

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

Full name:

Residential address:

Email / postal address for Council response:

Phone, optional:

Signature:

Date: Monday 29th June, 2026

Thank you for the opportunity to lodge our objection to this development application.

Submission

We wish to state our objection to Development Application A007011234 and request , in the strongest terms, that Brisbane City Council refuse the application.

The suburb has an existing Plan – The Gap Neighbourhood Plan. The proposal for development is grossly 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.

I to The Gap in when it was a small community of families who all looked out for one another. have weathered floods on more than one occasion, a 'once in a lifetime' storm in 2008 which still brings anxiety at the sound of approaching bad weather, drought and other disasters and have come through as a community. I brought here to raise our family. We love it here, but what drew us here was its quiet urban character. It is NOT a

place of high rise and high density. It is a place of yards and gardens and the laughter of children. Nor is the piece of land touted for development particularly suitable for building. You may not remember the heights reached in the 1974 floods and how much of Bennetts Road was swallowed by rushing waters, but long term residents of The Gap do.

The issue is not even 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. It will not fit with the environment and will stand out like a sore thumb and a blight on the environment.

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. Previous application for high rise have been made and have failed. We hope that this will receive the same response.

3. Visual dominance and landscape impact

The development would not merely be visually prominent. It would dominate the landscape. In the old days of The Gap, we'd come around the corner after passing the quarry and carry on past Mr Mason's jam factory and we'd be entering our green and leafy retreat, a suburb unlike others – a place of family homes nestled in well kept yards with children playing. We came through the gap in the mountains to be welcomed into an almost village like atmosphere. The proposed building 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. Having lived in this area , I can confidently tell you that the buildings would loom over the trees – entry of green would become an entry of tall buildings overwhelming the green. Council ought to 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. Any 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. It must maintain the green wildlife corridors. Given that it is so close to the creek, there would need to be careful consideration of runoff issues.

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. Flood water in that vicinity comes up very quickly. As member of the community, would not want to be in any accommodation so very close to an area prone to flood. As a resident of The Gap, it has long been considered that Bennett's Road floods when someone forgets to turn off their sprinkler! While it may not truly be this rapid, I have certainly seen more fast flowing flooding in that street than anywhere else in The Gap over years of living here and I imagine this could be terrifying for those who move less quickly than they might once have. Council should not approve the application without comprehensive information about flood storage, overland flow, stormwater discharge, downstream impacts, emergency access and evacuation risks. These MUST be 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 – it also receives traffic from over the mountains from Kenmore and suburbs into Dillon Road and Ferny Grove / Mitchelton / Samford over Settlement Road which then merge onto Waterworks Road . One need only to consider how the retirement village at Keperra Sanctuary, with its dedicated traffic light, negatively impacts traffic flow along Samford Road at peak hours to see what complete folly such a development would be. At the very least it would require additional traffic lights when there are already lights at Coinda St mere metres away. Additionally, the development would add residents, visitors, staff, service vehicles, delivery vehicles, waste collection and emergency vehicles and then of course there would be 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 and feeder streets, pedestrian safety, mobility scooters, public transport and emergency access - school student traffic also requires consideration.

8. Construction disruption

A development of this height and scale would likely create substantial construction impacts, including heavy vehicle movements, traffic disruption, run off into the creek, noise, dust, vibration, staging impacts and road safety concerns. These impacts must be comprehensively assessed before any approval is considered. Again, I would urge caution to the fragile creek environment. The Gap has already seen the loss of lung fish in the Enoggera Reservoir and lower catchments due to careless development and use. Let's not continue down a road of loss, shall we?

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 - this is playing on emotions. 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. 'Egg crate storage' of aging human beings is not compatible with their mental health nor their ambulatory needs to walk and undertake gentle exercise to maintain health and vigor.

10. Unacceptable precedent

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

It is, for these reasons, that I heartily object to Development Application A007011234 and request that Brisbane City Council refuse the application.

I further request that this be treated as a properly made submission and that I be notified of Council's decision in a timely manner.

**Yours sincerely,
Signed electronically:
29 June 2026**