

FORMAL OBJECTION TO DEVELOPMENT APPLICATION A007011234

837, 845 & 857 Waterworks Road, The Gap QLD 4061

Lots 1–3 on

Application reference: A007011234

Proposal: Development permit for material change of use and building work for retirement facility, 76 units, within the flood overlay; extension to existing outdoor sport and recreation use; and reconfiguring a lot for subdivision by lease, 99-year lease, and access easement.

Submission period: 5 June 2026 to 29 June 2026

Submitter details

Email for Council response:

29 June 2026

Submission

I object to Development Application A007011234 and request that Brisbane City Council refuse the application.

I object because the proposal is totally inconsistent with the intended height, scale, form, landscape character, ecological protection, density assumptions and infrastructure assumptions for the site, as outlined in The Gap Neighbourhood Plan.

The issue is not whether retirement housing is desirable in principle. The issue is whether this particular proposal, in this particular location, at this particular height and scale, is compatible with The Gap. It is not.

The Gap is not a high-rise suburb. It is a leafy, low-density, landscape-sensitive suburb characterised by established vegetation, open space, surrounding hills, bushland edges and a strong connection to the natural environment. The proposed 8 to 10 storey built form would be grossly out of scale with the surrounding area and would dominate the landscape.

I object to the application on the following grounds:

1. Excessive height, bulk and scale

The proposed building height of more than 8 storeys to Waterworks Road and more than 10 storeys at the rear is grossly inconsistent with the existing built form of The Gap. The proposal bears no reasonable resemblance to nearby development and would introduce a high-rise built form into a suburb where development is overwhelmingly low-rise.

2. Conflict with The Gap Neighbourhood Plan

The Gap Neighbourhood Plan identifies The Gap as a low-density suburb complemented by established vegetation. The proposed development is incompatible with the neighbourhood plan's intended height, scale, form, amenity, character, community expectations and infrastructure assumptions.

3. Visual dominance and landscape impact

The development would not merely be visually prominent. It would dominate the landscape. It would be highly visible from Waterworks Road, the main access corridor into The Gap, and from surrounding residential areas and elevated viewpoints. It would fundamentally alter the arrival experience into The Gap and create an abrupt, unnatural vertical edifice in a green foothills setting.

4. Misleading or inadequate visual material

The applicant's indicative imagery appears to understate the true height, bulk and visual dominance of the proposal. In particular, the imagery appears to depict nearby mature trees as if they substantially screen or soften the upper levels of the development, when local observation and aerial/street imagery suggest the buildings would rise well above the surrounding tree canopy. Council should require verified photomontages based on surveyed ground levels, building RLs, roof and plant heights, tree heights and accurate viewpoint methodology.

5. Ecological and wildlife impacts

The golf course forms part of a significant green landscape connected to vegetation, habitat, wildlife movement and the broader bushland character of The Gap. Council should require detailed ecological, arborist and wildlife movement assessments. The applicant must demonstrate that the proposal will retain and enhance ecological features, protect significant vegetation, minimise fragmentation, avoid edge effects, and protect wildlife habitat and movement functions.

6. Flood overlay and stormwater risk

The public notice confirms the proposal involves building work within the flood overlay. This is especially concerning for a retirement facility, where residents may have reduced mobility or increased vulnerability in an emergency. Council should not approve the application unless flood storage, overland flow, stormwater discharge, downstream impacts, emergency access and evacuation risks are fully and independently assessed.

7. Traffic and access impacts on Waterworks Road

Waterworks Road is already a heavily burdened corridor and is the main access route into The Gap. The development would add residents, visitors, staff, service vehicles, delivery vehicles, waste collection, emergency vehicles and construction traffic. Council should require a rigorous traffic impact assessment based on actual peak-hour conditions, including impacts on Waterworks Road, Bennett Road, Payne Road, nearby intersections, pedestrian safety, mobility scooters, public transport and emergency access.

8. Construction disruption

A development of this height and scale would likely create substantial construction impacts, including heavy vehicle movements, traffic disruption, noise, dust, vibration, staging impacts and road safety concerns. These impacts must be assessed before any approval is considered.

9. Inappropriate use of “retirement living” to justify excessive built form

The applicant should not be permitted to rely on the label of “retirement living” or “ageing in place” to justify a building form that is otherwise excessive and incompatible with the site. Retirement housing may be a legitimate community need, but it does not justify an 8 to 10 storey development that conflicts with The Gap Neighbourhood Plan and local character.

10. Unacceptable precedent

Approving this application in its current form would set a dangerous precedent for high-rise development within The Gap under the guise of retirement living or similar uses. This would undermine the purpose of neighbourhood planning and the community expectations that The Gap remain a leafy, low-density, landscape-sensitive suburb.

For these reasons, I strongly object to Development Application A007011234 and request that Brisbane City Council refuse the application.

I request that this be treated as a properly made submission and that I be notified of Council’s decision.

Yours sincerely,
Signed electronically:

29 June 2026