



ABN: 232 5100 6120
Level 1, 6 Overend Street,
East Brisbane QLD 4169
info@vmstownplanning.com.au
www.vmstownplanning.com.au

4 June 2026

ATTENTION: CHIEF EXECUTIVE OFFICER

C/- The Assessment Manager (Dominic Hudson)
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

Email: DSPlanningSupport@brisbane.qld.gov.au
CC: Dominic.Hudson@brisbane.qld.gov.au

Dear Dominic,

RE: INFORMATION REQUEST RESPONSE FOR APPLICATION NUMBER A006593214

We refer to the Brisbane City Council's information request dated 4 March 2025 in relation to the application specified in the subject line above. The following is a response to the information requested in accordance with s13 of the *Development Assessment Rules*.

In response to the information request from Council, please find attached the following documentation:

- **Appendix A:** Architectural Plans, prepared by DZ Architects Pty Ltd;
- **Appendix B:** Economic Need and Impact Assessment, prepared by Ethos Urban Pty Ltd;
- **Appendix C:** Traffic Engineering and Waste Management Letter, prepared by Modus Pty Ltd;
- **Appendix D:** Civil Engineering Response, prepared by Ensilon Pty Ltd; and
- **Appendix E:** Landscape Concept Plan, prepared by LAUDink Pty Ltd.

Information Request Item:

Land Use and Local Need

1. *Overall outcome 4.i of the Low density residential zone code requires that development for a Small-scale non-residential use serves local residents' day-to-day needs and does not undermine the viability of a nearby centre. Further, Overall outcomes 2.d and 2.e of the Small-scale non-residential uses code require that the development serves a demonstratable need of the local community and fulfills a role distinct from uses in centres and is not in close proximity to centres.*

Finally, Performance outcomes PO1 and PO2 of the Small-scale non-residential uses code require that the development is not located on a neighbourhood road, does not introduce non-local traffic to a minor road, does not cause incremental extension of an existing centre and is not in a catchment serviced by an existing centre.

The materials submitted to date have not successfully demonstrated that the proposal achieves the above City Plan 2014 provisions and further information is required, including the provision of an Economic Needs Assessment to demonstrate a need for the proposal and address how the proposal achieves the following:



- a. *How the proposed land uses, future tenants and their specific operations will serve local resident's day-to-day needs.*
- b. *How the proposal will not undermine the viability of adjoining and nearby centres or incrementally extend the existing centre. Focus must be placed on the potential for impacts to adjoining and nearby Centre zoned land to the east and west, including along Gympie Road. The following must be considered:*
 - I. *Existing supply of Shop and Office space within nearby Centres (including any recent development approvals);*
 - II. *Office and Shop vacancy or take-up rates in the Centres;*
 - III. *Economic benefits or costs the investment and employment opportunities would have on the locality;*
 - IV. *An outline of the existing functions of the adjoining and nearby centres, any speciality focus (if applicable) and other centre dynamics that should be considered;*
 - V. *Details on how the proposal fulfills a role distinct from uses offered in the Centre;*
 - VI. *Details as to why the particular use cannot be provided in the Centre.*
- c. *How the proposal will not introduce non-local traffic into a neighbourhood road or how it will not adversely impact on local amenity and safety.*

Applicant Response

Please refer to the Economic Need and Impact Assessment prepared by Ethos Urban Pty Ltd, included in Appendix B.

Parking, Servicing, Refuse Collection and Vehicle Access

2. *The proposed driveway location results in the proposed removal of an existing mature street tree, which is not supported. The proposed crossover should be relocated to the south to be in generally the same location as the existing crossover to avoid the removal of the existing mature street tree. This would also move the driveway away from the residential interface, reducing the potential for adverse amenity impacts.*

Applicant Response

As detailed on the Architectural Plans prepared by DZ Architects Pty Ltd, included in Appendix A the existing street tree is proposed to be removed to facilitate a new crossover/driveway location to the overall development. The location of the new crossover/driveway ensures connectivity of the new extension of the centre, with the existing building as well as providing a buffer to the surrounding residential dwellings.

As detailed on the Landscape Concept Plan prepared by LAUDink Pty Ltd, included in Appendix E additional landscaping, including a new mature shade tree is proposed within the verge as well as buffer/screening shrubs along the new crossover/driveway to mitigate any amenity concerns with the adjoining residential dwelling to the north.

Please refer to the Landscape Concept Plan prepared by LAUDink Pty Ltd, included in Appendix E for further details.

3. *Demonstrate through the provision of a reviewed RPEQ prepared traffic report that the vehicle access location (repositioned as per the above) meets the relevant criteria regarding distance to electric pole and street tree of BSD-2022. Provide dimensioned plans clearly showing the location of the existing street trees and electrical pole, and clearance to the proposed crossover.*

Applicant Response

Please refer to the Traffic Engineering and Waste Management Letter prepared by Modus Pty Ltd, included in Appendix C.

4. *The traffic report proposes a total 40 parking spaces, including both existing and additional spaces. Although on-street parking should not generally be counted as parking spaces for the proposed development use, the current arrangement utilizes parking spaces which are located partially within the road reserve and site. The continuing use of the existing spaces can be supported, however any new or altered parking and servicing bays are to be located within the site. In addition, the plans do not show 40 spaces, and all existing and proposed spaces must be reflected on the plans.*



- a. *Revise the traffic report and proposed plans to demonstrate the formal parking spaces at the rear of property, showing all parking spaces, and ensure the car parking layout is in accordance with the requirements of TAPS PSP (other than retained spaces partially within the street).*
- b. *Amend the proposal plans so that any parking spaces which are partially within the road reserve are restricted to existing ones. New and altered parking spaces or servicing bays partially within the road reserve are unlikely to be supported.*
- c. *The dimensions shown on the plans for small vehicles are inconsistent and contradictory. Therefore, revise the dimensions and labelling of the car parking on the proposed plans.*

Applicant Response

Please refer to the Traffic Engineering and Waste Management Letter prepared by Modus Pty Ltd, included in Appendix C.

5. *The proposed servicing arrangements and swept path analysis outlined in the traffic report prepared by Modus do not comply with PO19 of the TAPS code. The traffic report mentions that regular refuse collection will occur outside business hours, with RCV manoeuvring and traversing numerous designated parking bays. The report also proposes an external SRV service bay within the road reserve for regular servicing of the proposed uses. Both of these outcomes are not supported.*
 - a. *Councils Waste and Resource Recovery Service Team is unable to commit to any specific times for refuse collection and will not service refuse outside hours. Revise the proposal to demonstrate RCV servicing can be achieved onsite in accordance with TAPS PSP requirements and the Refuse PSP requirements, including without impact to any proposed designated parking bays. Alternatively provide a letter from a private contractor outlining they can/will service the site refuse collection outside business hours.*
 - b. *Removed the proposed external service bay from the plans. Demonstrate SRV servicing can be achieved onsite in accordance with TAPS PSP, demonstrate manoeuvring and a dedicated service bay on site.*

Applicant Response

Please refer to the Traffic Engineering and Waste Management Letter prepared by Modus Pty Ltd, included in Appendix C.

6. *The proposal plans show that the aisle trafficked by the RCV is less than 6.5m wide. Additionally, a review of the 'Modus- Traffic Engineering Report' has identified that the 'BCC RCV Swept Path Assessment' has not been RPEQ certified. Demonstrate the following:*
 - a. *Provide amended development plans which clearly demonstrates the aisle trafficked by the RCV is a minimum of 6.5m wide.*
 - b. *Provide a revised swept path analysis for a 10.24m Rear Loading RCV (As per BSD-3008-2) as specified in Table 3 of the Refuse PSP demonstrating safe and efficient on-site servicing which has been RPEQ certified.*
 - c. *Alternatively provide a letter from a private contractor outlining they can/will service the site refuse collection outside business hours and submit a swept path analysis for the private RCV.*

Applicant Response

Please refer to the Traffic Engineering and Waste Management Letter prepared by Modus Pty Ltd, included in Appendix C.

Pedestrian Thoroughfare and Access

7. *Provide a revised development layout and streetscape outcome that integrates the proposed extension with the Wilmah Street streetscape to ensure the comfort and safety of pedestrians and cyclists. Given the proposal seeks to extend Centre activity uses further to the north, it is expected that streetscape upgrades to a Centre street minor standard would be provided to the Wilmah Street verge. The proposal is also to meet Council standards for pedestrian safety and*



include provision for shade trees. Refer to the Infrastructure design planning scheme policy (Chapter 3.7 Streetscape hierarchy) and relevant Brisbane Standard Drawings.

Applicant Response

Please refer to the Architectural Plans prepared by DZ Architects Pty Ltd, included in Appendix A and the Landscape Concept Plan prepared by LAUDink Pty Ltd, included in Appendix E for further details.

8. *The proposal does not appear to align with the most recent approval on the site A005375395. The proposed plans appear to show a seating area obstructing the pedestrian access/thoroughfare route at corner of Robinson Rd and Wilmah St. Provide amended plans clearly demonstrating a 1.8m wide clear path for pedestrians which is required to be maintained at all times, consistent with the existing approval.*

Applicant Response

As detailed on the Architectural Plans prepared by DZ Architects Pty Ltd, included in Appendix A the pedestrian access/thoroughfare route at corner of Robinson Rd and Wilmah St has been clearly demonstrating a 1.8m wide clear path for pedestrians.

9. *There is currently no footpath within the road reserve on large sections of the Wilmah Street and Robinson Road frontages due to the location of parking spaces and a pathway internal to the site is utilized for public thoroughfare, although there is no public thoroughfare easement over this path. The proposal seeks to extend the pathway located internal to the site (at the corner of Tenancy 9) and a public thoroughfare easement should be provided over the whole path (including the existing) within the site boundary.*

Applicant Response

As detailed on the Architectural Plans prepared by DZ Architects Pty Ltd, included in Appendix A the car parking spaces on Wilmah Street and Robinson Road frontages are existing car parks and crucial to the existing centre and proposed extension as part of this development. The footpath within the premises is also existing and provides thoroughfare for public use. Given this footpath within the front of the premises is already utilised as a thoroughfare for public use, an easement is not considered to be required and is not proposed in this instance.

10. *The Aspley district neighbourhood plan code requires a pedestrian route through the site (Figure c and PO9/AO9) to connect the shops fronting Wilmah Street and the adjoining supermarket to the east. Provide amended plans showing how this is to be delivered in order to improve the links between the existing centre and the adjoining supermarket.*

Applicant Response

Notwithstanding the apparitions of the Aspley district neighbourhood plan code requirements, there is no safe or logical pedestrian access through the premises to the adjoining supermarket. The only safe and permeable access point would be along the frontage of the premises onto the footpath on the Robinson Road verge to the front of the supermarket. As such no pedestrian route through the site is proposed or warranted in this instance.

11. *The proposed pedestrian path shown within the internal driveway is unsafe due to conflicts with vehicular movement. The pedestrian path is within aisle width of the driveway. A revised traffic report certified by an RPEQ is required to address this whilst revised plans are also required demonstrating a safe and efficient pedestrian path from the parking area at the rear to frontage. There is opportunity to align this pathway with the pedestrian route prescribed by Figure c of the Aspley district neighbourhood plan code.*

Applicant Response

Please refer to the Traffic Engineering and Waste Management Letter, prepared by Modus Pty Ltd, included in Appendix C.

Stormwater Management:

12. *It is noted the proposed lawful point of discharge (LPD) for the site is the existing stormwater line within Helena Street. It is acknowledged a survey of the existing site has been undertaken and attempts have been made to locate the existing manhole (assumed to be covered over with asphalt pavement) within Helena St to confirm the invert levels of the existing infrastructure.*



However, given the invert level of the existing infrastructure is key in determining if the lawful point of discharge can be obtained (i.e. it ensures stormwater can gravity feed from the site to the LPD), confirmation of the existing infrastructure levels must be provided as LPD cannot be left to operational works design stage as proposed.

- a. Contact Council Program Planning and Integration Team via the Council Call Centre to request the manhole is located/exposed to permit survey and confirm/demonstrate the level of the existing infrastructure/LPD.
- b. The proposed connection across the verge appears to clash/impact an existing street tree on the neighbouring site frontage. Revise the stormwater management Plan (SWMP) to remove the clash/impact and ensure the street tree on the neighbouring frontage is retained/protected.

Applicant Response

Please refer to the Civil Engineering Response prepared by Ensilon Pty Ltd, included in Appendix D.

13. The proposed free standing detention tank with a charged system connection is not consistent with the Stormwater code and Infrastructure design code section 7.5. The position any of detention is required to be located underground, and demonstrated to be connected to a LPD, with no charged system/lines. Provide a revised SWMP demonstrating this is the case.

Applicant Response

Please refer to the Civil Engineering Response prepared by Ensilon Pty Ltd, included in Appendix D.

14. The proposal indicates the driveway grades down within/into the site and the rear carpark area is lower than the street level. There is concern this arrangement creates a sag within the site, increases the risk of the stormwater system surcharging/creating adverse impact to the property to the north and will not allow the stormwater to gravity feed to the LPD.
 - a. Its highly recommended it is investigated whether fill can placed (in accordance with the Filling and excavation code) at the rear to lift the rear of the drainage system providing more capacity and reducing the susceptibility to surcharging to the North, as well as ensuring the stormwater system can gravity feed to the proposed LPD. Or demonstrate how these issues are addressed.
 - b. Provide a longitudinal section of the stormwater drainage proposed, demonstrating capacity (show the hydraulic grade line on the longitudinal section) and showing levels of the infrastructure demonstrating the system will gravity feed to the LPD.
 - c. The extensive use of the Aco type drainage, with no other inlet types is not supported as proposed. Should they be left unmaintained, blockages can occur resulting in the grates becoming dislodged and creating trip/fall issues. Conventional type flush grates in paved areas and side inlet type gullies along the northern boundary along with small kerb upstand should be investigated for use to maximise capture/capacity of LPD system.
 - d. Demonstrate if blockage of the stormwater system occurs no adverse impact due to surcharging would occur to adjoining properties.

Applicant Response

Please refer to the Civil Engineering Response prepared by Ensilon Pty Ltd, included in Appendix D.

On-site landscaping

15. Deep planting must be provided within the property boundaries (not the road reserve as currently shown) and is recommended along the site frontage to provide an improved response at the streetscape interface to better meet PO56 of the Centre or mixed use code and PO9/AO9 of the Aspley district neighbourhood plan code. Deep planting and landscaping along the northern residential interface is also recommended to minimise potential impacts on adjoining residents and to meet PO9/AO9 of the Aspley district neighbourhood plan code.
 - a. Provide a min 10% of the site as deep planting including at least one area along the site frontage and along the residential interface on the northern side boundary.



- b. *Provide a min 1.5m wide garden bed containing shade canopy trees and buffer planting along the boundaries of the driveway and parking area to reduce the impacts of heat and glare from the proposed car park to comply with AO57.1 to AO57.4 of the Centre or mixed use code.*

Applicant Response

Please refer to the Landscape Concept Plan prepared by LAUDink Pty Ltd, included in Appendix E.

Conclusion

On behalf of the Applicant, Samios Aspley Investments Pty Ltd, VMS Town Planning & Development Consultants Pty Ltd has provided all of the information requested by Council. Council should now continue the assessment of the proposed development as sufficient information has been provided addressing the matters raised in the information request.

Should you require any further assistance in relation to this matter, please contact Vass Stammes of VMS Town Planning & Development Consultants Pty Ltd via email at vass@vmstownplanning.com.au or by phone on 0431 499 499.

Kind Regards,

VMS Town Planning & Development Consultants Pty Ltd

vstammes

Vass Stammes
Director

