

OUR REF: 6172  
YOUR REF: COM/2024/374

28 February 2025

Chief Executive Officer  
City of Gold Coast  
PO Box 5042  
GOLD COAST MC 9726

Via email: [mail@goldcoast.qld.gov.au](mailto:mail@goldcoast.qld.gov.au)

Attention: Ms. Natasha Sidabutar

Dear Madam,

**RE: RESPONSE TO COUNCIL INFORMATION REQUEST – COM/2024/374**

**AT: 2 HIGHLANDS STREET AND 2 FAIRWAY STREET, STAPYLTON QLD 4207 (LOT 204 AND 205 ON SP316171)**

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Gassman Development Perspectives, on behalf of the Applicant, FPI Queensland Pty Ltd, are pleased to provide the following response to Council's Information Request dated 23 January 2024. The Applicant considers this a full response to the information requested, and requests Council to proceed with their assessment of the development application.

## **1.0 RESPONSE TO INFORMATION REQUEST**

A detailed response to each of the items raised within Council's Information Request is provided below.

### *Planning Assessment*

#### *1. Car Parking*

*As identified within the submitted transport impact assessment, the car parking provision is considerably short of Acceptable Solution AS8.1.1 of the M38 Industrial Estate Place Code. The applicant has provided justification that a Warehouse use would require limited staff less than that of other industrial uses.*

*Given that there is no end user proposed at this time, including a parking provision that would fall short of the requirements of other industrial uses does not facilitate flexible reuse of the built form for future development. Given flexible use of the limited industrial land is highly sought to support the industrial economy, placing physical restrictions by way of a shortfall in car parking is not supported by City officers.*

*The table of development Table A – Yatala Enterprise Area Local Area Plan Table of Development (as modified) – Material change of use identifies Self Assessable land uses within Precinct B (General Impact Business and Industry) including but not limited to the following:*

- Low impact industry*
- Manufacturer's shop*

- *Service industry In accordance with Section 3.8 of the Land Development Guidelines – Change to Ground*

*Given that the above industrial uses are Self Assessable and intended for the site, the justification that the estimated Warehouse car parking requirements are less than that of other industrial uses is considered to conflict with the intent of the Land Use Classification Plan and associated table of development. The justification provided does not meet Performance Criteria PC8. The applicant is requested to amend the current proposal to include car parking provision that allows for flexible industrial use of the site as intended by the M38 Industrial Estate Place Code. This is discussed further in the following Information request items.*

### **Applicant response:**

A response to item 1, the scale of the proposed warehouse is not generally conducive for uses outside of logistics, storage or distribution, which traditionally do not generate a high need for car parking spaces given the limited number of staff required to operate these facilities and low generation of visitors. As such the proposed parking rate generally demonstrates compliance with PC8. However, as above mentioned, other industrial uses falling under Low impact industry or service industry definitions, are considered accepted and could potentially operate within either warehouse. In this instance, the site features ample room for overflow car parking within the hardstand areas of the site as industry/manufacturing nature uses in the building will likely generate smaller quantities of truck movements on site but have a higher staff yield. If such an industrial use were to occupy either tenancy on the subject site, each tenancy is equipped with four roller doors for unloading and loading purposes, and it is unlikely all would be required for regular use. This would allow parking in front of them without negatively impacting on site operations or truck movements. Importantly, the site still features ample space for truck maneuvering throughout and will still allow for entering and exiting the site in a forward gear. Regardless of this, it is important to remember any such development which does not meet the carparking rate will trigger an application to Council, whereby the parking rate would be interrogated based on the new user.

Further to the above, a targeted response justifying the proposed rate of parking has been provided in **Attachment A**, the targeted Traffic Response Letter.

### ***Transport Assessment***

#### ***2. Car Parking***

#### *M38 Industrial Estate Place Code*

##### *Vehicular parking – PC8*

*To comply with AS8.1.1, the proposed development requires 215 off-street car parking spaces. The proposal represents a significant parking shortfall, with only 100 car parking spaces proposed. The information provided in the Transport Impact Assessment does not provide sufficient justification to meet PC8.*

*Given that the end users and specific operations for the proposed development are unknown, the applicant is requested to demonstrate compliance with the prescribed parking rate. Alternatively, suitable and sufficient justification shall be provided to demonstrate that the expected parking demand will be fully accommodated on-site, in accordance with PC8 noting the above identified noncompliance with the Performance Criteria.*

### **Applicant response:**

As stated above, the proposed use generally complies with PC8, providing ample parking considering other potential future users, anticipated due to the size and scale of the development. Further mentioned in the item 1 response, the site is of a size whereby hardstand areas, as well as areas in front of unused roller doors, can be used for parking as necessary. This allows for flexible parking based on site use as requested.

A response to item 2, a targeted response justifying the proposed car parking rate for the development has been provided in **Attachment A**, the targeted Traffic Response Letter.

### 3. Site Access and servicing

*M38 Industrial Estate Place Code*

*Site access – PC43*

*Site servicing – PC55*

*Car Parking, Access and Transport Integration Constraint code*

*Driveways and crossovers – PC18*

*The proposal for vehicle access to be taken from Christensen Road conflicts AS43 and AS55.1 of the Place code, and AS18 of the Constraint code, as follows:*

- *AS43: Vehicular access to the site is designed and constructed in accordance with Council, Department of Main Roads and Austroads standards, and/or the following minimum requirements:
  - f. *where the site has frontage to two roads, access is taken off the secondary/minor road, if possible.**
- *AS55.1: The number of vehicle entry points to a development site is minimised, particularly in areas which have high volumes of pedestrian traffic and on streets with a significant through road function.*
- *AS18: Access to developments with more than one frontage road is via minor roads. Impacts of driveway traffic are concentrated on less busy roads, with traffic distributed to major roads via existing intersections.*

*Given the high-order function of Christensen Road and the proposed access driveway is located off a left-turn slip lane which increases risk of rear-end collisions, to maintain the operation, capacity and safety of Council's road network, direct access to/from Christensen Road is not supported.*

*The proposed vehicle access arrangements shall be consolidated to the Highlands Street frontage (with the exception of 'truck egress' to Homestead Drive). Of note, officers are supportive of separation between truck and passenger car access points (in accordance with the relevant assessment benchmarks), however, internal connectivity shall be provided between car parking areas to reduce the overall number of vehicle access points and to remove vehicle access from Christensen Road.*

#### **Applicant response:**

A response to item 3, a targeted response justifying the use of the Christensen Road crossover has been provided in **Attachment A**, the targeted Traffic Response Letter.

### 4. Loading and Unloading

*M38 Industrial Estate Place Code – PC52, PC53*

*Submit a swept path to demonstrate that a fire truck is able to circulate from Lot 204, to the proposed easement in Lot 205 (and through Lot 205), with all movements achieved in a continuous, forward motion.*

#### **Applicant response:**

A response to item 4, a swept path assessment illustrating fire truck movement has been provided in **Attachment A**.

### 5. Design of car parking areas and car park spaces

*Car Parking, Access and Transport Integration Constraint code – PC3*

*Dimensions, for all car parking and servicing facilities, shall be shown on development drawings (not just on figures within the Transport Impact Assessment). Car parking facilities shall be designed in accordance with the relevant 'User Class' requirements of AS2890.1 (for both staff and visitor use), and surface gradients shall be identified; dimensions shall be shown for all service bays, with notations shown on development drawings to clearly identify service bays (within the building); pedestrian sight triangles shall also be dimensioned, and the relevant notation amended to read: "Pedestrian sight triangles to be kept clear of obstructions to visibility. Low level landscaping permitted to a maximum mature height of 500mm above driveway level."*

**Applicant response:**

A response to item 5, site plans have been amended where necessary to include the detail requested for the carparking spaces, please see **Attachment B**, depicting the Amended Site Plan.

**6. Provision of bicycle parking spaces**

*Car Parking, Access and Transport Integration Constraint code – PC15*

*Section 7.0 of the Transport Impact Assessment states that “The proposed development provides a secured bicycle parking facility, suitable for 10 bicycles, adjacent to the office.” The proposed bicycle facility shall be clearly identified on development drawings.*

**Applicant response:**

A response to item 6, site plans have been amended to show the bicycle parking area on site, please see **Attachment B**.

**Water and Waste Assessment****7. Water Network Capacity**

*A water capacity assessment is required to confirm if any augmentations to Council’s potable water network as a result of the proposed development.*

- a) *A potable water supply network capacity assessment for the proposed development. The capacity of the existing system (considering other existing development approvals) must be assessed, and any required augmentation works shall be identified as a result of the development’s additional water usage. The assessment must adhere to the SEQ Water Supply and Sewerage Design and Construction Code and the Water Supply and Sewerage Infrastructure Plan.*

*Advice Note: The applicant should liaise with Council to obtain the current model for potable water (please contact Uttam Saha, Coordinator Network Planning on telephone (07) 5582 8929)*

**Applicant response:**

A response to item 7, the overarching Preliminary Approval (MIN/2023/64) and subsequent subdivision approval (COM/2020/262) previously assessed the potable water supply network capacities to ensure infrastructure would be adequate enough to service the estate. Such infrastructure has been provided as part of delivery of the lots on which the development is located. The proposed land use aligns with the assumptions of industrial development utilised in these initial servicing assessments. Given the proposed development will operate within the approved estate utilising approved and existing infrastructure, no potable water supply network capacity assessment is required in this instance.

**8. Solid Waste Management**

*Refuse Facilities – PC10*

*Council acknowledges the Transport Impact Assessment report ‘24260’, version 2 dated 16 December 2024 by Rytenskild Traffic Engineering which does not demonstrate how the CoGC front-loading refuse collection vehicle will service the designated refuse storage areas whilst moving unimpeded through the site.*

*The Applicant is therefore requested to demonstrate compliance with AS10.1 of the M38 Industrial Estate Place Code and the ‘Solid Waste Management Policy for New Developments’ by addressing the items below:*

- a. *Ensure sufficient access and clearance for the waste collection vehicles to services the bins by providing swept paths for a waste collection vehicle servicing both warehouses.*
  - i. *Swept path analysis is to be generated by AutoTurn, AutoTrack or similar.*
  - ii. *Plans must demonstrate vehicle specifications including dimensions and the wall-to-wall turning radius of the design service vehicle.*

- iii. *Manoeuvring clearances in accordance with AS2890.2 must be clearly depicted on drawings and demonstrate no obstructions exist for all waste servicing manoeuvres.*
- iv. *Reversing movements on-site are to be kept to a minimum and access to the development from the road is to comply with AS2890.2.*
- b. *Ensure the servicing point is clearly separated from car parking bays, loading bays, footpaths and pedestrian access.*

**Applicant response:**

A response to item 8a), The Targeted Traffic Response, provided in **Attachment A**, illustrates swept path diagrams that show the ability for relevant service vehicle to access and maneuver throughout the site, both entering and exiting in a forward gear.

In response to item 8b) the waste storage/servicing bays are located a significant distance from any parking bays, given the bins are both located centrally to the overall structure/site. They also maintain an adequate separation of approximately five metres from any loading bays nearby.

*Subdivision Engineer*

**9. Amended Access Easement Plan**

*Part of existing building within Lot 205 encroaches into proposed access easement area. However, proposed Access Easement Plan does not include proposed limit of height for proposed access easement area. In addition, the application package does not include sufficient information to confirm that encroached part of existing building achieves to comply with the (minimum) 4.8m vertical clearance for fire trucks (refer to the Fire Hydrant and Vehicle Access Guidelines for Residential, Commercial and Industrial Lots from Queensland Fire and Emergency Services).*

*In this instance, the applicant is requested to submit an amended Access Easement Plan showing annotations (i.e. height information for existing building and proposed limit of height for proposed access easement) at existing structures within proposed access easement. Proposed limit of height for proposed access easement should be complied with the (minimum) 4.8m vertical clearance for fire trucks.*

**Applicant response:**

A response to item 8, the existing structure located on Lot 205 was built in accordance with MCU/2021/638 and does not intersect the proposed easement boundaries. The parcel was designed to ensure that any existing structure did not intersect into the easement. Further any future structures proposed within the easement will require easement consent. Works will not be able to be undertaken until consent is provided. All stakeholders in the easement parcel will be able to provide commentary on any proposed easement structure in the future.

## Summary

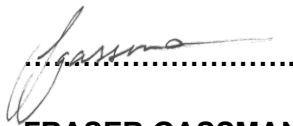
The above information satisfactorily responds and addresses all the matters raised as part of the Information Request dated 23 January 2025 pursuant to section 13.2 and 13.3 of the Development Assessment Rules under the *Planning Act 2016*.

We look forward to a timely and favourable determination of the application.

If you require any further information or have any queries, please contact the undersigned.

Yours faithfully,

**GASSMAN DEVELOPMENT PERSPECTIVES**

A handwritten signature in black ink, appearing to read 'Fraser Gassman', is written over a horizontal dotted line.

**FRASER GASSMAN**  
SENIOR TOWN PLANNER

Enclosed:      Attachment A – Targeted Traffic Response Letter  
                 Attachment B – Amended Site Plan