local heritage place towards the centre of the site. The alignment of the Heritage overlay mapping and the local heritage place will maintain a clear planning framework for the assessment of any future works to the local heritage place.</p> <p>The land uses identified within the preliminary approval (Community care centre, Community use, Retirement facility, Residential care facility and Indoor sport and recreation) are each anticipated by the Community facilities zone (Health care purposes zone precinct) and would be subject to code assessment pursuant to Table 5.5.19 of the planning scheme.</p> <p>The proposed variation provides for future development on land previously subject to the 'Local heritage place sub-category' of the Heritage overlay, to be subject to the 'Area adjoining heritage sub-category' of the Heritage overlay. The proposed variation will not alter the level of assessment for a future material change of use for the stated uses on the site and will not affect established submission rights.</p> |
| (d) any other matter prescribed by regulation.                                                                                                                                                                                                           | A response to Other Relevant Matters is provided in Section 8 of this Report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

## 4.2 Retention of Heritage Significance

The **Heritage Impact Statement** prepared by Urbis confirms that the proposed development will not negatively impact on the cultural heritage significance of the place. The proposed development will retain the historical and typological values of the buildings as wartimes structures.

The proposed development will undertake necessary demolition of parts of the buildings due to poor condition and/or the presence of hazardous materials. It is proposed that the reconstruction of significant building fabric will be undertaken with modern fabric to match the form, materiality, appearance and presentation of the existing significant fabric to be removed. It is further proposed that reconstruction of new casement windows and new timber weatherboard infill to match the existing elements of the main elevations of the buildings.

Further, the setting of the buildings is not identified to be a major component of the cultural significance of the buildings, which previously been subject to change. Notwithstanding, the **Heritage Impact Statement** further determines that the proposed relocation works will maintain the repetitive building form and the regular nature of military building placement and site planning.

The proposed development complies with each of the relevant provisions of the Heritage overlay code, which is addressed in the **Heritage Impact Statement** enclosed within the lodgement material.

## 4.3 Continued use of land for Community facilities

The proposed development accords with the intent of the Community facilities zone code, through the continued use of land for community facilities and retention of capacity for future expansion. The partial demolition, relocation and reconstruction of the heritage place will not affect its function and capacity to be adaptively reused for community facilities into the future.

The proposed works will provide for improvement to the structural integrity and useability of the local heritage place and will not impede the opportunity for expansion or establishment of a new community facility within the built form.

Further, the proposed variation request provides a framework for future development of land uses (Community care centre, Community use, Retirement facility, Residential care facility and Indoor sport and recreation), that are each anticipated by the Community facilities zone (Health care purposes zone precinct) and would be subject to code assessment pursuant to Table 5.5.19 of the planning scheme.

The proposed development complies with the Community facilities zone code, to the extent relevant, as assessed in **Table I** of this Report.

## 5. Technical Analysis

The proposed development will involve works and other outcomes which require technical assessment. A number of technical reports have been prepared to accompany this development application and are summarised below.

### 5.1 Heritage Impact Statement

A **Heritage Impact Statement** report has been prepared by Urbis in support of the proposed development. The report provides a detailed overview of the place and its cultural significance including documentary and physical evidence, the proposed works and an assessment of the proposed works in accordance with The Burra Charter and the Heritage overlay code of the planning scheme.

### 5.2 Construction Management Plan

A **Construction Management Plan (CMP)** has been prepared by FKG Group in support of the proposed development. The CMP provides a high-level construction staging strategy for the partial demolition partial demolition, relocation and restoration of the huts, and the framework by which these works will be planned, controlled and documented.

The CMP is preliminary in nature to support sequencing and an understanding of construction methodology for the purpose of this development application. A detailed construction methodology will be prepared and submitted prior to the commencement of works.

### 5.3 Structural Review Letter

A **Structural Review Letter** has been prepared by Inertia Engineering in support of the proposed development. The Structural Review Letter provides confirmation of the findings of a Structural Condition Report previously prepared by vT Consulting Engineers in December 2024 (**previous report**). The previous report, as confirmed by the Structural Review Letter, confirms that there are no significant engineering challenges in relation to the relocation of existing buildings or the facilitation of architectural modifications.

### 5.4 Asbestos Survey Report

An **Asbestos Survey Report** has been prepared by Kiwa ELS in support of the proposed development. The Asbestos Survey Report has been prepared to confirm the location of asbestos containing materials within all reasonable accessible areas of the heritage place on the site. The Asbestos Survey Report provides a number of findings and recommendations which have informed, and will continue to inform, the Construction Management Plan for FKG Group.

## 6. State Planning Framework

### 6.1 Planning Act 2016

The *Planning Act 2016* (**Planning Act**) and its subordinate legislation is the statutory framework for decision making in relation to land use and development in Queensland.

The proposed development constitutes the following aspects of “development” as defined in Schedule 2 of the Planning Act:

- Material change of use
- Carrying out building work

#### 6.1.1 Category of Assessment

In accordance with section 43 of the Planning Act, the relevant categorising instrument for this development application is the Brisbane City Plan 2014 (**planning scheme**). As identified in **Section 7.2.1** of this report, the planning scheme categorises the proposed development as **impact assessable**.

Section 45(5) of the Planning Act states:

*An impact assessment is an assessment that—*

*(a) must be carried out—*

- (i) against the assessment benchmarks in a categorising instrument for the development; and*
- (ii) having regard to any matters prescribed by regulation for this subparagraph; and*

*(b) may be carried out against, or having regard to, any other relevant matter, other than a person’s personal circumstances, financial or otherwise.*

The matters outlined in section 45(5)(a)(i) above are identified in **Section 7.2** of this report and subsequently addressed.

With respect to section 45(5)(a)(ii), the matters Planning Regulation prescribes are:

- The matters stated in Schedules 9 and 10 of the Planning Regulation for the development.
- The planning scheme (see **Section 7** of this report).
- The regional plan for the region, to the extent it is not identified in the planning scheme as being appropriately integrated.
- The State Planning Policy, to the extent it is not identified in the planning scheme as being appropriately integrated.
- Any designation applying to the premises.
- Any temporary State Planning Policy applying to the premises.
- Any development approval for, and any lawful use of, the premises or adjacent premises (see **Section 3.4**).
- The common material.

Unless otherwise stated, the following sections assess the development application against the above matters.

In respect to section 45(5)(b), an assessment of ‘other relevant matters’ is included in **Section 8** of this report.

### 6.2 Planning Regulation 2017

The purpose of the *Planning Regulation 2017* (**Planning Regulation**) is to prescribe instruments and address matters provided for under the Planning Act and provide the mechanics for the operation and implementation of the Planning Act.

#### 6.2.1 Schedules 9 and 10 (Assessable Development and Referrals)

Schedules 9 and 10 of the Planning Regulation outlines various types of development which are prohibited development, assessable development or development requiring referral agency assessment. The Development Assessment Mapping System (**DAMS**) assists to identify development assessment triggers and referrals under the Planning Regulation.

The mapping (refer attached **Site Searches**) and the regulation have been reviewed in the context of this development application and the following is confirmed:

- The proposed development **is not** prohibited development.

- The proposed development **is not** assessable development pursuant to Schedule 9 or 10 of the Planning Regulation.
- The proposed development **does not** require referral.

## 6.3 Regional Plan

The site falls within the bounds of the South East Queensland Regional Plan 2023 (**ShapingSEQ**). ShapingSEQ provides the framework for managing growth, change, land use and development in the SEQ Region to the year 2046.

### 6.3.1 SEQ land use category

As shown in **Figure 4** below, the site is located within the Urban footprint defined by ShapingSEQ. Land within the urban footprint is considered generally suitable for urban development subject to consideration of State and local planning constraints and assessment matters. The proposed development is consistent with this intent.



Figure 4. SEQ land use category (DAMS Mapping)

## 6.4 State Planning Policy

The current State Planning Policy (July 2017) (**SPP**) relates to 17 separate State interests grouped together under 5 broad themes and provides direction to local governments in preparation of planning documents and assessment of development applications. Where one or more State interest policies are not integrated into a local government's planning scheme, the local government must, to the relevant extent, have regard to Part C (purpose and guiding principles), D (State interests) and E (State interest policies) of the SPP.

Pursuant to Part 2.1 of the planning scheme, the only items of the SPP which have not been integrated are:

- State interest – Natural hazards, risk and resilience – The bushfire prone area in the planning scheme does not reflect the State mapping layer.
- State interest – Strategic airports and aviation facilities – The building restricted area is not identified in the planning scheme.

State interest matters are spatially defined as layers included in the SPP interactive mapping system to assist local government, the community and industry understand and interpret where and how state interest policies apply in land use planning and development. A full copy of the SPP report can be found in the **Site Searches**.

As the site is not identified as being mapped under any layers which have not been integrated in the planning scheme, no further assessment against the SPP is required.

## **6.5 Designated Premises**

The site is not identified as being a designated premises.

## **6.6 Temporary State Planning Policies**

No temporary State planning policies have been identified as being relevant to the site or this development application.

## 7. Local Planning Framework

### 7.1 Planning Scheme

The Brisbane City Plan 2014 (**planning scheme**) is the key local planning instrument which sets out the intent for development within the bounds of the Brisbane City Council local government area.

### 7.2 Category of Assessment and Assessment Benchmarks

#### 7.2.1 Summary

**Table G** below summarises the category of assessment for the proposed development and the relevant assessment benchmarks of the planning scheme. As identified below, the development application will be subject to **impact assessment**.

Table G – Category of Assessment and Assessment Benchmarks

| Type                                                 | Category of Assessment   | Assessment Benchmark/s                                                                                                                                                                             | Response Location                           |
|------------------------------------------------------|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| Heritage overlay                                     | <b>Impact assessment</b> | Heritage overlay code                                                                                                                                                                              | <b>Heritage Impact Assessment</b>           |
| Community facilities zone code                       | <b>No change</b>         | The planning scheme, including: <ul style="list-style-type: none"><li>■ Strategic framework</li><li>■ Community facilities zone code</li><li>■ Sandgate district neighbourhood plan code</li></ul> | <b>Section 7.2.2 – 7.2.4 of this Report</b> |
| Airport environs overlay                             | <b>Not Applicable</b>    | -                                                                                                                                                                                                  | -                                           |
| Bicycle network overlay                              | <b>Not Applicable</b>    | -                                                                                                                                                                                                  | -                                           |
| Coastal hazard overlay                               | <b>Not Applicable</b>    | -                                                                                                                                                                                                  | -                                           |
| Critical infrastructure and movement network overlay | <b>Not Applicable</b>    | -                                                                                                                                                                                                  | -                                           |
| Potential and actual acid sulfate soils overlay      | <b>Not Applicable</b>    | -                                                                                                                                                                                                  | -                                           |
| Road hierarchy overlay                               | <b>Not Applicable</b>    | -                                                                                                                                                                                                  | -                                           |
| Streetscape hierarchy overlay                        | <b>Not Applicable</b>    | -                                                                                                                                                                                                  | -                                           |
| Transport noise overlay                              | <b>Not Applicable</b>    | -                                                                                                                                                                                                  | -                                           |

#### 7.2.2 Strategic framework

The Strategic Framework sets out the policy direction for the planning scheme and forms the basis for ensuring appropriate development occurs throughout Brisbane for the life of the planning scheme. As the proposal is assessable against the planning scheme, additional information has been provided below to demonstrate how the proposed changes are consistent with the planning scheme intent.

The Strategic Framework comprises the following five (5) themes that collectively represent the policy intent of the scheme:

- Brisbane's globally competitive economy;
- Brisbane's outstanding lifestyle;
- Brisbane's clean and green leading environmental performance;
- Brisbane's highly effective transport and infrastructure; and
- Brisbane's CityShape.

In light of the proposed development's scope and relation to Heritage, the relevant extent of the Strategic Framework is limited to Theme 2: Brisbane's outstanding lifestyle and Element 2.1 – Brisbane's identity as identified in the Heritage Overlay Code.

## Theme 2: Brisbane's outstanding lifestyle

### Element 2.1 – Brisbane's identity

The proposed development is compliant with the strategic directions contained in Element 2.1, specifically the relevant Heritage outcomes contained in SO19 – SO22 of Table 3.4.2.1 of the planning scheme, as detailed in **Table H** below.

Table H – Response to Strategic Framework Element 2.1

| Specific outcomes                                                                                                | Land use strategies                                                                                                                                                                                                                                                                                                                                                           | Response                                                                                                                                                                                                                                                                                                                  |
|------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Heritage, character and cultural values</b>                                                                   |                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                           |
| <b>SO19</b><br>Brisbane's important buildings and places that are important to the city's history are protected. | <b>L19.1</b><br>Heritage places of important local (city-wide) or State cultural heritage significance or special significance to Aboriginal people are identified and protected in accordance with the principles of The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance.                                                                    | <b>Complies with L19.1</b><br>The Heritage overlay (Local heritage place sub-category) applies to the extent of the site that the existing built form is located within. The proposed development seeks to relocate the existing local heritage place within the site, and vary the Heritage overlay mapping accordingly. |
|                                                                                                                  | <b>L19.2</b><br>The adaptation or re-use of a heritage place that conserves the cultural heritage significance of the place is supported.                                                                                                                                                                                                                                     | <b>Complies with L19.2</b><br>The proposed development provides for the partial demolition and reconstruction of a dilapidated local heritage place, and will enable future adaptive reuse.                                                                                                                               |
|                                                                                                                  | <b>L19.3</b><br>Development on or adjoining a heritage place protects the cultural heritage significance of the place.                                                                                                                                                                                                                                                        | <b>Complies with L19.3</b><br>The proposed development will retain and enhance the appreciation of the local heritage place's cultural heritage significance.                                                                                                                                                             |
| <b>SO20</b><br>Brisbane's distinctive suburban identity is reinforced by its character housing precincts.        | <b>L20.1</b><br>Character buildings built in 1946 or before are protected via overlays.                                                                                                                                                                                                                                                                                       | <b>Not Applicable</b><br>The site is not located within the Character residential zone, or the Traditional building character overlay.                                                                                                                                                                                    |
|                                                                                                                  | <b>L20.2</b><br>Development proposals maintain the traditional building character housing that individually and collectively contributes to the distinctive character of the area and streetscape.                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                           |
|                                                                                                                  | <b>L20.3</b><br>Traditional housing styles and materials, such as timber and tin and masonry construction, are recognised as being important to character areas and are retained. Surrounding development respects traditional design elements while allowing for compatible innovative design responses.                                                                     |                                                                                                                                                                                                                                                                                                                           |
|                                                                                                                  | <b>L20.4</b><br>Development accords with neighbourhood plans which: <ol style="list-style-type: none"> <li>refine character aspects and overlays to better balance the demand for growth with character protection;</li> <li>identify locally responsive strategies to better integrate character buildings and precincts with anticipated growth and development.</li> </ol> |                                                                                                                                                                                                                                                                                                                           |
|                                                                                                                  | <b>L20.5</b><br>Other small shop and office buildings known as commercial character buildings: <ol style="list-style-type: none"> <li>are protected from being demolished, removed or significantly altered and</li> </ol>                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                           |

|                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                   | <p>are afforded qualified commercial use for low-impact activities to ensure their continued contribution to the local character and lifestyle of the city;</p> <p>b. fulfil a complementary role to other non-residential and centre uses in the growth areas of the city.</p>                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                |
| <p><b>SO21</b></p> <p>Brisbane residents' appreciation of character areas, heritage buildings and the city's history is increased.</p>                                                            | <p><b>L21.1</b></p> <p>Development and public domain design protects and directs attention towards local views of landmark heritage or character elements or iconic vistas identified in neighbourhood plans and overlays.</p> <hr/> <p><b>L21.2</b></p> <p>Development provides noteworthy information regarding the cultural or historic significance of a site through works such as local heritage trails and interpretive signage.</p> <hr/> <p><b>L21.3</b></p> <p>Public domain design and public art complements or interprets local history and character elements.</p> | <p><b>Complies with SO21</b></p> <p>The proposed development provides for improvement of the integrity and useability of the local heritage place, to be appreciated and utilised by Brisbane's residents.</p> |
| <p><b>SO22</b></p> <p>The cultural connections that Aboriginal people have to Brisbane are recognised, maintained and protected in accordance with the Aboriginal Cultural Heritage Act 2003.</p> | <p><b>L22.1</b></p> <p>Public domain design promotes Aboriginal and Torres Strait Islander art and culture and acknowledges the history of Traditional Owners in locations of high cultural significance.</p> <hr/> <p><b>L22.2</b></p> <p>Culturally significant sites and cultural landscapes are identified, protected and maintained.</p> <hr/> <p><b>L22.3</b></p> <p>Meeting Places of contemporary importance to the Aboriginal and Torres Strait Islander communities are protected and maintained.</p>                                                                  | <p><b>Not Applicable</b></p> <p>The site is not identified as a place of significance to Aboriginal and Torres Strait Islander communities.</p>                                                                |

### 7.2.3 Zone

As shown in **Figure 5** below, the site is located in the Community facilities zone and further identified within the CF7 Health care purposes sub-precinct. The surrounding area is also predominately located within the Community facilities zone, with a large portion of Low density residential zone, and some pockets of land within the Open space, Environmental management, and Character residential zones.



Figure 5. Zoning map (Brisbane City Plan 2014 Interactive Mapping)

Pursuant to Part 6.2.6.1(1) of the planning scheme –

*The purpose of the community facilities zone is to provide for:*

- a. *community-related uses, activities and facilities, whether publicly or privately owned, including, for example:*
  - i. *educational establishments; and*
  - ii. *hospitals; and*
  - iii. *transport and telecommunication networks; and*
  - iv. *utility installations; and*
- b. *residential uses, if all of the dwellings for the residential use, other than caretaker's accommodation, are:*
  - i. *an affordable housing component; and*
  - ii. *either on land:*
    - A. *associated with a community activity comprised of a community care centre, a place of worship or a residential care facility; or*
    - B. *owned, controlled or managed by an entity that carries out a community activity comprised of a community care centre, a place of worship or a residential care facility.*

The provisions contained in the overall outcomes of the Community facilities zone code are primarily related to built form, location and land use outcomes, and do not relate to the proposed partial demolition, relocation and reconstruction of the local heritage place. Notwithstanding, development will not prejudice the achievement of key overall outcomes sought, including the continued capacity of the site to provide community facilities.

A full assessment of the proposed development against the provisions of the Community facilities zone code is provided in **Table I** below.

Table I – Response to Community facilities zone code

| Overall Outcome                                                                                                                                                                                                                                                                                                  | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4. Development location and uses overall outcomes are:</b>                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| a. Development provides for the continued use of the land for community facilities identified as appropriate for the particular Community facilities zone precinct.                                                                                                                                              | <p><b>Complies</b></p> <p>The proposed development relates to the relocation and reconstruction of the existing built form on site. The proposed works will provide for the improvement of facilities on site and will not prejudice the use of land for community facilities.</p> <p>The land uses identified within the preliminary approval (Community care centre, Community use, Retirement facility, Residential care facility and Indoor sport and recreation) are each anticipated by the Community facilities zone (Health care purposes zone precinct). The proposed preliminary approval provides a framework for continued use of land for community facilities in line with the zone precinct. However, the proposed development does not seek to directly establish the stated land uses within the scope of this development application.</p> |
| b. Development enables community facilities to play a key role in developing and maintaining community networks, services and community health and wellbeing and contributes to the city being well served with community buildings, facilities, spaces and activities meeting the diversity of community needs. | <p><b>Complies</b></p> <p>The land uses identified within the preliminary approval (Community care centre, Community use, Retirement facility, Residential care facility and Indoor sport and recreation) are each anticipated by the Community facilities zone (Health care purposes zone precinct). The proposed preliminary approval provides a framework for continued use of land for community. However, the proposed development does not seek to directly establish the stated land uses within the scope of this development application.</p>                                                                                                                                                                                                                                                                                                       |
| c. Development provides for both privately owned community facilities and community facilities that are owned or operated by federal, state or local government.                                                                                                                                                 | <p><b>Complies</b></p> <p>The proposed development will not affect the operation of privately owned community facilities on the site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| d. Development ensures that where a use within a Community facilities zone precinct ceases and is no longer fulfilling the intended purpose of the relevant zone precinct, that it is replaced with another community facility.                                                                                  | <p><b>Not Applicable</b></p> <p>The proposed development does not involve the cessation of a Community facility.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| e. Development that limits the ongoing operation and expansion of an existing community facility or prejudices the establishment of a new community facility appropriate to the relevant zone precinct is not accommodated.                                                                                      | <p><b>Complies</b></p> <p>The land uses identified within the preliminary approval (Community care centre, Community use, Retirement facility, Residential care facility and Indoor sport and recreation) are each anticipated by the Community facilities zone (Health care purposes zone precinct).</p> <p>The proposed variation request provides a framework for future development of community facilities that is intended by the zone precinct. It is noted that this application does not directly establish the stated land uses within the scope of this development application; however, the relocation and reconstruction of the existing heritage building will provide for the improvement of facilities on site and will not prejudice the use of land for community facilities.</p>                                                         |
| f. Development in a particular zone precinct is predominantly for community facilities that are envisaged in that zone precinct, unless an appropriate adaptation of the premises for another community facility use can be demonstrated.                                                                        | <p><b>Complies</b></p> <p>The land uses identified within the preliminary approval (Community care centre, Community use, Retirement facility, Residential care facility and Indoor sport and recreation) are each anticipated by the Community facilities zone (Health care purposes zone precinct).</p> <p>It is noted that this application does not directly establish the stated land uses within the scope of this development application.</p>                                                                                                                                                                                                                                                                                                                                                                                                        |
| g. Development improves the use of existing community facilities infrastructure to ensure accessibility and multiple uses.                                                                                                                                                                                       | <p><b>Not Applicable</b></p> <p>No existing community facilities are established on site and therefore the proposed development does not directly involve improvements to established community facilities.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| h. Development for a use not anticipated in the relevant zone precinct may be accommodated where it is demonstrated that                                                                                                                                                                                         | <p><b>Not Applicable</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>the proposal is safe, well designed, integrated with the surrounding area and offers compensatory community benefits.</p>                                                                                                                                                                                                                                                                                                                                                     | <p>The land uses identified within the preliminary approval (Community care centre, Community use, Retirement facility, Residential care facility and Indoor sport and recreation) are each anticipated by the Community facilities zone (Health care purposes zone precinct).</p>                                                                                                                                                                                                                                                                                                                                                                                         |
| <p>i. Development:</p> <ul style="list-style-type: none"> <li>i. is appropriately located according to the type of proposed use;</li> <li>ii. is highly accessible and preferably integrated and co-located with complementary uses where possible;</li> <li>iii. is of a scale, height and bulk that provides a high level of amenity;</li> <li>iv. is generally consistent with the character of the area;</li> <li>v. transitions sensitively to surrounding uses.</li> </ul> | <p><b>Complies</b></p> <p>The land uses identified within the preliminary approval (Community care centre, Community use, Retirement facility, Residential care facility and Indoor sport and recreation) are each anticipated by the Community facilities zone (Health care purposes zone precinct), and are capable of being appropriately accommodated on the site subject to future development applications.</p> <p>Any future development applications will provide an assessment against components (i)-(v) of this overall outcome, as the proposed development does not directly involve the establishment of land uses under the effect of this application.</p> |
| <p>j. Development is supported by complementary uses of an appropriate scale and purpose which directly serve the employees and activities of the relevant zone precinct and do not compromise the commercial, retail or community service role and function of nearby centre activities.</p>                                                                                                                                                                                    | <p><b>Complies</b></p> <p>The proposed development does not directly involve the establishment of land uses under the effect of this application. Notwithstanding, the land uses contained within the preliminary approval component of the proposed development (Community care centre, Community use, Retirement facility, Residential care facility and Indoor sport and recreation) are each anticipated by the Community facilities zone (Health care purposes zone precinct),</p>                                                                                                                                                                                    |
| <p><b>5. Development form overall outcomes are:</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>a. Development for a major government facility or service is of a form tailored to the particular operational, functional and locational requirements of the use.</p>                                                                                                                                                                                                                                                                                                         | <p><b>Not Applicable</b></p> <p>The proposed development does not relate to a major government facility or service.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p>b. Development creates a variety of building forms, materials and facade treatments.</p>                                                                                                                                                                                                                                                                                                                                                                                      | <p><b>Complies</b></p> <p>The proposed development involves building work for the partial demolition, relocation and reconstruction of the local heritage place. The proposed reconstruction will support the replacement of damaged and hazardous materials, with a comparable appearance to the existing heritage fabric.</p>                                                                                                                                                                                                                                                                                                                                            |
| <p>c. Development manages amenity impacts (including glare, odour, light, noise, traffic, parking, servicing and hours of operation) and provides a sensitive transition between a use in the Community facilities zone and adjoining sensitive uses.</p>                                                                                                                                                                                                                        | <p><b>Not Applicable</b></p> <p>The proposed development includes a preliminary approval that contains a variation request, which identifies a number of land uses which may occur as future development. The amenity impacts of future development is subject to future development applications and is not relevant to the scope of this application.</p>                                                                                                                                                                                                                                                                                                                |
| <p>d. Development supplies infrastructure, service and utilities at a level that is commensurate with the level of service demands generated by the use.</p>                                                                                                                                                                                                                                                                                                                     | <p><b>Not Applicable</b></p> <p>The proposed development includes a preliminary approval that contains a variation request, which identifies a number of land uses which may occur as future development. The provision of services for future development is subject to future development applications and is not relevant to the scope of this application.</p>                                                                                                                                                                                                                                                                                                         |
| <p>e. Development maximises road, rail, public transport and active transport connections and accessibility between community facilities and key destinations to ensure efficient and safe movement of people and goods and a high level of accessibility for visitors, patrons and employees of the community facility use.</p>                                                                                                                                                 | <p><b>Not Applicable</b></p> <p>The proposed development includes a preliminary approval that contains a variation request, which identifies a number of land uses which may occur as future development. The accessibility of future development is subject to future development applications and is not relevant to the scope of this application.</p>                                                                                                                                                                                                                                                                                                                  |
| <p>f. Development is designed, constructed and operated to maintain the safety and security of people and property.</p>                                                                                                                                                                                                                                                                                                                                                          | <p><b>Complies</b></p> <p>The proposed development seeks to facilitate structural improvements of the local heritage place built form, and will be constructed in accordance with the <b>Construction Management Plan</b>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p>g. Development achieves a satisfactory standard of environmental performance by adopting principles of innovative, sustainable and efficient design, construction and</p>                                                                                                                                                                                                                                                                                                     | <p><b>Complies</b></p> <p>The proposed development relates to the relocation and reconstruction of the existing built form on site. The proposed works</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

|                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| operation to encourage water conservation and responsiveness to climate.                                                                                                                                                                                                                                                                  | will provide for an improved standard of construction in line with contemporary requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| h. Development for a community facility that is a major economic driver, such as a hospital, consolidates its role in facilitating growth in allied fields such as medical research and product development drawing visiting research academics and clinical professionals to the region and functioning as a major employment generator. | <b>Not Applicable</b><br>The proposed development includes a preliminary approval that contains a variation request, which identifies a number of land uses which may occur as future development. None of the identified land uses are a major economic driver comparable to a hospital.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| i. Development responds to land constraints, mitigates any adverse impacts on environmental values and natural features, and addresses other specific characteristics as identified by overlays affecting the sites or in a code applicable to the development.                                                                           | <b>Complies</b><br>The proposed development relates to the relocation and reconstruction of the existing built form on site, and will not generate any adverse hazard or environmental impacts.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| j. Development for a use other than a community facility that is provided in conjunction with a community facility use incorporates a design that allows for reasonable adaptability and expansion, where necessary, of the community facility.                                                                                           | <b>Not Applicable</b><br>The proposed development is limited to building work for the relocation, partial demolition and reconstruction of a local heritage place and does not relate to land use or built form outcomes. The preliminary approval component identifies a number of land uses which may occur as future development and each are anticipated by the Community facilities zone                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>10. Health care purposes zone precinct overall outcomes are:</b>                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| a. Development provides premises with day clinic and administrative functions that involve medical, paramedical, alternative therapies and general health care treatment for the local community.                                                                                                                                         | <b>Not Applicable</b><br>The proposed development includes a preliminary approval that contains a variation request, which identifies a number of land uses which may occur as future development. The provision of health care services such as those stated are not directly proposed within this application, but would be considered within the scope of future development applications.                                                                                                                                                                                                                                                                                                                                                                                                                |
| b. Development for purpose-built premises for residential occupation by the elderly, young or people with disabilities, such as a residential care facility or a retirement facility, together with ancillary convenience activities and allied services provided to cater for their particular needs, may be accommodated.               | <b>Complies</b><br>The proposed development includes a preliminary approval that contains a variation request, which identifies a number of land uses which may occur as future development. This includes Retirement facility and Residential care facility as purpose-built premises for residential occupation by the elderly. This development application does not directly seek to establish a Retirement facility or Residential care facility; however, it is anticipated that the future use of the site will incorporate similar uses, given the current development application over the subject site.<br>The provision of ancillary convenience activities and allied health services would be subject to future development applications and are not relevant to the scope of this application. |

## 7.2.4 Neighbourhood Plan

As shown in **Figure 6** below, the site is located in the Sandgate district neighbourhood plan area, and is not located within any further precincts or sub-precincts.



Figure 6. Sandgate district neighbourhood plan map (Brisbane City Plan 2014 Interactive Mapping)

Pursuant to Table 5.9.60.A of the planning scheme, the proposed development does not trigger assessment against the Sandgate district neighbourhood plan code. Notwithstanding, as an impact assessable development application, an assessment of the Sandgate district neighbourhood plan code has been provided as a relevant assessment benchmark.

A response to the overall outcomes of the Sandgate district neighbourhood plan code is provided in **Table J** below.

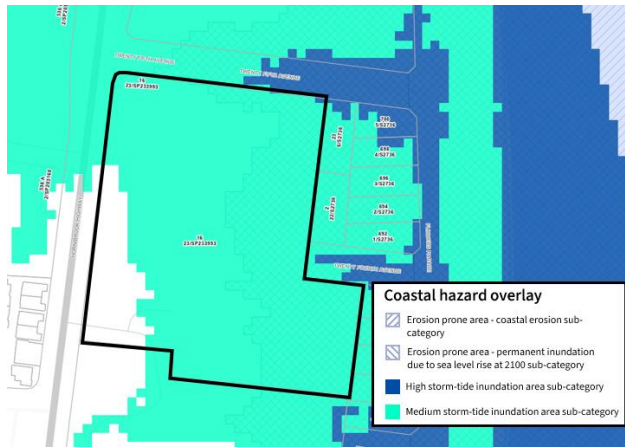
Table J – Response to Sandgate district neighbourhood plan code

| Overall Outcome                                                                                                                                                                                | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a. Heritage places that contribute to the history and identity of Sandgate district are conserved, whilst allowing for adaptive reuse where appropriate.                                       | <p><b>Complies</b></p> <p>The proposed development relates to the relocation and reconstruction of the local heritage place's built form on site. The proposed works conserve the significance and identity of the local heritage place, as demonstrated in the Heritage Impact Assessment, and will enable future adaptive reuse subject to future development applications.</p>                                                                                                      |
| b. Residential development will be predominantly low density with the character of the district continuing to reflect traditional architectural features such as 'timber and tin' housing.     | <p><b>Not Applicable</b></p> <p>The proposed variation identifies a number of land uses which may occur as future development. This is inclusive of residential uses, being Retirement facility and Residential care facility. Notwithstanding, this development application does not directly seek to establish a Retirement facility or Residential care facility.</p> <p>The density, design and character of future development is subject to future development applications.</p> |
| c. Sandgate centre is the primary centre for the district, providing employment opportunities and services for the local community, and is supported by an existing District centre in Deagon. | <p><b>Not Applicable</b></p> <p>The proposed development is located in Brighton and is not located within the Sandgate centre.</p>                                                                                                                                                                                                                                                                                                                                                     |
| d. Low impact industry uses are protected around Connaught Street contributing to the local economy and jobs.                                                                                  | <p><b>Not Applicable</b></p> <p>The proposed variation identifies a number of land uses which may occur as future development, which do not include any industrial activities.</p>                                                                                                                                                                                                                                                                                                     |

|    |                                                                                                                                                                                                                                 |                                                                                                                                                                                                           |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| e. | The environmental and Aboriginal cultural heritage values of Moreton Bay, Boondall and Tinchi Tamba Wetlands, Cabbage Tree Creek and Third, Dowse and Einbunpin lagoons are protected.                                          | <b>Complies</b><br>The proposed development will not affect the environment and Aboriginal cultural heritage of significant places in the neighbourhood plan area.                                        |
| f. | Sandgate foreshore and Shorncliffe Pier continue to provide recreational uses that attract tourism to the Sandgate district.                                                                                                    | <b>Not Applicable</b><br>The proposed development is located in Brighton and is not located on the Sandgate foreshore or Shorncliffe Pier.                                                                |
| g. | Deagon racecourse provides for a limited range of non-residential uses to support the function of the racecourse as a Major sport, recreation and entertainment facility, while maintaining the primacy of the Sandgate centre. | <b>Not Applicable</b><br>The proposed development is located in Brighton and is not located on the Deagon racecourse.                                                                                     |
| h. | Development does not exceed building heights specified in the neighbourhood plan, to maintain the prevailing character of the area.                                                                                             | <b>Not Applicable</b><br>The proposed development does not provide for the establishment of new built form. Further, the site is not subject to a specified building height under the neighbourhood plan. |

### 7.2.5 Overlays

### Table K – Summary of Overlays



### Coastal hazard overlay

The site is mapped within the following sub-categories of the Coastal hazard overlay:

- Erosion prone area - coastal erosion sub-category
- Erosion prone area - permanent inundation due to sea level rise at 2100 sub-category
- High storm-tide inundation area sub-category
- Medium storm-tide inundation area sub-category

Pursuant to Table 5.10.6 of the planning scheme, the proposed development does not trigger assessment against the Coastal hazard overlay code and remains accepted development.

Specifically, the proposed building work does not involve an increase in Gross floor area and complies with all acceptable outcomes in section B of the Coastal hazard overlay code (achieves compliant minimum flood planning level of 3.6m)

As such, no further assessment is required.

Nil

### Community purposes network overlay

The Community purposes network overlay seeks to facilitate the completion of the Community purposes network through the provision of existing and planned infrastructure for the parks network and land for the community facilities network in the Local government infrastructure plan. The site is not mapped within the overlay.

As such, the Community purposes network overlay code is not a relevant assessment benchmark, and no further assessment is required.



### Critical infrastructure and movement network overlay

The site is mapped within the Critical infrastructure and movement planning area sub-category of the Critical infrastructure and movement network overlay.

Pursuant to Table 5.10.8 of the planning scheme, the proposed development does not trigger assessment against the Critical infrastructure and movement network overlay code. As such, no further assessment is required.



### Heritage overlay

The site is mapped within the following sub-categories of the Heritage overlay:

- Local heritage place sub-category
- Area adjoining heritage sub-category

The proposed development seeks to undertake the partial demolition, relocation and reconstruction of the local heritage place on-site, and vary the Heritage overlay mapping to reflect the relocated local heritage place.

Pursuant to Table 5.10.12 of the planning scheme, the proposed development is assessable against the Heritage overlay code.

A full response is provided in the **Heritage Impact Assessment**.



#### Potential and actual acid sulfate soils overlay

The site is mapped within the following sub-categories of the Potential and actual acid sulfate soils overlay:

- Potential and actual acid sulfate soils sub-category
- Land at or below 5m AHD sub-category

Pursuant to Table 5.10.15 of the planning scheme, the proposed development for building works does not trigger assessment against the Potential and actual acid sulfate soils overlay code. As such, no further assessment is required.

It is acknowledged that the proposed Architectural Plans display filling greater than 0.5m in the Potential and actual acid sulfate soils overlay. Approval for these works are not sought as part of the proposed development and will be sought under a separate development application subject to detailed design.



#### Road hierarchy overlay

The site has three road frontages, which are mapped within the following sub-categories of the Road hierarchy overlay:

- Suburban road: Hornibrook Highway
- Neighbourhood road: Twenty-Fourth Avenue and Twenty-Fifth Avenue

Pursuant to Table 5.10.18 of the planning scheme, the proposed development does not trigger assessment against the Road hierarchy overlay code. As such, no further assessment is required.



#### Streetscape hierarchy overlay

The site has three road frontages, each of which are mapped within the Neighbourhood street major sub-category of the Streetscape hierarchy overlay.

Pursuant to Table 5.10.20 of the planning scheme, the proposed development does not trigger assessment against the Streetscape hierarchy overlay code. As such, no further assessment is required.

### 7.3 Temporary Local Planning Instrument/s

The site is not identified as being subject to any TLPs.

### 7.4 Planning Scheme Policies

The relevant planning scheme policies have been addressed as part of the response to the assessment benchmarks.

### 7.5 Local Government Infrastructure Plan

The site is identified in the Priority Infrastructure Area (PIA) and if has frontage to the Hornibrook Highway, which is identified as an existing trunk road. The site is not subject to any identified future trunk infrastructure.

### 7.6 Long Term Infrastructure Plan

The site is not subject to any LTIP items.

### 7.7 Infrastructure charges

The proposed development will not be subject to infrastructure charges.

## 8. Other Relevant Matters

### 8.1 Introduction

Pursuant to Section 45(5)(b) of the Planning Act, an impact assessable development application may be carried out against any other relevant matters, other than a person's personal circumstance, financial or otherwise.

This section identifies multiple relevant matters which are presented as relevant to Council's consideration of the proposed development, and within a balanced assessment framework, weigh in favour of approval.

### 8.2 Lack of adverse impacts

The proposed development will not result in the incurrence of any adverse impacts on surrounding residential properties, infrastructure network or environmental matters.

The proposed development involves the partial demolition, relocation and reconstruction of a local heritage place, and includes a preliminary approval which will vary the extent of the Heritage overlay sub-categories on the site to reflect the repositioned local heritage place curtilage.

Critically, whilst the preliminary approval identifies future land uses which may be carried out on the site, each of these are anticipated by the Community facilities zone (Health care purposes zone precinct). The proposed development does not directly establish the stated land uses, which will require future development applications that include assessment of all relevant assessment benchmarks.

The proposed development will not introduce any new land use, built form or infrastructure demand onto the site, nor will it generate any adverse amenity impacts for adjoining properties.

### 8.3 Increased appreciation of heritage place

The proposed development will result in a significantly improved appreciation and presence of the former Sandgate RAAF Training Base local heritage place. The heritage buildings are currently located in an isolated position within the south-eastern corner of the site, are largely hidden from public view and have remained vacant and unused for an extended period and are currently in a dilapidated state. The proposal will relocate the buildings to a prominent position with frontage to Twenty-Fourth Avenue, substantially increasing their visibility from the public realm, while also revitalising their built form and materials, therefore reinforcing their contribution to the history and identity of the locality.

The proposed development will enable the future adaptive reuse of the heritage place as part of an integrated development on the site.

## 9. Conclusion

In summary, this report, and the supporting material, has provided a comprehensive assessment of the proposed development in accordance with requirements and framework of the Planning Act and applicable common law, and confirms that the proposed development satisfies all relevant matters of assessment and is able to be approved.

On a balanced assessment, it is considered the facts and circumstances outlined within this report and the supporting material are overall favourable to the approval of the proposed development. As such, it is recommended the proposed development be approved, subject to reasonable and relevant conditions.

It is expected that reasonable and relevant conditions will be imposed on the development approval in accordance with section 65 of the Planning Act.



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