

24034-B
29 July 2025

Dr Kazal Dewan

Dear Dr Kazal,

Re: Economic Response to Information Request, Proposed Health Care Service, 39-45 Homestead Drive, Flagstone (MCUI/22/2025)

Background and Information Request

As requested, we have prepared the following response to Council's Information Request.

Concept plans indicate that the subject development comprises a Health Care Service of around 180sqm GFA. You have noted that the intention is to potentially accommodate GPs and allied health services across six consultation rooms, one treatment room, and ancillary areas.

Foresight Partners prepared an economic need and impact assessment (ENIA) for this development dated November 2024. A peer review of this assessment was undertaken on behalf of Logan City Council by a third party economic consultant.

Council requested some further information and clarifications via correspondence to the town planning consultant. These requests and our responses are set out in this letter.

Peer Review Conclusions

Prior to addressing Council's requested information, it is prudent to canvass the conclusions of the peer review of the Foresight ENIA. Key conclusions are as follows:

- The peer reviewer agrees with the defined service area in the Foresight report (page 2).
- The peer reviewer agrees that there is a current shortfall of Health Care Services in the service area, and projected population growth will increase this shortfall (p2). This is concluded to be the case even if Jimboomba is included within the service area.
- Ultimately, the peer review concludes that the ENIA has demonstrated a strong level of community and economic need for the proposed development (p3).
- No adverse economic impacts on the centre network would arise from the development (p5).
- The primary question/concern identified in the peer review is that of 'planning need'. More precisely, that is, whether the need can be accommodated in the Flagstone PDA.

The findings of the peer review are considered in this response.

Response to Information Request

Request: The proposed development of a Health Care Services is inconsistent with the land uses envisaged to occur within the Rural Residential zone.

Response:

This is a town planning matter.

From an economic perspective, there is a demonstrated need for additional Health Care Services which can be addressed by the proposal. There are no current development approvals which can adequately address the identified need.

Considering these factors and that health care services are a daily essential of life, significant disadvantages to the community will accrue should the proposed development not proceed.

Request: Council questions the service area's exclusion of Jimboomba and whether the proposal can be located within a centre zone or in the PDA.

Response:

As mentioned, the peer reviewer agrees with the defined service area in the Foresight ENIA, including the exclusion of Jimboomba. Council's claim that the service area should include Jimboomba is not justified. Any Centre zoned land in Jimboomba is irrelevant to this assessment.

Regarding Centre zoned land opposite the subject site, this Centre is fully developed. There is currently one vacant tenancy in this Centre of 89sqm which is too small to accommodate the proposal. Vacant tenancies in the Flagstone Major Centre (i.e. around Coles) include a 214sqm commercial tenancy.

The scale of need indicated in the Foresight ENIA is in the order of 3,560sqm of health care floorspace by 2031. It is clear that available tenancies cannot meet the identified need.

Whilst it is acknowledged that health care services will be provided in the PDA in future, rigid adherence to centre-zone requirements in rapidly growing areas creates systemic risk of service provision gaps. With the timing for the delivery of future services being unknown, the local community would benefit significantly from timely provision of health services to address a presently unmet need for an essential service. Relying on theoretical future supply in the PDA would fail to address the current need, thereby generating economic and social costs associated with persistent gaps in health care.

Furthermore, a small-scale GP clinic in this location would perform a lower order role compared to any potential future concentration of health care services in the PDA. As agreed by the peer reviewer, there would be no adverse impacts from the proposed development on the centre network or hierarchy.

As a final consideration, when considering a truncated MSA that excludes the PDA, there is still a current need for additional GPs. This strengthens the level of planning need for the proposed development at the subject site and its role in servicing the MSA population outside the PDA.

Request: Provide further justification for the forecast population growth.

Response:

The Foresight ENIA population projections are reproduced below.

As stated in the report, these projections are based on the anticipated ramp-up of major residential projects in the MSA.

The methodology included a review of the yield of approved Context Areas in the Flagstone PDA as well as other major residential projects (Frasers New Beith, Riverbend Celestino, Flourish, Pebble Creek) and projections of the anticipated residential take-up in these projects.

For context, the total additional yield from these projects is estimated at around 17,690 dwellings (i.e. additional to established dwellings). At the 2021 average household size of the MSA (3.18 persons), this implies an additional residential population of 56,520 persons in these projects alone. It is anticipated that the total development timeline for these projects will be beyond 2036, hence the projected growth of 31,710 persons in the ENIA (2024-36).

Despite any questions regarding future growth projections, there is a significant current need for additional GPs in the MSA which does not rely on future growth (report to report Table 4.3).

Table 2.1: Estimated Population, Main Service Area, 2016 to 2036

At June	2016	2021	2024	2031	2036	Incr. 2024-2036
MSA Population	7,830	10,300	12,170	27,130	43,880	31,710
Avg. Change p.a.		494	623	2,137	3,350	

Source: Foresight Partners' estimates based on ABS data, QGSO Population Projections medium series 2023 edition, known residential developments.

Request: Health Care Services are a Permissible Use in the Urban Living, Major Centre, and Industry and Business Zones of the PDA. Consider the land available to accommodate the proposal.

Response:

The permissibility of the proposed Health Care Services land use in these precincts is acknowledged. The following factors are relevant:

- The primary intention of the Urban Living Zone is to provide residential uses. District Centres and Neighbourhood Centres are also anticipated to be provided in this zone. Due to the master planned nature of development in the PDA, it is very unlikely that Health Care Services (or other centre activities) would be developed outside the District and Neighbourhood Centres identified in approved Context Plans.
- Based on a review of Map 5 – Community Facilities in the Greater Flagstone Development Scheme, approved Context Plans, and approved Plans of Development, there are no District Centres or Neighbourhood Centres in the PDA which are constructed and available to accommodate the present need.
- The Industry and Business Zone intends for primarily industrial uses with some ancillary uses which support the function of the zone. It is expected that no meaningful provision

of health care uses will be provided in this zone. Regardless, this land is not developed nor is it available to meet the present need.

- There is no commercial or other development land available for sale in the PDA (based on online searches). This further supports the unavailability of alternative sites.
- There are no approved applications for Health Care Services which can address the current need.
- No specific sites or DAs were identified by Council or the peer reviewer as realistic and currently available alternatives to accommodate additional Health Care Services.
- Further to the above, the peer reviewer appropriately identified that the Queensland Planning and Environment Court approved a service station use in the Rural Residential zone in Flagstone despite potential alternative locations where the use was permissible¹. The Court acknowledged the present and growing need for service stations and that refusing the development would unlikely result in the timely satisfaction of said need.

Based on these factors, it is clear that there is a planning need for the proposed development.

Request: Provide further information surrounding the requirement to move from the existing tenancy located at Shop 8b, 1-21 Bushman Drive, Flagstone to the subject site.

Response:

The applicant has advised that reasons to relocate to the proposed site include the following:

- Additional floorspace to what is available in the current tenancy is required to effectively operate and grow the business.
- The number of patients using the existing medical centre is growing.
- A larger tenancy (as proposed) will allow the medical centre to better serve its increasing base of patients and the growing local population.

We agree with the peer reviewer that these factors are indicative of need.

Conclusion

Ultimately, it is concluded that there is a strong present and growing need for additional Health Care Services in the local area that cannot be adequately met.

The peer reviewer concurs with the Foresight ENIA and stated that there is “*a strong level of community and economic need and no adverse impacts upon the centre network would arise*”.

I trust that this letter contains the required information.

Yours sincerely,



Jordan Musk
Director

¹ Peet Flagstone City Pty Ltd v Logan City Council and Anor [2016] QPEC 24