

OUR REF: 6349
YOUR REF: COM/2025/97

17 June 2025

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

Via email: mail@goldcoast.qld.gov.au

Attention: Ms. Natasha Sidabutar

Dear Madam,

RE: RESPONSE TO COUNCIL INFORMATION REQUEST – COM/2025/97

AT: 1 HIGHLANDS STREET, STAPYLTON QLD 4207 (BAL LOT 505 SP316171)

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 15 May 2025. The Applicant considers this a full response to the information requested, and requests Council to proceed with their assessment of the development application.

Although not directly requested to undergo amendments as a result of this Information Request, the Landscape Intent Plan has been updated to reflect most recent landscape intent for the project. This Amended Landscape Intent Plan has been provided in **Attachment B**.

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. Environmental Management

The subject site is located within both Precinct B and Precinct C of the Land Use Classification and Strategic Plan. Development within Precinct C is required to demonstrate responsiveness to the nearby heavy industrial uses and associated outdoor impacts.

Acceptable Solutions AS9 of the M38 Industrial Estate Place Code requires development within Precinct C to provide an Environmental Management Plan (EMP). The submitted material does not include an EMP. In lieu of an EMP to be approved by Council, the development is required to demonstrate compliance with Performance Criteria PC9 by detailing how negative aspects of the existing amenity of the local area are ameliorated.

Applicant response:

A response to item 1, a code response has been provided in **Table 1** below.

Table 2. Item 3 Targeted Response Table	
Council Item	GDP Response
PC9 The environmental mitigation methods for the development as detailed within the Environmental Management Plan must take into account and seek to ameliorate any negative aspects of the existing amenity of the local area having regard, but not limited to the impact of noise, hours of operation, visual amenity, odour, emissions and dust.	The primary source impacting existing amenity stemming from surrounding uses is almost exclusively the adjacent waste transfer facility to the east of the Vantage Industrial Estate. In order to mitigate against these negative impacts to amenity that may stem from this use, the following design philosophies have been incorporated into the proposed development minimising impact to users: • The majority of the use area is located outside of Precinct C, with over half the warehouse in Precinct B; • The warehouse has been oriented away from the adjacent use; • Office spaces, recreational areas, roller doors and the main entrance have been located to maximise separation from the waste facility; • The site layout has ensured minimised exposure to the negative amenity as the stormwater basin, landscaping, and overflow carparking make up aspects of the development within the precinct C area; • A 20 metre landscape buffer exists between the use and the adjacent waste facility, ameliorating against visual impacts to amenity from the neighbouring facility and providing further separation; and • The portion of the warehouse in Precinct C does not feature any large openings, roller doors or the like, ensuring negative impacts to noise and/or odour are minimised to users within the warehouse.

Transport Assessment**2. Vehicle Parking**

To meet Acceptable solution AS8.1.1 of the M38 Industrial Estate Place code, the proposal is required to provide a minimum of 244 car parking spaces. The submitted drawings show 230 car parking spaces, resulting in a shortfall of 14 spaces. The applicant is invited to investigate providing some additional parallel car parking spaces along the western boundary of the site in the area labelled as 'Heavy Duty Pavement' on the submitted drawings. Should additional car parking spaces be provided within this location, the applicant is to demonstrate that manoeuvring areas for Articulated Vehicles (AV) are not impacted by these spaces and that the relevant clearances are maintained between parked vehicles and AVs in accordance with AS2890.2:2018.

Applicant response:

In response to item 2 from Council, a meeting with Council Officers was held 5 June 2025. During which the following was discussed in depth with Officers and provides justification to the current carparking solution. The proposed carparking rate aligns with a suitable solution adopted by various Council's within Victoria and New South Wales. The solution is provided specifically for large scale, logistical users that better reflects the logistical and often automated nature larger warehouses and a heavier uptake of carparks generated by ancillary offices than the warehouse floor itself.

The reason this matter is of critical importance is driven by the market's expectations for larger warehousing developments. At this larger scale, users do not require such large numbers of

carparking and require optimal use of the subject site for internal warehousing space. Adoption of current prescribed car parking rates would mean more land is required for these warehouses to accommodate car parking that would rarely (if ever) be used. This leads to an inefficient use of land and ultimately a product users will not be willing to pay for.

As an example, Penrith City Council adopt a standard parking rate in their Development Control Plan of 1/300m² of GFA for warehouse, plus 1/40m² of GFA for ancillary office. By way of comparison, a 20,000m² warehouse with 1,000m² ancillary office in Gold Coast would require **217 car spaces** to be compliant with the Planning Scheme. However, adoption of Penrith City Council rates would only require **91 car spaces**.

Other Council's in Victoria have adopted reduced rates through special conditions in the form of waivers applied to large scale logistical warehouses. For example, the City of Casey permits a special car parking waiver for the Applicant in their city that prescribes a 0.5/100m² of GFA for logistical warehouses and ancillary offices. Applied to the example above, this would prescribe 105 carparks for a warehouse and ancillary office of this size.

The Applicant has multiple developments of this nature across Australia and internally, and from first hand experience knows the typical take up of carparking spaces within these developments is for office based staff, with a smaller take up for warehousing staff. It is the Applicant's preference Council look to adopt a prescribed parking rates of 1/300m² of GFA for warehouse, plus 1/40m² of GFA for ancillary office. Importantly, this rate should only be applicable to larger scale, warehousing facilities over 2,000m² of GFA. This rate would not be suitable for smaller scale tenancies or manufacturing based uses if anticipated staff numbers cannot be proven. Further, relaxations of this nature should only be applied to sites whereby fully formed industrial road frontages are present that provide parking aisles either side of the carriage way. Whilst not relied upon, these ensure a form of back up supply of street parking is available if ever required.

To demonstrate how this carparking rate has worked successfully elsewhere, the Applicant has provided a number of case studies for Council's consideration. These examples are all compliant with the suggested car parking rate above. The photos show each warehouse in operation on a work day and demonstrate these warehouses have ample spare car parking spaces available.



Tenant / Industry	NIPPON EXPRESS / logistics
History	Approved as a spec and later occupied by a tenant post approval
Specifications	16,156sqm warehouse with 587sqm office
Car Parking Spaces Provided	67 (complies with DCP)



Tenant / Industry	PIP ANZ / Distributor of workwear, safety wear, and protective apparel
History	Approved as a spec and later occupied by a tenant post approval
Specifications	14,850sqm warehouse with 860sqm office
Car Parking Spaces Provided	72 (complies with DCP)





Tenant / Industry	LOT 13 – CONFIDENTIAL / logistics, engineering, and supply chain solutions
History	Pre-commitment
Specifications	30,000sqm warehouse with 581sqm office
Car Parking Spaces Provided	118 (complies with DCP by ~3 spaces)



The Applicant can also demonstrate suitability of the proposed rate for existing developments within the Vantage Industrial Estate. Table 1 below shows how these existing warehouses would be compliant, noting our previously submitted material show these warehouse car parks with ample capacity during work days.

Warehouse	Warehouse GFA	Office GFA	GC prescribed rate	Approved car parks	Proposed new rate	Staff on site
Lot 120 Speedpanel	4,402m ²	272m ²	54	25	22	4
Lot 122 Wurth	9,143m ²	460m ²	104	57	43	40
Lot 121 PFG	7,990m ²	467m ²	92	20	39	13
Lot 205 Goodyear	23,483m ²	520m ²	246	63	92	40
Lot 121 National Tiles	17,708m ²	989m ²	194	138	85	65
Lot 201 Woolworths	29,950m ²	1,625m ²	311	270	141	240
Lot 301 Proposed Warehouse	25,138m ²	1,060m ²	271	230 * proposed	111	TBC

Lot 301 will provide significant carparking excess than we would anticipate is required by any future user. However, this subject site is unique whereby 122 of these spaces are located in 'surplus' area at the rear of the site. If these were not present, the carparking provided would align closely with the proposed new car parking rate requirements.

As demonstrated above, all but one of the Vantage Industrial Estate warehouses have been delivered with a surplus of staff carparking than required by the users and the proposed car parking rate would not conflict with any of the above examples staff requirements. Importantly, the above warehouses represent a significant diversity in size and car parking rates that cater for a variety of users that the Applicant attracts through long term leases. Whilst the proposed car parking rate would exceed some of the approved car parking numbers of these warehouses, the Applicant would be willing to accept a consistent approach taken to such development moving forward, even though this will most likely result in a modest surplus.

Notwithstanding the above, there will always be those users that require tailored parking solutions, such as the Woolworths (Lot 201) example above that far exceed the proposed car parking rate. The Applicant is unique in their ability to cater for these rarer instances by working with such users early in the process to tailor site layouts around their needs. Such users will often engage in future planning years in advance that enables such specific development to be delivered by organisations like the Applicant and will not be pressured into adapting existing facilities to suit.

3. Design of off-street parking facilities

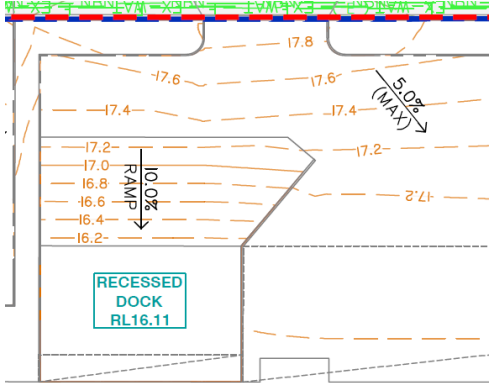
To demonstrate compliance with Acceptable solution and Performance criteria AS3.1/PC 3 of the Car Parking, Access and Transport Integration Constraints code, the applicant is requested to provide amended drawings which address the following:

- a) Show fully dimensioned pedestrian sight triangles on the exit side of each access driveway designed in accordance with Figure 3.4 of AS2890.2:2018. The pedestrian sight triangles must be annotated as follows "Pedestrian sight triangles to be kept clear of all obstructions to visibility. Low level landscaping permitted to a maximum mature height of 500mm above driveway level".
- b) In parking aisles which exceed 6 car parking spaces on each side, provide a turnaround bay to allow vehicles to exit the aisle in a forward gear when all spaces are occupied.
- c) In the northern and southern parking aisles which exceed 100m in length, show humps in accordance with Section 4.9(a) of AS2890.1:2004.
- d) The submitted swept path analysis shows an AV manoeuvring over a recessed loading dock area. The applicant is requested to confirm the grades of the manoeuvring areas and recessed docks to ensure that the AVs are not manoeuvring over a significant drop.
- e) Number all car parking spaces for ease of reference. 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.

Applicant response:

A response to item 3, a targeted response table has been created, see **Table 2** below, seeking to individually respond to each of the sub-items listed above.

Table 2. Item 3 Targeted Response Table	
Council Item	GDP Response
a) Show fully dimensioned pedestrian sight triangles on the exit side of each access driveway designed in accordance with Figure 3.4 of AS2890.2:2018. The pedestrian sight triangles must be annotated as follows "Pedestrian sight triangles to be kept clear of all obstructions to visibility. Low level landscaping permitted to a maximum mature height of 500mm above driveway level".	The architectural plans have been updated to include the sight triangles at all exits and have been annotated accordingly. The amended plans have been provided in Attachment A .

b) In parking aisles which exceed 6 car parking spaces on each side, provide a turnaround bay to allow vehicles to exit the aisle in a forward gear when all spaces are occupied.	The plans have been amended to show a turnaround bay at the end of parking aisles that exceed six metres, without circulation. These turnaround bays have been illustrated in the amended plans have been provided in Attachment A.
c) In the northern and southern parking aisles which exceed 100m in length, show humps in accordance with Section 4.9(a) of AS2890.1:2004.	The proposal plans have been amended to include speed humps designed in accordance with the relevant Australian Standard in parking aisles exceeding 100 metres in length.
d) The submitted swept path analysis shows an AV manoeuvring over a recessed loading dock area. The applicant is requested to confirm the grades of the manoeuvring areas and recessed docks to ensure that the AVs are not manoeuvring over a significant drop.	The swept path analysis provided in the Traffic Impact Assessment Report shows the clearance envelope of the swept path intersecting with the very edge of the recessed dock. Whilst this clearance envelope is the only part of the swept path intersecting, it is important to identify the slope intersected to ensure utmost clarity. As pictured in the extract below (see Appendix F – Engineering Services Report of lodged application), the grade of the site does not change level where the intersection occurs and therefore the area would maintain the same gradual slope where the swept path is located.  Further, the loading docks have been designed in accordance with change in grade criteria in AS2890.2 – Off-street Commercial Vehicle Facilities.
e) Number all car parking spaces for ease of reference. 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.	The proposal plans have been amended to include numbered car parking spaces. These amended plans have been provided in Attachment A.

OPW Engineering

4. Portable Long Service Levy (QLeave)

QLeave has advised that the \$150,000 threshold includes all work associated with the project and is not only limited to the work subject to this OPW. Therefore, under section 73 of the Building and Construction Industry (Portable Long Service Leave) Act 1991, the applicant may be required to pay the portable long service levy for the site.

In accordance with section 77(2) of the abovementioned act, Council cannot issue a development permit for Operational Works unless it has sighted:

- a) An approved form issued by the Authority that clearly shows –
 - i. That the levy or the first instalment of the levy has been paid; or
 - ii. That an exemption from payment of the levy exists in relation to the work; or
 - iii. That an exemption from immediate payment of the levy exists in relation to the work;
- b) Written advice from the Authority stating something mentioned in paragraph (a).

Please provide evidence that section 75 of the Act with respect to payment of the levy has been complied with. If the applicant believes this to be incorrect, please contact QLeave directly on levies@qleave.qld.gov.au or compliance@qleave.qld.gov.au or 1300 753 283.

Applicant response:

A response to item 4 from Council, the QLeave Portable Long Service Leave Notification and Payment Confirmation has been provided in **Attachment C**.

5. Change to ground level and creation of new waterbodies

Treatment to fill and retaining wall – AS13.1 & AS13.2/PC13

Demonstrate that the batters and any retaining walls do not create a negative visual impact on the area.

Specifically, earthworks batters within private property are to have a maximum slope of 1:2 and benching is to be undertaken where any proposed freestanding batter exceeds 2.5m. The applicant is required to provide levels for the batter heights at top and bottom and gradients. Demonstrate that these batters are compliant with Land Development Guidelines Table 3.3 or justify why an alternative is safe and should be acceptable to Council.

Applicant response:

A response to item 5, as indicated on the previously submitted Bulk Earthworks plans, the batters associated with the subject site maintain a maximum 1:2 slope, therefore complying with the Land Development Guidelines.

Summary

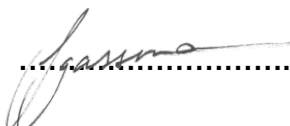
The above information satisfactorily responds and addresses all the matters raised as part of the Information Request dated 15 May 2025 pursuant to section 13.2 and 13.3 of the Development Assessment Rules under the *Planning Act 2016*.

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



FRASER GASSMAN
SENIOR TOWN PLANNER

Enclosed: Attachment A – Amended Proposal Plans
 Attachment B – Amended Landscape Intent Plan
 Attachment C – QLeave Potable Long Service Levy Notification and Payment Confirmation