

19 May 2026

Our Reference: 25-00845-L3

Chief Executive Officer
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

Attention: Farnoosh Shokofan (Assessment Manager)

Dear Farnoosh

**RE: RESPONSE TO FURTHER ISSUES LETTER
DEVELOPMENT APPLICATION (MCU – MEDIUM IMPACT INDUSTRY)
1028 LYTTON ROAD, MURRARIE QLD 4172
BCC FILE REFERENCE A006928669**

We provide this response to Council's Further Issues letter dated 30 April 2026 and respectfully request assessment of the application continue.

Item 1 – Stormwater Quality

The response to this item is provided by Arcos Group engineering consultants at **Appendix A**.

Item 2 - Use

The application is for Medium impact industry and proposes developing the site with the construction of a building to accommodate tenant(s) to conduct medium impact industry activities that are consistent with the meaning of 'Medium impact industry' as defined in the Planning Regulation 2017.

Whilst it is possible that future internal petitioning could be provided to accommodate multiple tenants, that is not what is proposed and the architectural drawings clearly demonstrate a single tenancy. Should changes to the approved development be required in the future, a change application is likely to be required as provided for in Part 5, Div 2, *Planning Act 2016*.

The spaces Council assumes could accommodate separate tenancies have been designed as flexible ancillary use areas for future tenant requirements because the actual tenant and their specific needs are unknown. These spaces at ground and mezzanine level have been created out of the requirements for fire separation under the BCA. It is evident from the drawings that these spaces do not have separate access and can only be accessed internally from within the building. They may provide either ancillary administration area to directly support the industrial use of the tenant, storage areas out of way of the main floor activity area, or further industry use area should the tenant require. Such arrangement is commonly found in many large industrial buildings of this scale.

As a particular tenant is unknown, the development seeks approval for both Medium impact industry A and Medium impact industry B activities (Table SC1.1.3A, CityPlan) that are anticipated to occur within the Medium Impact Industry C zone (Table 5.5.16, CityPlan).

Prospective tenants that exceed activity thresholds for Medium impact industry would either find the premises unsuitable or need to obtain further development approval in accordance with the requirements of the CityPlan. Council is obligated to impose conditions on compliance and future tenants will be required to assess the relevant activities against the Industry code. The zone code is structured such that these uses are only accepted subject to requirements, which can either be conditioned through this approval or are regulated under the City Plan.

Therefore, it is requested that Council condition the quantity of hazardous goods stored on-site. This is the same way Council assessed and approved the development at 980 Lytton Road, Murarrie (Ref A006523452) in the instance where the tenant was unknown.

The proposal satisfies the particular purpose and overall outcomes of the industry zone code nominated by Council as follows:

- 1.b.ii Grant of approval for medium impact industry use will not compromise the future use of premises for industry activities.
- 4.b The site is zoned Industry (Medium impact industry C precinct). Both the proposed use of the premises is for and approval of the application would be only for industrial uses appropriate to the zone precinct.
- 4.e Approval of the application would not authorise incompatible development, nor is incompatible development proposed.
- 4.f A stand alone office is not proposed.
- 4.g An administrative area that directly supports the industrial use is proposed at mezzanine level, as is anticipated by this Overall Outcome.
- 8.d The proposal does not include nor would approval authorise incompatible development or any of the uses described in this Overall Outcome.

The following responses are provided as requested:

- a) Revised architectural drawings are attached at **Appendix B**. The architectural drawings clearly demonstrate a single tenancy for medium impact industry. A lawful future tenant would comply with the definition for 'medium impact industry' (CityPlan 2014 v35) as has been applied for and would be authorised by the Decision Notice for Medium impact industry and relevant conditions of approval.
- b) Revised architectural drawings SK2011 Issue 08 and SK2013 Issue 08 are attached at **Appendix B** and include annotation of ancillary areas at ground level and mezzanine level that clearly limits the use of those areas to directly support the industrial use of the premises.
- c) N/A

Item 3 – Building Height

Building height is to be assessed against Performance Outcome PO12 Industry code, which seeks to achieve development that:

- a. is of a scale and design which contributes positively to the visual character of the area, especially as seen from the street;*
- b. is easily accessible and legible;*
- c. designs and locates vehicle unloading and outdoor storage areas to be unobtrusive from the street;*
- d. is designed to accommodate the car parking and servicing demands of the wide range of industry and warehouse uses supported in the relevant zone or zone precinct.*

Context

The visual character of the area is informed by land use, built form, landscape elements and streetscape features which are discussed respectively below.

The site is located on Lytton Road approximately 400m to the east of the Gateway Motorway interchange. Land on either side of Lytton Road is zoned for industry use. Lytton Road is an

arterial road and designated primary freight access route that services high volumes of industry and logistics traffic travelling between the Gateway Motorway and the industrial areas of Hemmant, Lytton and the Port of Brisbane.

The site is located between two concrete batching plants on its eastern (Excel Concrete) and western (Q-Crete) boundaries. An existing industrial building is located on the front portion of the site adjoining Lytton Road and the rear boundary adjoins a disused railway corridor. The development footprint is setback 80m from the Lytton Road frontage.

The immediate and surrounding visible landscape elements when viewed from Lytton Road in front of the site include the Gateway Bridge that rises above the treelined horizon, industrial buildings in the foreground on the subject site and adjoining sites and concrete batching plant processing silos that penetrate the skyline either side of the site. Council's development platform reveals that the height of the adjoining approved concrete batching plant silos is 25.172m.

Conspicuous elements in the Lytton Road streetscape in and around the site include streetlight poles, power poles, overhead electricity wires and large traffic control signs as demonstrated in **Figure 1** below. When viewed from Lytton Road, these elements dominate the foreground and in perspective appear taller than the height of the proposed building which sits behind the existing building at the front of the site.



Figure 1: View from Lytton Road directly in front of site.

When travelling eastwards along Lytton Road away from the Gateway Motorway interchange, existing industrial buildings with continuous monotonous walls line the edge of the road and appear imposing and domineering in the streetscape preventing distant views, as demonstrated at **Figure 2** below.



Figure 2: View of site obscured by existing industrial buildings when travelling eastward along Lytton Road from Gateway Motorway interchange.

When travelling westwards along Lytton Road toward the site, the vegetated treeline along the eastern boundary prevents views into the site as demonstrated at **Figure 3** below.



Figure 3: View of site screened behind treeline when travelling westward along Lytton Road from the east.

The development has been designed to provide a modern and visually attractive industrial development for this underutilized site. As illustrated in the architectural drawings, the materials and finishes incorporated into the western façade have been intentionally treated because it is the only side of the building that is publicly visible from a small viewshed travelling eastward along Lytton Road across the adjoining concrete batching plant processing silo and the architectural treatment makes a positive contribution to that view and the visual character of the area.

The southern side of the building is screened from public view by the existing industrial building at the front of the site. The eastern side of the building is screened by the existing treeline that extends along the boundary with the concrete batching plant at 1044 Lytton Road. The northern side of the building adjoins the disused rail corridor and ‘back-of-house’ areas of existing industrial buildings on the northern side of the rail corridor.

Even though it is set back some 80m from the Lytton Road frontage, the architectural treatment provided to the western façade ensures that the appearance of the building contributes positively to the visual character of the area. The proposal provides a modern industrial development that appropriately addresses the topographical constraints of the site and has been seamlessly integrated behind the existing industrial building to ensure the built form does not present as overbearing to the streetscape.

As shown on drawing SK3001 Issue 05 dated 9 May 2026 (**Appendix C**), building height ranges between 15.4m and 17.3m due to the sloping topography of the site. Due to the position of the building at the rear of the site, variation in height exceedance is acceptable in the surrounding context and poses little if any adverse impact to adjoining sites and the broader locality.

Although the building height exceeds Acceptable Outcome AO12.2 of the Industry code (15m), localised circumstances weigh in favour of the proposed height variation in this instance, including the site’s sloping topography, existing buildings on the site, adjoining land use and heights of structures (~25m), landscape elements and streetscape features.

Assessment of Performance Outcome PO12 is provided below.

PO12

Development:

- a) *is of a scale and design which contributes positively to the visual character of the area, especially as seen from the street;*

The visual character and context is documented above. Notwithstanding the building will be obscured from view from the street behind the existing building, materials and finishes have intentionally been incorporated into the western facade that exceed commonly used standard tilt-up concrete panel built form, so that the

	appearance of the building contributes positively to the visual character of the area and the viewshed when travelling eastward along Lytton Road.
b) <i>is easily accessible and legible;</i>	The existing approved access is easily accessible and legible from Lytton Road.
c) <i>designs and locates vehicle unloading and outdoor storage areas to be unobtrusive from the street;</i>	The proposal does not involve outdoor storage areas. Vehicle loading and unloading areas are screened behind the existing building located at the front of the site and are unobtrusive from Lytton Road.
d) <i>is designed to accommodate the car parking and servicing demands of the wide range of industry and warehouse uses supported in the relevant zone or zone precinct</i>	Excess car parking under the building is a consequence of the architectural and engineering requirement to provide a suspended slab for the building on this sloping site and will accommodate the car parking demands for medium impact industry uses that may occupy the premises.

The photomontage previously provided and attached at **Appendix D** clearly demonstrates that the proposed building height has no unacceptable visual impact on the streetscape or surrounding landscape and achieves the requirements of PO12 (a) – (d).

Should you require any further information or clarification, please do not hesitate to contact me.

Yours faithfully



Graham Clegg



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Member, Planning Institute of Australia

Member, Queensland Environmental Law Association