30/09/2026

The Assessment Manager
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

Re: Submission objecting to Development Application A006964015
Material Change of Use – Child Care Centre (94 child care places)
Site address: 1093 & 1095, Waterworks Road, The Gap

Dear Sir/Madam,

I am the owner of .... , which adjoins the above site. I object to this application and ask Council to refuse it. My grounds are set out below.

The site is in a residential zone and is subject to The Gap neighbourhood plan under Brisbane City Plan 2014. That plan seeks to maintain The Gap's traditional, low-density suburban character and to protect its residential amenity. In my submission, a 94-place child care centre operating up to 12 hours a day on this site is not consistent with that intent, and does not comply with the relevant assessment benchmarks, including The Gap neighbourhood plan code, the applicable Residential zone code, Transport, access, parking and servicing code and the Stormwater concerns.

1. Traffic and access on Waterworks Road

The proposed entry and exit on Waterworks Road will generate very high vehicle movements, concentrated in the morning and afternoon peaks when the road is already busy.

There are only seven (7) parking spaces provided for parents for the proposed 94 placed centre and I believe is insufficient carparks which will lead to queuing of cars to enter and exit leading to delays to through traffic and buses traversing on Waterworks Road and from Settlement Road.

I ask that Council require an independent review of the traffic report's assumptions, including peak-hour trip generation, driveway queuing, turning movements, sight distances and the cumulative effect of nearby school traffic.

2. Inadequate parking and overflow into surrounding streets

The on-site car parking is inadequate for staff and for the number of parents dropping off and collecting children. The shortfall will fall on the surrounding area:

- The centre will produce hundreds of vehicle trips each day, with vehicles turning into and out of the site, increasing safety risks to pedestrians and children accessing The Gap State School and Park 'n Ride bus stops on Waterworks Road.

- Parents are likely to use the adjacent park and ride facility, which is regularly full, reducing spaces for commuters.
- Parents and staff will park for extended periods on Kullaroo, Yuruga and Romea Streets.
- These streets already carry high volumes of traffic and parking from parents using the back gates of the nearby primary school.

The cumulative effect of school and child care traffic will worsen congestion, road safety and access for residents.

3. Noise from plant and equipment

The application does not adequately detail the mechanical plant (air conditioning, ventilation, kitchen exhaust and similar). Given the size and type of the development, I believe actual noise emissions will considerably exceed the estimates provided.

I ask that Council require a detailed acoustic assessment by a suitably qualified acoustic consultant, showing plant locations, specifications and predicted noise levels at nearby sensitive receivers, including the second storey of my proposed dwelling.

4. Loss of residential amenity from operational noise

I have lived at .... since childhood and live next to the Gap State primary school.

During play times, the children can disperse around the school grounds including a large open space area, 200m away. Even with the large grounds, two school buildings in between the noise from children playing carry across the street. This is tolerable as the noise is restricted to designated play times.

Other school noise such as school drop off is only permitted from 8am - 9am and pick up between 2:30pm -3:30pm. The operating hours for the school are shorter and includes 12 weeks of school holidays, when the school is not operating.

A child care centre for around 94 children, operating for 13 hours from 6:00am for opening staff to 7pm for the whole year, would remove those quiet periods. Outdoor play, arrivals and departures, and staff and vehicle activity would create noise starting from early morning, continuing throughout the whole day until evening and unlike our current conditions the noise would not ease during school holidays. This is inconsistent with the amenity expected in a low-density residential area and would significantly harm nearby homes.

5. Noise Study

The Noise Study contends, the increased noise from peak hour traffic hum is as loud and disturbing as staff and child drop offs and pickups.

Noise from the proposed carpark, such as slamming of car doors, parents dealing with babies and small upset children from 6:30am are sharper and carry further than generalised moving traffic hum.

The development requires windows only to be closed when playing amplified music and can be open at all other times. I do not believe the noise factor from the proposed development from both the first and second stories from the sounds of up to 94 babies and young children

with little to no emotional regulation will carry and has not been considered with the noise study.

6. Limitations to future new dwelling

With the change to Childcare zone, additional regulations on what I can build as pertaining to second story developments overlooking a childcare centre will apply to any future building plans or I will have to seek further development approval for a residential house design that would otherwise be fully compliant with council residential building codes.

7. Inadequate fencing and acoustic detail

The fencing details provided are insufficient. It is unclear what height, materials and acoustic performance are proposed along the boundaries, or whether the landscaped buffer and acoustic fencing required by the Child care centre code for boundaries adjoining residential land are provided.

With my proposed second story dwelling, aside from being more exposed to noise than a boundary fence can shield. I ask that Council require full fencing and acoustic treatment details that take my proposed dwelling into account.

8. Stormwater and drainage

My property is on the .... . I am concerned that the increase in impervious surfaces (buildings, driveways, car parking and play areas) will increase stormwater runoff onto my land. The application does not adequately demonstrate how stormwater will be detained, treated and discharged to a lawful point of discharge without adverse impact on downstream properties. I ask that a detailed stormwater management plan be provided and independently reviewed.

9. Limited need for additional child care in the area

There are ten (10) childcare centres providing four service offerings locally to absorb increased demand for placements. With vacancies in most of these centres, including closed rooms in the Curiosity Tree on Payne Road because of low demand.

Approving another large centre risks oversupply, leaving under-used facilities while the impacts above are borne by the community.

Childcare services operating in The Gap, spread across four types:

- **Long day care (5):** The Gap Early Childhood Centre, Uniting Early Learning, Play and Learn, Curiosity Tree, The Gap Cubbyhouse Montessori
- **Kindergarten**: C&K The Gap Community Kindergarten
- **Family day care**: Three Wee Owls
- **OSHC/school-age care**: YMCA The Gap, YMCA Hilder Road, St Peter Chanel

Notably, several of these — including two long day care centres and the kindergarten — are already clustered along or near Waterworks Road itself, close to the proposed development site.

Request

For these reasons, I ask that Council refuse the application. If Council is minded to approve, I ask that it impose, at a minimum, conditions requiring: a peer-reviewed traffic and parking assessment; a detailed acoustic report covering plant and operations; reduced operating hours and child numbers; upgraded boundary fencing, landscaping and acoustic barriers; and a full stormwater management plan.

Please notify me of Council's decision. I understand that as a submitter I may have appeal rights under the Planning Act 2016.

Yours faithfully,

....