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Assessment Manager
Development Services
Planning Services South
Via Email: beau.morris@brisbane.qld.gov.au

Attention: Beau Morris

Dear Beau,

RE: RESPONSE TO SUBMISSIONS – DEVELOPMENT APPLICATION (A006836035) FOR MATERIAL CHANGE OF USE FOR MULTIPLE DWELLING (7 SPECIAL DISABILITY ACCOMMODATION UNITS), 1 SHORT TERM ACCOMMODATION (OVERNIGHT ONSITE ACCOMMODATION) AND HEALTH CARE SERVICE (CONSULTING ROOM)

We refer to the development application over the abovementioned property and, in particular, the properly made submissions which were lodged to Council during the Public Notification period. We have reviewed the submissions and have provided the following comments in response to the issues raised in the submissions.

Brisbane City Council received nine (9) properly made submissions during the public notification period of development application, of which all were opposed to the development. All submissions are attached to this document, and their respective issues are summarised in the table below.

We have reviewed the submissions and are of the opinion that none of the issues raised by the submitters identify any matter that has not already been considered and addressed either in the original DA submission or the response to information request letter received from Council. As a result, the proposed development does not raise any matters that would justify refusal of the proposal as currently demonstrated. We provide the following comments in support of this statement.

1.0 Response to properly made submissions

A number of recurring themes emerged from the properly made submissions received as part of the Public Notification process. These have been summarised below and we have provided a response to all matters outlined in these properly made submissions.

In our assessment, it has been identified that inconsistencies arise between the relevant and applicable assessment benchmarks. The assessment has also established the hierarchy of those benchmarks and the manner in which they are to be applied when considering various aspects of the proposed development. Notwithstanding this, Council has requested further information in relation to matters including building height, building separation, height transition and setbacks.

It is relevant to note that none of the submissions received in response to the application raised concerns regarding the proposed building height, building separation, height transition or setbacks.



These matters were instead raised by Council through its further information request. This is particularly relevant given that no submissions were received from adjoining landowners, indicating that the matters identified by Council are not matters of concern to the immediately surrounding community. On this basis, the absence of submitter concern suggests that the proposed development is generally consistent with community expectations for the locality, whereas Council's position appears to place disproportionate weight on matters that have not been identified as adverse impacts by local residents.

It is also important to recognise that land to the north of the subject site is included within the Medium density residential zone, where a higher intensity urban form is anticipated to contribute to the evolving character and future urban fabric of the locality. Development forms such as dual occupancies and multiple dwellings are expressly contemplated within this zone and, as a consequence, a greater level of residential intensity, including increased local traffic movements, is reasonably expected.

In this context, Player Street has been deliberately established by Brisbane City Council with a 25 metre wide road reserve, reflecting its intended function in accommodating access and movement associated with the higher density residential environment. The design and width of the road reserve provide capacity to support the planned urban intensification of the area and assist in distributing traffic movements generated by development within the locality.

This response is to enable natural justice through the applicant's right of reply, to the submissions made objecting to the proposed development.



Issues Raised	Details of issue	Response to Issue
1. Traffic, access, road safety and parking	<ol style="list-style-type: none"> 1. Increased traffic generation from the proposed uses. 2. Existing congestion on Kessels Road, Player Street, Pickworth Street, Nagle Street and surrounding streets. 3. Impacts on the local roundabout and peak-hour traffic conditions. 4. Safety concerns with site access, vehicle manoeuvring and turning movements. 5. Increased risk of traffic conflicts, accidents and pedestrian safety impacts. 6. Insufficient on-site parking and potential parking overspill into nearby residential streets. 7. Construction traffic worsening existing traffic and parking conditions. 	Refer to Section 1.1
2. Short-term accommodation	<ol style="list-style-type: none"> 1. Introduction of transient occupants/visitors into a residential area. 2. Commercialised style Short-term Accommodation. 3. Potential for theft, harassment, intimidation and unlawful behaviour. 4. Limited accountability of short-term occupants to the local community. 	Refer to Section 1.2
3. Community safety and operational impacts, neighbourhood amenity	<ol style="list-style-type: none"> 1. Operational plans, onsite supervision and staffing outside business hours. 2. Measures to prevent anti-social behaviour, noise disturbances, or loitering. 3. Operational conflicts between residential, short-term accommodation and health care service uses. 4. High turnover of occupants and visitors compared to standard residential uses. 	Refer to Sections 1.3
4. Built form, scale and site suitability	<ol style="list-style-type: none"> 1. Long and narrow block can't fulfill the needs of building design. 2. Long and narrow site configuration affecting design, access, manoeuvring and servicing. 3. Subject site inadequate for the proposed development. 	Refer to Section 1.4
5. Local character and compatibility	<ol style="list-style-type: none"> 1. Incompatibility with the established residential character of the area. 2. Mix of uses considered an excessive intensification of the site. 3. Built form out of character with existing streetscape 4. The scale of the use combined with Short-term accommodation use will undermine the intended residential character. 	Refer to Section 1.5



Issues Raised	Details of issue	Response to Issue
6. Infrastructure, servicing and cumulative impacts	1. Cumulative impacts on local infrastructure – traffic, waste collection and service access.	Refer to Sections 1.6

1.1 Issue 1: Traffic, access, road safety and parking

Applicants Response:

Concerns were raised by submitters regarding increased traffic volumes, peak hour traffic conditions and congestion on surrounding roads. A detailed assessment of traffic impacts was submitted in support of the development application at application stage.

The City Plan does not have a specific land use for Special Disability Accommodation. The proposed development although defined as Multiple dwelling land use by the Brisbane City Plan, is specifically designed and intended to be used as Special Disability Accommodation (SDA).

The traffic report further clarifies that SDA use differs significantly from Multiple dwelling (units) development as residents of SDA are generally less car-dependent with private vehicle ownership expected to be low to negligible. As such, the SDA which is the dominant use of this mixed use development, will not generate the same level of traffic volumes as expected with a multiple dwelling development.

The traffic report provides assessment for traffic generation associated with the proposed development. As confirmed by the traffic report, the anticipated increase in traffic associated with the proposed development is modest, equating to approximately one vehicle movement, either entering or exiting the site, every four (4) minutes during peak periods (15 vehicle per hour). Such a level of traffic generation is not of a scale that would reasonably be expected to give rise to adverse safety, capacity or operational impacts on the surrounding road network.

It is further noted that the development does not constitute a major traffic-generating development, as it does not exceed Council's nominated threshold of 25 vehicle trips per hour. On this basis, the additional traffic generated by the proposal is properly characterised as minor and would have a negligible effect on the external road network and nearby intersection operations. Accordingly, any submission grounds alleging unacceptable traffic impacts, are therefore not supported by the assessed traffic generation of the development.

Safety Concerns were raised regarding site access, vehicle manoeuvring and turning movements. Access to the proposed development is obtained from Pickworth Street, which is identified as a minor road under Council's planning scheme. The proposed crossover has been designed to accommodate both passenger vehicles and service vehicles, as demonstrated in the swept path and access arrangements contained in the submitted traffic report.

The nominated access location from Pickworth Street represents the most appropriate access outcome. In particular, the driveway has been sited to maximise its separation from the Pickworth Street / Player Street roundabout, thereby reducing potential conflict with traffic movements associated with that intersection.

It is acknowledged that, because of maximising this offset, sight lines between pedestrians on Player Street and vehicles exiting the site are constrained in some respects. However, this matter can be appropriately managed through targeted and practical mitigation measures. These include the



provision of convex mirrors to improve intervisibility between approaching pedestrians and exiting motorists, together with “Stop” and “Give Way to Pedestrians” signage and a speed hump to reinforce low-speed vehicle movements and increase driver awareness.

On this basis, the proposed access arrangement is considered suitable and capable of operating safely, subject to the implementation of the recommended mitigation measures. Accordingly, any submission concerns regarding site access and access safety can be appropriately addressed through design treatment and do not warrant refusal of the development application.

Concerns were also raised with respect to the insufficient number of onsite car parking spaces and potential parking overspill into nearby streets.

When applying the car parking rates prescribed by Council’s TAPS PSP, the development would generate a theoretical parking requirement of 26 spaces, which is greater than the 14 spaces proposed on site. The proposed parking allocates 8 spaces to service the SDA/OOA accommodation component, to be shared between residents, staff and visitors and 6 spaces to service the consulting rooms. The proposed parking supply also includes 1 person with disability parking

Council’s Transport, Access, Parking and Servicing Planning Scheme Policy (TAPS PSP) do not prescribe a specific parking rate for SDA. While the development has been assessed against the multiple dwelling rate for the purpose of establishing the required car parking supply, the proposal is purpose built for SDA (High Physical Support and Fully Accessible participants) and is not readily comparable to a conventional multiple dwelling development.

The proposed consulting rooms are dedicated to allied health services and will operate on an appointment-based model. As appointments will be scheduled and managed, it is unlikely that all practitioners, support staff, patients and visitors will be on-site at the same time. This operational arrangement is expected to distribute parking demand throughout the day and reduce the likelihood of a concentrated peak parking demand.

The site is also well located with respect to public transport, including the Garden City Mt Gravatt Station, and is within convenient access of nearby community services, shops and facilities within the Upper Mount Gravatt Principal Centre. These locational attributes reduce reliance on private vehicle travel and support a lower on-site parking demand.

Concerns were raised regarding construction traffic worsening existing traffic and parking conditions. Construction traffic will be managed through a construction traffic management plan provided as a condition of the development permit.



1.2 Issue 2: Short term accommodation

Applicants Response:

Concerns were raised regarding Introduction of transient occupants into a residential area, Reduced community safety, Potential for theft, harassment, intimidation and unlawful behaviour associated with the Short term accommodation use. Further, concerns were raised with respect to introducing commercialised style hotel (Short-term Accommodation) use into a residential corridor.

The development incorporates Onsite Overnight Accommodation (OOA) facility as required by the NDIS Act 2013, which is identified under the City Plan as Short-term Accommodation. We highlight, only one unit is provided for Short-term Accommodation use and utilised as OOA, aimed to cater for residents of Special Disability Accommodation occupying the multiple dwelling.

The proposed Short-term Accommodation is not a commercialised style accommodation and functions as Onsite Overnight Accommodation (OOA) for support and care workers providing services for the special disability residents that occupy the multiple dwelling. Consequently, the Short-term Accommodation use does not result in introduction of transient occupants nor does it impact on community safety as it is utilised by support and care workers attending to the special disability residents. The Short-term accommodation use is not a typical short-term accommodation use or similar to temporary accommodation like Air BnB. It is purely used to support the special disability accommodation and their residents that occupy the seven units.

With respect to matters raised regarding Unlawful behaviour, potential for theft, harassment and intimidation, these are not matters that can reasonably be attributed to the proposed Short-term Accommodation use and more so given that the Short-term accommodation use is aimed at providing OOA for support and care workers providing support and services for the special disability residents of the multiple dwelling. . Such behaviour may occur in any (residential or commercial) context and is not inherently more likely to arise as a consequence of this particular use. Accordingly, it should not be afforded any weight as a relevant planning ground.

1.3 Issue 3: Community safety and operational impacts, neighbourhood amenity

Applicant's Response

Concerns were raised regarding the Operational plans of the combined uses to ensure safety of both residents and surrounding community and to protect neighbourhood amenity. Further, Concerns were raised regarding high turnover of occupants and visitors compared to standard residential uses, on-site supervision and staffing, particularly outside standard business hours.

Extended hours are not proposed and the health care service will function as consulting rooms and will be operating under standard business hours of 9am to 4pm on weekdays. The proposed health care service is not intended to operate similar to the scale of other health care services given its purpose as consulting rooms.

The proposed consulting rooms are intended to operate with all appointments being scheduled and managed. It is highly unlikely that the operator and their assistant will be on-site simultaneously with patients and visitors arriving at the same time. This significantly reduces the likelihood of high turnover of patrons.

As discussed earlier, short term accommodation will be used as OOA to accommodate for care and support workers for special disability accommodation and only one small sized unit (44m²) is



allocated for this purpose and will not result in a high volume of patrons occupying this unit given only one person can occupy the OOA at any given time. The proposed multiple dwelling will provide housing for residents requiring special disability accommodation. The proposed units will cater for individuals with high physical support requirements and support individuals, living with extreme functional impairment and high care support needs. Residents of SDA units are generally less car-dependent with private vehicle ownership expected to be low to negligible which further minimises high turnover of occupants and visitors.

As such, the proposed uses are not capable of consisting a high volume of turnover impacting on safety of both residents and surrounding community as well as neighbourhood amenity. In addition, the City Plan does not require the provision of operational plans for these uses. The proposed uses are anticipated by the City Plan and compliance with the respective codes has been demonstrated and provided as part of the development application process.

1.4 Issue 4: Built form, scale and site suitability

Applicants Response

Concerns were raised regarding site characteristics with the site having a long and narrow site configuration with extensive frontage to a high-speed arterial road affecting design, access, manoeuvring and servicing.

Only a minor portion of the site has frontage to Kessels Road, which is identified as an arterial road. Vehicular access is proposed from Pickworth Street and has been deliberately located in this position to avoid direct access from Kessels Road and to ensure safe and efficient site access. This arrangement appropriately manages the interface with the arterial road network and minimises any potential traffic safety or operational impacts associated with site access. Furthermore, the nature of the subject lot does not restrict safe access to the site. Adequate onsite manoeuvring and parking provision has been provided and discussed in section 1.1.

Concerns were raised regarding the long and narrow nature of the block being unable to fulfill the needs of the building design. The proposed building has been designed in response to site constraints. The submitted architectural plans show that the development has adopted a linear building form that follows the alignment of the site and appropriately distributes the built form along the Player Street frontage. This design approach is a direct response to the elongated site configuration and enables the development to maintain a functional internal layout while presenting an ordered and legible built form to the street. The proposed plans demonstrate that the development accommodates the proposed residential apartments intended for Special Disability Accommodation (SDA), Onsite Overnight Accommodation for support and care workers providing services to residents occupying SDA, lift and stairs, service areas, car parking, vehicle access and landscaping within the site boundaries in a coordinated manner. The building has provided adequate setbacks to the neighbouring dwelling and a separation distance of approximately 4.5 meters is achieved between buildings.

The plans illustrate 14 car parking spaces at ground level, together with a reversing bay, services, bin storage, lobby areas, pedestrian entries and areas of landscaping/deep planting. This demonstrates that the site is capable of accommodating the functional requirements of the development, notwithstanding its narrow configuration.



The upper levels also demonstrate that the site is capable of supporting a practical and functional building design. The first, second and third floor plans show that the residential units and common areas are arranged efficiently within the building footprint, with SDA units provided with internal living spaces, bedrooms, bathrooms, balconies and access to circulation areas. The proposal includes recreation and private open space areas, which are all accommodated within the site.

The design uses the site's length to provide an articulated frontage to Player Street, with pedestrian entries, landscaping, street tree planting, planters and façade articulation contributing to the presentation of the building. The inclusion of green screens, planters, landscaped areas assists in softening the built form and improving the visual relationship between the development and the public realm.

Consequently, the narrow site has not resulted in an impractical layout, poor access arrangement or inability to provide the required building functions. On the contrary, the development demonstrates a considered design response that locates access, parking, services, residential uses, ancillary support spaces and landscaping in a manner that responds to the site's dimensions and corner location.

Accordingly, the concern that the site is unable to fulfil the needs of the building design is not supported. The proposed development has been specifically designed to respond to the site's long and narrow configuration and demonstrates that the site can suitably accommodate the intended mixed use NDIS/SDA development without resulting in an unacceptable planning or design outcome.

1.5 Issue 5: Local character and compatibility

Applicant's Response:

Concerns were raised regarding incompatibility of the development with the established residential character of the area, mix of uses considered excessive for the site and the proposed built form being out of character. Further, concerns were raised regarding the scale of the use combined with Short-term accommodation use undermining the intended residential character.

The Upper Mount Gravatt Precinct (UMGP) and Upper Mount Gravatt Core Sub Precinct (UMGCSP) is intended to accommodate the highest development intensity within the neighbourhood plan area, supported by its strong access to major arterial roads, the South East Busway and active transport networks. In particular, the Upper Mt Gravatt core sub-precinct seeks to extend the function and built form character of the Principal Centre north along Kessels Road and Mt Gravatt-Capalaba Road, enabling additional office, commercial and multiple dwelling development.

Having regard to the intended role and function of the UMGCSPP, the neighbourhood plan clearly anticipates a built form outcome that exceeds the scale ordinarily expected within the Low-medium density residential zone. The subject site forms part of an area identified for higher intensity, centre-supporting development, where increased building height, mixed use activity and more urban built form outcomes are expressly supported.

The proposed mixed use development is entirely consistent with this intent by delivering both commercial and residential land uses in a form that reflects the anticipated transition to higher density development. The neighbourhood plan clearly contemplates mid to high-rise built form, including mixed use buildings with podium elements, built-to-boundary walls and reduced front and side setbacks. These form the basis for depicting the intended character and built form outcomes for this locality which includes the subject site.



In this context, the proposed 4-storey mixed use development represents a measured and appropriate response to the planned character of the sub-precinct. The height is substantially below the upper built form outcomes contemplated for sites within the precinct, while still contributing to the intended transition toward higher density development. Accordingly, the proposal is not an overdevelopment of the site, but rather a proportionate built form response that aligns with the intent and anticipated development pattern for the UMGCSF.

We also note Council publication titled “More Home, Sooner” which is a review of the Low-medium density residential zone published on February 2026, indicates that higher density developments are encouraged within this zone.

One of the proposed changes to the LMDRZ is increased building heights of 4 storeys given the site is well located and near frequent public transport or shops. This relates specifically to the subject site as it is within the expected 400m walking distance to a busway station being the Graden City Busway Station. This indicates that the proposed building height will be envisaged for the area and the proposed development is well aligned with this built form outcome.

Some of the other changes also confirm the higher density type of development envisaged for the LMDRZ. This includes the reduction of minimum block sizes from 260m² to 120m² if located more than 400 metres walking distance from high-frequency transport or shopping centres, making it easier to build more homes. This applies specifically to the site given it is located within 400 meters from high frequency transport and shopping centre.

Furthermore, Brisbane City Council is working with the community to create a suburban renewal precinct plan and more specifically the Upper Mount Gravatt Centre Suburban Renewal Precinct. This plan is in progress and aims to provide increased housing choice close to services, employment and business as well as expanding opportunities for the local economy by identifying an appropriate mix of business, retail, personal and community services, and facilities. The proposed development is well aligned with the intent of the Mt Gravatt Centre Suburban Renewal Precinct.



1.6 **Issue 6: Infrastructure, servicing and cumulative impacts**

Applicant's Response:

Concerns were raised that several uses each with distinct operational demands will impact on traffic, waste collection and service access. Matters relating traffic and access have been addressed above in section 1.1. Please refer to section 1 and traffic report provided as supporting documents accompanied with the development application.

All refuse generated by the development will be appropriately stored within bins located in dedicated refuse storage area. Occupants, staff and cleaners will access the ground floor refuse room via the lift for the disposal of waste.

The refuse room has been designed with sufficient size and configuration to ensure that the majority of bins are directly accessible for waste disposal or can otherwise be readily rotated as required. Prior to collection, building management will transfer the bins to the kerbside collection point and, following collection, will return the bins to the refuse room. This arrangement ensures that refuse storage and collection can be managed in an orderly, safe and efficient manner without adversely impacting the amenity or functionality of the development. For further detail, please refer to waste management plan and Response to Information request.