29 April 2026

Brisbane City Council
Chief Executive Officer
GPO Box 1434
BRISBANE QLD 4001

Via Email: CPEDS-DS-PlanningSupport@brisbane.qld.gov.au

ATTENTION: ALEXANDRIA WOOD

Dear Alexandria,

RE: RESPONSE TO FURTHER ADVICE FOR PROPOSED MINOR CHANGE TO DEVELOPMENT APPROVAL UPON LAND LOCATED AT 27 BALACLAVA STREET, WOOLLOONGABBA QLD 4102 - COUNCIL REFERENCE A006967005.

We write in relation to the abovementioned application and Council's Further Advice dated 19 March 2026.

To assist Council with their assessment, and in conjunction with this written response, we attach for your records a copy of the following documents:

- Amended Proposal Plans prepared by *Impact Fitouts*; and
- Traffic Engineering Response Letter prepared by *Modus Transport and Traffic Engineers*.

We trust that the information provided is sufficient for your purposes. Should you wish to discuss this matter further, please do not hesitate to contact me at the office on (07) 3361 9999.

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Yours faithfully
TOWN PLANNING ALLIANCE PTY LTD

Tom Kedda
PRINCIPAL PLANNER

Enc. *Further Advice Response*

Air Quality – Industrial Impacts

1. *The proposed use and its location have the potential to impact on the air quality amenity of nearby sensitive land uses/zoning. Further demonstration is required to ensure that an adequate level of air quality can be provided at the property boundaries of nearby sensitive zonings as per the Industry code.*

   The proposed use and its location have the potential to impact on the air quality amenity of nearby sensitive land uses/zoning. Further demonstration is required to ensure that an adequate level of air quality can be provided at the property boundaries of nearby sensitive zonings as per the Industry code.

   a. *Submit further information demonstrating that the proposed use can comply with the separation distances as prescribed in AO1.1 - AO1.8 of the Industry code. Where compliance with the separation distances cannot be achieved, an Air Quality Report is required to be prepared in accordance with the Air Quality Planning Scheme Policy to demonstrate compliance with PO1 of the Industry code. The Air Quality Report is also to outline where stacks will be located and account for all air polluting activities from the development.*

Response:

Whilst we acknowledge Council's concerns, it is not considered that an air quality report is required for this Minor Change application. Notably, the business uses desktop-mounted 3D printers (*Bambu Lab X1E)*. The proposed activity is distinctly small-scale and low-intensity, utilising a limited number of desktop units that are operated intermittently with an integrated multi-stage air filtration system. Each unit prints material within a sealed build chamber, maintaining negative pressure to limit uncontrolled air release. During the printing process, the *Bambu Lab X1E* model continuously draws air through a three-stage filtration system comprising:

1. Pre-filter for coarse particulates;
2. A H12-grade HEPA filter capable of capturing approximately 99.95% of fine and ultrafine particles;
3. An activated carbon filter designed to adsorb volatile organic compounds (VOCs) and odours associated with thermoplastic printing (e.g. ABS and nylon).

In addition to its advanced filtration capabilities, the unit recirculates air within an enclosed chamber, ensuring that any residual discharge happens at a significantly reduced concentration compared to unfiltered processes. When considering the in-built filtration systems outlined above, it is reasonable to say that any emissions are inherently localised, filtered at source and substantially reduced before release.

Importantly, the printing process does not involve combustion, solvent-based manufacturing, spray application, or any industrial-scale emission sources. Instead, it resembles a workshop or office-based prototyping environment rather than a traditional manufacturing facility, as there is no continuous production line or bulk throughput. In this context, any emissions produced are minor, intermittent, and similar in nature and magnitude to those from typical commercial office equipment. Consequently, emissions are limited to low-volume by-products resulting from filament heating in a controlled environment which are significantly lower typically associated with industrial emission sources as outlined in the industry code.

For further detail, please see the below link which provided additional information, specifications and features regarding the *Bambu Lab X1E* 3D printer: https://au.store.bambulab.com/products/x1e.

Based on the information provided, the proposed industrial design studio is not anticipated to produce air emissions that would negatively affect the air quality to nearby sensitive uses (particularly when compared to the existing coffee roasters over the site), including the residential properties adjoining at the rear. Accordingly, the development achieves PO1 of the Industry code by avoiding and minimising air emissions and ensuring that any emissions generated do not result in adverse air quality, odour, or health impacts at sensitive receptors.

Traffic

2. *Whilst it is acknowledged the proposal involves work within an existing building, the proposal compromises internal access within the building and more importantly on-site servicing, as additional gross floor area is proposed. A response to the Transport, access, parking and servicing (TAPS) code is required to demonstrate the development is designed in compliance with the standards in the TAPS planning scheme policy (PSP).*

    a. *Provide amended plans and a response prepared and certified by a suitably qualified Registered Professional Engineer of Queensland (RPEQ) demonstrating the proposal is designed to ensure the efficient operation and safety of the development and its surrounds as required by PO1 of the TAPS code. The response is to address the following items:*

        i) *The proposed new stairs in the 'garage and display area' reduce the available service bay width to less than 3.5m specified in TAPS PSP table 12 (i.e. to an approximate width of 2.6m).*
        ii) *Demonstrate the proposed development provides on-site servicing facilities and associated on-site vehicle manoeuvring areas which are clearly defined, safe and easily accessible, and are designed to contain potential adverse impacts of servicing within the site in compliance with the service area design standards in the TAPS PSP, particularly with regard to on-site servicing for refuse collection.*

Note: A performance solution for regular servicing by VAN and SRV (rather than AV) may be considered for the scale of the proposed use, however this is to be justified (with plan dimensions) and demonstrated using swept paths in the response.

Response:
Please refer to the enclosed Traffic Engineering Response Letter prepared by *Modus Transport and Traffic Engineers* for the requested RPEQ certified response materials. It is noted that amended plans remove the previous garage / display area constraint and provide a dedicated 3.2m x 5.4m VAN servicing bay, with Modus' swept path assessment confirming a van can safely and efficiently manoeuvre to, within and from the site. Modus also confirms the revised one-space parking provision is consistent with Brisbane City Council's TAPS PSP maximum parking rate for the proposed use and GFA.

Refuse

3. *It is noted the proposed development seeks to reconfigure the internal layout of the existing building with an increase of 35m2 to the gross floor area (GFA). However, no refuse solution has been indicated on the proposed plans to demonstrate the development can accommodate the increased GFA. In accordance with PO63/AO63.1 and AO63.2 of the Centre or mixed use code, PO17/AO17.2 of the Industry code and PO8/AO8.1 and AO8.2 of the Infrastructure code, demonstrate the following:*

    a. *Provide amended plans demonstrating the location of the development's existing refuse storage area and demonstrate that it has sufficient capacity to accommodate the increased GFA.*
    b. *Include the dimensions of the refuse storage area on the amended plans.*
    c. *Demonstrate the refuse storage area is denoted as roofed and wholly screened or is situated within a building.*

Response:
As requested, the proposal plans have been updated to accommodate an on-site refuse storage area within the existing building, underneath the proposed internal access staircase. Based on the expected refuse generation for the 325m^2 industrial design studio, *Modus Transport and Traffic Engineers* have confirmed a total of 4x 240L wheelie bins (i.e. 2x general waste bins & 2x 240L recycling bins) will be sufficient for the proposed development. Refuse collection is proposed via kerbside collection from Balaclava Street, which *Modus* considers appropriate given the low waste generation, small-scale nature of the use and constrained inner-city site. For further detail, please see the attached Traffic Engineering Response Letter prepared by *Modus Transport and Traffic Engineers*.