



Dedicated to a better Brisbane

6 August 2026

Aura Holdings Pty Ltd
C/- Urbis Ltd
Level 32, 300 George Street
BRISBANE CITY QLD 4000

ATTENTION: Jorja Feldt

Application Reference: A007011234
Address of Site: 837 WATERWORKS RD THE GAP QLD 4061

Dear Jorja

RE: Further advice

Council has completed a further review of the above application, taking into account the community feedback received during the public notification period. Following this assessment, further information and amendments are required to satisfactorily address the following matters:

Building height

1. The proposal seeks a performance outcome for building height for the site. Whilst thoughtful siting and design of the proposed retirement living facility is acknowledged, the site is zoned sport and recreation and is surrounded by areas zoned low density residential characterised by predominately 1-2 storey development and open landscaped areas. Therefore, further information is required to demonstrate the proposed height ranging from 7 storeys towards Waterworks Road, to 9 storeys at the rear, achieves sensitive transitions in height towards the boundaries and is not visually dominant from key vantage points and the existing streetscape.

To assist Council's assessment,

- a. In accordance with PO8 of the Retirement and residential care facility code, provide visual analysis including further perspectives and photo montages, demonstrating the visual integration of the development within its surrounding context. The analysis should include but not limited to, views from key focal points, views from residential properties and public vantage points along Waterworks Road, Payne Road and Bennett Road.
- b. Demonstrate the building height is commensurate with the height of existing mature street trees (including established gum trees) and significant vegetation on the site and how this vegetation contributes to mitigating the visual prominence of the development.
- c. Provide further justification demonstrating that the proposed height and massing will not adversely impact the established character and amenity of the surrounding low density residential area.

- d. Submit a digital architectural model for input into Virtual Brisbane for review and analysis.

Building length

2. The proposed buildings of 41 and 45m length exceeds AO11.2 of the Retirement and residential care facility code. Whilst there is a good degree of variation in the built form, further information is required demonstrating the building can be read as a series of buildings or provide opportunity for dual aspect windows to dwelling units. The length is to be demonstrated as keeping with the form and character of the area to meet PO11 of the Retirement and residential care facility code.
 - a. Provide further information demonstrating the design responses which have been incorporated to break up the building length.

Building variation and subtropical design

3. The proposed variation in the building materials and colours and subtropical design features is acknowledged, however further changes may be possible to reduce the appearance of building bulk and balance the height of the building with the neighbourhood and street character as per PO12 of the Retirement and residential care facility code. Including dual aspect windows to habitable rooms would reduce reliance on mechanical heating and cooling to provide for Brisbane's subtropical character and lifestyle as per PO26 of the Retirement and residential care facility code.
 - a. Consider amending the design to include an alternative balustrade typology to assist in providing a visual break to components of the building and reducing the extent of full height glazing to external walls instead increasing the proportion of solid wall.
 - b. Consider including dual aspect windows to bedrooms and habitable rooms.

Needs assessment

4. The housing needs assessment includes a large catchment area to assess housing need, which is different and larger than the catchment used for the Sport and recreation needs assessment. The area of Milton, Auchenflower and Toowong is not considered necessary in the catchment for assessing housing needs.
 - a. Provide an amended Needs Assessment which refines the housing catchment to be the same as the Sport and recreation needs assessment.

Irrigation strategy

5. The proposal does not clearly demonstrate that adequate onsite water storage can be provided to support the proposed landscape measures on the site, including the significant quantity of containerised planting, and show the location of rainwater storage tanks.
 - a. Amend the proposal and provide an Irrigation Strategy that outlines the requirements for the proposed stormwater harvesting and sufficient water storage methods, with reference to the Landscape works code (PO12, PO13 and PO15) and the Landscape design planning scheme policy.
 - i. Demonstrate the proposed irrigation application rates for the onsite landscape areas within the development which is calculated using the methodology within Section 6.1 – Table 3 of the Landscape design planning scheme policy;

- ii. The stormwater harvesting capacity and water tank storage requirements to effectively irrigate the onsite landscape areas which is calculated using the methodology within Section 6.3 – Table 5 of the Landscape design planning scheme policy;
- iii. The proposed size, capacity and location of the water storage devices to service the irrigation requirements of this development.

Existing vegetation

- 6. Insufficient documentation is provided to undertake an assessment of the proposed removal and interference of vegetation on site. Whilst an Arboricultural Impact Assessment is provided, this report only details the impact to the existing Significant Landscape Tree and does not provide an assessment of all impacted vegetation on site. The proposal is to mitigate adverse impacts to ecological features and visual amenity through the retention of significant vegetation in accordance with PO1 and PO3 of the Gap neighbourhood plan and PO8, PO28 of the Retirement and residential care facility code.
 - a. Provide an amended Arboricultural Impact Assessment (AIA) prepared by an AQF Level 5 Arborist that provides a full assessment of all vegetation removal and interference on site. The AIA is to include the following:
 - i. Botanical species name of trees;
 - ii. Height, diameter of tree trunk at breast height and crown diameter;
 - iii. General health assessment and character of trees including habitat values;
 - iv. Identification and illustration of the Tree Protection Zones (TPZ) and Structural Root Zones (SRZ) of trees in accordance with AS:4970;
 - v. Description of the proposed works and construction methodology to be used within TPZ of trees;
 - vi. Evaluation of proposed construction methodology and potential impacts on the trees;
 - vii. Evaluation of any pruning works (including canopy and/or root pruning) which may be required as a result of the proposed works;
 - b. Where vegetation removal is proposed, provide a canopy offset calculation and replacement planting plan that includes planting locations, species and stock sizes that ensures no net loss of canopy is achieved.

Landscape design

- 7. The Gap neighbourhood plan code and Retirement and residential care facility code require developments to achieve a high-quality design incorporating subtropical design principles including generous landscaping provisions. While the proposal indicates landscape buffers including deep planting areas, further documentation is required to ensure that the proposed landscaping achieves a high-quality multilayered planting design that supports visual screening of the built form and softening of hardstand areas required under City Plan 2014.
 - a. Provide an amended Landscape Concept Plan prepared by a suitably qualified Landscape Architect that includes sections throughout the site that clearly demonstrate the proposed landscape outcomes along the boundaries in relation to the proposed built form;
 - b. Include a minimum of 3 detailed planting plans of the proposed landscape buffers including adjacent to the open-air car parking, along the Waterworks Road frontage and along the eastern boundary. The plans are to include planting densities, stock

sizes and a planting palette with a multilayered mix of fast-growing pioneer species and mature stock of slower growing species;

- c. Include a preliminary maintenance schedule that details how the landscape buffers will be maintained to achieve full coverage of the planting areas within 2 years in accordance with PO8 of the Landscape work code;
8. The proposed open air car parking at the frontage of the site has the potential to create several amenity impacts including visual amenity, noise, odour, glare and heat island effects. Onsite car parking is to achieve a positive interface with the streetscape and adjoining sensitive uses through high quality landscape buffers that support subtropical design principles consistent with the local subtropical climate and reflect the suburban character of the area in accordance with PO2 of the Gap neighbourhood plan code and PO8, PO27 and PO33 of the Retirement and residential care facility code.
 - a. Demonstrate how the proposed shade tree planting will effectively shade the open air-car parking area by a minimum of 50% at maturity.
9. The proposed 1000mm soil depth containerised planter on the southeast corner of the site creates a constrained area of deep planting. Considering the built form outcomes in term of height, scale and setbacks from adjoining properties, this area would be more suited as inground deep planting. This outcome would ensure an improved interface with adjoining properties and allow for increased opportunities for large subtropical shade trees at this junction to address PO8, PO28 of the Retirement and residential care facility code.
 - a. Provide amended plans including a Landscape Concept Plan prepared by a suitably qualified Landscape Architect that removes the proposed 1000m containerised planter from the southeast corner and replaces with inground planting, incorporating additional large subtropical shade trees at this junction.

Left-in/Left-out access – Waterworks Road

10. The submitted proposal does not adequately demonstrate compliance with the Transport, Access, Parking and Servicing Code, nor relevant Australian Standards and Council requirements for external works. The proposal to reinforce the left-in/left-out crossover arrangement on Waterworks Road through the installation of double barrier line marking is not supported. This treatment is not considered an appropriate or sufficient measure to formalise or enforce directional access at this location.
 - a. To demonstrate compliance with PO1 and PO3 of the Transport, access, parking and servicing code, provide revised engineering design drawings demonstrating a compliant access arrangement through the provision of a Type 2 Centre Island crossover in accordance with BSD-2021, inclusive of detailed geometry and dimensions of the crossover; splitter island design and dimensions; and associated line marking and signage consistent with the standard drawing. The revised design must clearly demonstrate how the proposed access arrangement safely achieves the intended left-in/left-out functionality in accordance with Council standards.

Pavement markings – Waterworks Road

11. The recommendation to install 'Keep Clear' pavement markings on the westbound lanes of Waterworks Road adjacent to the proposed driveway is not supported. In accordance with AS 1742.2:2009 (Manual of Uniform Traffic Control Devices – Traffic Control Devices for General Use), 'Keep Clear' markings must not be used primarily to facilitate access to or egress from a driveway or side street.
 - a. Remove this treatment from the proposal and revise the access strategy accordingly to rely on compliant geometric design and traffic control measures.

- b. Submit a concept signage and line marking plan for all proposed external works within the road reserve associated with the development, including Waterworks Road and Bennett Road. The plan must clearly identify all existing and proposed traffic control devices (signage, linemarking and pavement markings), and demonstrate compliance with relevant Austroads guidelines, and Council standards.

Loading area design and compliance

12. The submitted architectural plans do not specify critical design parameters of the proposed loading area, including its dimensions and gradient. This information is necessary to demonstrate compliance with the relevant servicing and manoeuvring requirements.
 - a. To demonstrate compliance with PO4/AO4.1 and AO4.2 of the Retirement and residential care facility code and PO8/AO8.1 and AO8.2 of the Infrastructure design code, submit amended architectural drawings that clearly identify and detail the length and width of the loading area and the longitudinal and crossfall gradients of the loading area. The provided information must demonstrate that the loading area is appropriately designed to safely and efficiently accommodate waste servicing vehicles in accordance with Council requirements.

Existing waste servicing

13. Ashgrove Golf Club appears to have an existing front-lift waste bin located within the Ashgrove Golf Course car park (adjacent to 803 Waterworks Road), which appears to service the golf club. The submitted proposal indicates that this car park is to be demolished, however it is unclear how the existing waste servicing arrangement for the golf club will be impacted or maintained.
 - a. Provide clarification and supporting documentation demonstrating:
 - i. The current waste servicing arrangement for the Ashgrove Golf Club;
 - ii. Whether the existing front-lift bin is to be relocated, replaced, or otherwise accommodated as part of the development; and
 - iii. How the proposed development will ensure that uninterrupted and compliant waste servicing for the Ashgrove Golf Club is maintained without adverse impact. The response must clearly demonstrate that the proposed development will not compromise the ongoing waste management operations of adjoining land uses.

Fuel Burning – Back Up Pumps and Generators

14. Provide additional details regarding any proposed on-site fuel burning activities, such as standby power generators, fuel pumps or fire pumps that run on diesel or gas. If such equipment is planned, please outline the following information:
 - a. the type, location, and cumulative fuel burning capacity measured in megawatts (MW) for each piece of fuel burning equipment;
 - b. the type of fuel used to operate the equipment, along with the quantity;
 - c. information on the positioning of vents and controls aimed at preventing undesirable air and noise emissions towards sensitive uses;
 - d. the annual number of hours the equipment is expected to be operational, including testing as per the manufacturer's recommendations; and e) for equipment powered by Diesel, an evaluation in accordance with Australian Standard AS1940 and suggested actions to ensure any potential leaks or spills are adequately contained.

Advice

Brisbane Green Factor Scorecard

15. A Brisbane Green Factor scorecard may be used to demonstrate the quality and quantity of proposed landscaping plans on the site. Use of the tool is encouraged, particularly where landscaping is argued as a key element to justify high-quality design outcomes. The Brisbane Green Factor can be accessed on Council's website at: <https://brisbanegreenfactor.brisbane.qld.gov.au/>.

Please phone me on telephone number below during normal business hours if you have any queries regarding this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'CDixon', with a long horizontal flourish extending to the right.

Chris Dixon
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