



Dedicated to a better Brisbane

30 June 2026

The Dp Gap Holdings Trust
C/- Plan A Town Planning Pty Ltd
PO Box 13
FORTITUDE VALLEY QLD 4006

ATTENTION: Matt Geyle

Application Reference: A007025195
Address of Site: 842 WATERWORKS RD THE GAP QLD 4061

Dear Matt

RE: Information request in accordance with the Development Assessment Rules

Council has carried out an initial assessment of the above application and has identified that further information is required to progress the application to a decision.

The proposed development is categorised as Impact assessable and public notification is required to be undertaken for this development application in accordance with the Planning Act 2016. All submissions received regarding the development application will be considered as part of Council's assessment and further information or changes may be required following the completion of public notification and upon review of any submissions received.

Land Use and Street Activation

1. The subject site is located in both the District centre and Low density residential zones. There is concern that the Warehouse use is overbearing due to the scale, height and bulk proposed. Given the built form and proposed land use is considered inconsistent with the intent and overall outcomes for the applicable zones and as a result is impact assessable, there is concern about the appropriate use and activation of the street frontage for the development. The addition of commercial uses in line with the centre activities use group along the frontage would provide for opportunities for a mixed-use development with a diversity of uses to better align with both The Gap neighbourhood plan and the District centre zone codes.
 - a. It is recommended to review the proposed development and include retail and commercial components along the frontage to encourage and promote active uses for a socially vibrant centre.
Note: retail and commercial uses may require amendments to design, carparking and landscaping. It is recommended to review these items together.

Cross-block link

2. The site is required to provide a 1.8m widening along the western boundary and the construction of a 1.8m path to provide access from Waterworks Road to the Council parkland at the rear of the site. It is noted that previous approvals over the site included this pathway to facilitate pedestrian movement through District centre zoned land and increase the activity through the site and achieve PO4 of the TAPS code. Previous advice provided to the applicant included this requirement, with "Road Widening Plan 'RC 16002 issue 1 – 836-842 Waterworks Road" showing the area for the pathway.

The planning report provided by Plan A in support of this proposal briefly discusses earthwork/retaining wall constructability as a reason for not providing the dedication/pathway. This is not supported. After review of the submitted concept engineering earthworks plans prepared by Create Engineers it appears that the proposed new/reconstructed boundary retaining area and areas of significant cut and fill across the site are required regardless to facilitate the development.

- a. Provide a revised proposal (included revised earthworks plan) demonstrating a 1.8m widening (including truncations) along the western boundary and a construction of a 1.8m concrete path as per the current approval on the site. Ensure any other revised engineering components of the development (i.e. internal traffic aisle, parking dimension, earthworks, etc) retain compliance to the relevant City plan codes.

Lawful point of discharge

3. The Site Based Stormwater Management Plan (SBSMP) prepared by Create Engineers has been assessed. The submitted information outlines a proposed lawful point of discharge (LPD) within the downslope property (Alan Willing Place Park). It is noted the approved LPD of the previous approval (A006345436) on the site was also the park, however this is a new development application. No property owners' consent has been provided for the discharge/proposal. Note that while the land is owned by Brisbane City Council, Development Services does not grant rights to access this land or give property owners consent.
 - a. Obtain consent to discharge and construct drainage within the neighbouring Council owned land, seek consent from Council Land Use management team, a request can be sent to the following mailbox: BI-LandUse@brisbane.qld.gov.au. The request will need to be supported with relevant information (stormwater management report/plans).

Refuse

4. It is noted that a "Refuse Area" has been provided between 'Unit 09' and the eastern side boundary, adjoining a sensitive land use. Whilst the area has been provided, it is unclear whether the bin area is wholly roofed and screened and provides the appropriate bin capacity within the dedicated space. The bin storage is required to be wholly screened, sited and located in a manner that enables occupants' convenient access to dispose of waste streams and enable a Front-Lift Loading Refuse Collection Vehicle (RCV) to safely and efficiently collect waste. It is also noted that the current refuse arrangements do not appear to function appropriate due to the proposed carparking located between the refuse area and the pickup area.

To address AO63.1 & AO63.2 of the Centre or mixed use code, AO17.2 of the Industry design code and AO8.1 & AO8.2 of the Infrastructure design code, provide amended architectural plans demonstrating the following:

- a. Clearly demonstrate the development has provided either a dedicated refuse room (within a building) or refuse enclosure (roofed & wholly screened) which has a minimum area of 20m² (internal dimensions of 10m x 2m) to house four (4) x 3,000L bulk bins (i.e., two (2) x 3,000L Front-Lift bins for general refuse + 2 x 3,000L Front-Lift bins for commingle recycling).

OR

- b. Alternatively, clearly demonstrate the location of two separate refuse enclosure's (roofed & wholly screened) which each have a minimum area of 10m² (internal dimensions of 5m x 2m) to house two (2) x 3,000L Front-Lift bins. Also show the following:
 - i. Clearly denote the area (m²) and internal dimensions of the refuse solutions.
 - ii. Demonstrate the location of the developments refuse solution/s enables a Front-Lift Loading RCV to drive straight-on to the front-lift bins.

- iii. Ensure the location of the refuse solution is not impeded by carparking bays or the like.
5. A review of the 'Ground Floor Plan' has identified that the entire two-way aisle/ carriageway trafficked by the RCV is less than 6.5m. Furthermore, a review of the 'Colliers – Service Vehicle Swept Path Analysis' has identified that the 10.52m Front-Lift Loading RCV clearance envelope conflicts with a parking bay and built form. To address PO1/ AO1, PO19/ AO19.2 & 19.3 of the TAPS code, PO17/ AO17.2 of the Industry design code and PO8/ AO8.1 & AO8.2 of the Infrastructure design code, provide amended architectural plans demonstrating the following:
- a. Demonstrate the entire two-way aisle/ carriageway trafficked by the RCV is 6.5m wide, inclusive of the T-Head turnaround area.
 - b. Utilising amended architectural plans provide an RPEQ certified swept path analysis which demonstrates a 10.52m Front-Lift Loading RCV (As per BSD-3009) as specified in Table 3 of the Refuse PSP can safely and efficiently service the development whilst utilising a lock-to-lock time of 6.00s, curb-to-curb turning radius of 9.757m and 0.5m clearance envelope.

Deep planting, Streetscape and Public Realm Interface

6. The proposed landscaping does not meet the definition of deep planting in any area of the site and therefore does not comply with AO56.2 of the Centre or mixed use code (COMUc). The landscaping provided within the carpark is not located within the required space of 5.2m x 2.4m between every 6 parking spaces in accordance with AO57.2 of the COMUc. Whilst the space to the rear of the site has a larger overall area dedicated to landscaping, the width still does not meet deep planting requirements. The front landscape buffer is interrupted by the terraces to units 1 and 10 and results in an increase of hardstand and bulk within the frontage and does not comply with AO58 of the COMUc.

There is concern that the development does not provide any true deep planting and instead provides retained and concrete paved terraces at the frontage of the site. The development is not considered to positively define the street edge and instead presents predominately hardstand areas, failing to minimise impact on the quality of the adjoining streetscape and public realm.

- a. Provide amended plans (including a Landscape concept plan) which clearly shows areas for deep planting in accordance with the above identified requirements. Changes to building design and setbacks may be required in order to resolve items.
- b. Amend the design to remove the terraces at the frontage and
- c. Replace terraces with large subtropical trees and if desired low impact and integrated seating within the landscape setting

Built form

7. The proposed buildings are characterised by boxy, flat, and unarticulated building typologies which are not respectful or reflective of the intended form with the centre zoned area to meet PO33, PO34, PO36 COMUc, and PO2 of The Gap neighbourhood plan code. As well as this, the interface between the sensitive zones and uses may be impacted by the current design of the structures, especially at the rear of the site where adjoining the 5 storey component of the development.
- a. Amend the design to provide variation in colour, materials, and texture along the long exposed western wall of unit warehouses.
 - b. Provide for additional variation in roof forms and building caps to respond to the subtropical climate.
 - iv. Consider eaves overhangs
 - v. Consider pitches which may facilitate clerestory windows for light and cross ventilation
 - c. At the rear, where seeking 5 storeys, provide a more detailed material selection which assists in describing how the proposal will break down building bulk

- vi. Consider metal sheet profiles which cast shadows to provide suitable variation
 - d. At the rear, where seeking 5 storeys, provide awnings to windows
 - e. At the rear, where seeking 5 storeys, consider trellis planting in addition to the proposed to better screen the building from the rear adjoining public park.
8. It is understood that the self-storage component of the development is located at the rear of the site and is proposed to be 5 storeys in building height. It is also acknowledged that this component directly adjoins an existing dwelling house to the east which is 2 storeys tall. The development raises concern about the interface between the sensitive zone and use, and the proposed built form of the self-storage. A small number of floor plans show where the dwelling is sited on the adjoining lot and indicates that there will be conflict between the two structures. Further information is required in order to determine that the height to the self-storage building is able to be supported. Where sufficient information and justification on the height and impacts on sensitive uses cannot be achieved, the structure may have to reduce the height to a compliant level in accordance with AO21, AO22, AO23.1 and Table 9.3.3.3.B of the COMUc.
- a. Submit shadow diagrams to indicate the impact on the adjoining sensitive use on both the longest and shortest day of the year. Diagrams should include 9am, 12pm and 3pm shadows as a minimum.
 - b. Provide sections which show the building height of the self-storage area and the adjoining dwelling house.
 - c. Provide the location of the adjoining dwelling house on all floor plans and elevations.

Carparking

9. According to the submitted Traffic report prepared by Colliers, 144 car parking spaces are required for the development, whilst 41 spaces are being provided (inclusive of loading zones). This is approximately 28.5% of the total number of spaces required for the development and therefore does not comply with PO13 of the Transport, access, parking and servicing code (TAPS). It is acknowledged that the self-storage component at the rear may require less parking spaces than the TAPS code prescribes, however the significant reduction in spaces raises concern for future use of the site. As the site is located within the District centre zone, centre activities which have a higher traffic generation may be able to move into the work stores at the front of the site as 'accepted development'. There is concern that this development does not consider future use of the site that will cause traffic issues and queuing.
- a. It is recommended to review the proposed carparking and provide additional spaces within the development that align closer to the acceptable outcome of 144 spaces.

Setbacks to sensitive uses

10. The development proposes warehousing up to 5 storeys within close proximity to a sensitive zone and therefore doesn't comply with AO20.1 of the Industry code. As well as this, the development does not comply with boundary setback requirements identified in Table 9.3.3.3.C of the COMUc.
- a. It is recommended to review the setback requirements identified in the applicable codes and provide increased setbacks, specifically to the interface of the sensitive uses adjoining the subject site.
11. The proposed development provides a refuse area that adjoins the site boundary of a sensitive use. The submitted information does not show a screened or wholly enclosed structure and the proximity to the adjoining residential use raises concern about the impacts on the privacy, amenity and potential air quality as a result of the location of the refuse area.
- a. Review and amend the location of the refuse area to ensure there are no adverse impacts to the adjoining residential use.

Hours of operation

12. The submitted information advises that the self-storage building will operate 24 hours a day, 7 days a week and that the work stores will maintain operating hours which are considerate of the nearby residential uses. This is not enough information to satisfy either AO1.1 or PO1 of the COMUc.
 - a. Provide further information on the hours of operation. As the use of a work store is unclear, it is likely that hours of operation will be conditioned in order to ensure there are no significant impacts to adjoining sensitive uses.

On-site recreation area

13. The development has not provided an on-site recreation area for staff that delivers a socially, visually and physically amendable work environment in accordance with AO14 of the Industry code.
 - a. Provide amended plans which include an on-site recreation area for staff and includes the following:
 - i. Seating, tables and rubbish bins;
 - ii. Adequate protection from the weather;
 - iii. Safely accessible to all staff
 - iv. Separated and private from public areas; and
 - v. Is located away from noisy or odorous activity.

Barkala Street (ARS)

14. The proposed development includes an Access Restriction Strip (ARS) along Barkala Street and belongs to Brisbane City Council. Landowner's consent is required to be included with the application to ensure the proposed land dedication is able to be provided. Provide the appropriate consent from Council's Asset Management branch for the inclusion of the ARS property for land dedication purposes.

Verge widening

15. A verge widening is required along Waterworks Road frontage and along Barkala Street.
 - a. Provide amended plans in accordance with the Streetscape hierarchy overlay code AO1 that show 3.75m wide verge along Waterworks Road and 2.5m wide verge along Barkala Street.
 - i. In addition to clearly dimensioned verge widths, provide a section through Barkala Street showing the retaining wall located outside the verge. The verge is to have a minimum crossfall of 1:50 from the property boundary to the verge edge. The retaining wall may affect building location and maintenance access around the building.

Noise – Industrial Impacts

16. The proposed use and its location have the potential to impact on the noise amenity of nearby sensitive uses/zones. The applicant therefore needs to demonstrate that an adequate level noise as per the Industry Code can be provided at such locations.
 - a. Submit further information demonstrating that the proposed use can comply with the separation distances as prescribed in AO2.1 – AO2.9 of the *Industry Code*. Where compliance with the separation distances cannot be achieved, the applicant is to submit for approval a Noise Impact Assessment Report prepared in accordance with the *Noise impact assessment planning scheme policy*, demonstrating compliance with PO2 of the Code.

Stormwater Quality – Stormwater Quality Management Plan

17. Submit an electronic copy of the MUSIC model used to develop the proposed stormwater quality management plan for assessment.

Urban Utilities (UU)

Council does not undertake water and sewer assessment of any planning applications. Contact UU on (07) 3432 2200 to discuss any water and sewer issues and whether you are required to submit an application to UU for assessment.

Responding to this request

Your response should include a summary table which outlines any changes to performance outcomes and plans that have resulted from addressing the issues outlined above. The table should also include details of any supporting documentation.

If a response is not provided within the prescribed response period of three (3) months assessment of the application will continue from the day after the day on which the response period would have otherwise ended.

Email your response to DSPlanningSupport@brisbane.qld.gov.au quoting the application reference number A007025195.

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

Yours sincerely



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