

ECONOMIC NEED ASSESSMENT

PROPOSED SELF-STORAGE FACILITY
174-176 TYGUM ROAD, WATERFORD WEST

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EXECUTIVE SUMMARY

Black Oak Property Pty Ltd (the applicant) proposes to develop a multi-storey self-storage facility at 174-176 Tygum Road, Waterford West. Current plans indicate that the proposed facility will comprise two separate storage buildings totaling 3,717m² GFA (2,678m² lettable storage area). The subject site is zoned Centre.

Foresight Partners Pty Ltd was engaged to prepare this economic need and impact assessment report.

Main Service Area

A Main Service Area (MSA) was defined for this assessment based on the typical draw distance of a self-storage facility, the road network, and other factors. The MSA extends roughly a 10km radius from the subject site.

Supply Assessment

There are 13 existing self-storage facilities located within the MSA providing an estimated total of 34,434m² of storage floorspace. There are four approved storage facilities in the MSA of varying scale.

Demand Assessment

Compared to the national level, the benchmark provision of storage floorspace per capita is around 1.32 times higher in the Logan LGA. This is expected given the characteristics of the Logan area and fact that the national benchmark ratio includes residents in rural areas where no storage facilities are present.

Economic Impacts

The proposal would not cause any material adverse economic impacts for the following reasons:

- There is a demonstrated undersupply of self-storage floorspace in the MSA (Table 4.3). Therefore, demand is sufficient to support existing and approved facilities as well as the subject proposal.
- Demand would be redirected to the subject proposal from multiple sources thereby decreasing the impact on any one facility.
- Demand at existing facilities in the MSA would also increase due to population growth in areas just beyond the MSA. For example, significant population growth is occurring in Yarrabilba to the south of the MSA, and in Park Ridge and Greenbank to the west. Residents of these areas would patronise storage facilities in the MSA.
- The proposal would not fail nor offend the test under the Planning Scheme's Economic Need and Impact Assessment policy. That is, whether the proposal would impact upon the sales, vitality, viability, and role/function of designated or planned centres (i.e. Centre zones).

Planning Need

A detailed analysis of potential alternative sites was undertaken that revealed a limited market availability and suitability of appropriately zoned sites to respond to a current need for further provision of self-storage facilities.

It is acknowledged that there is vacant suitably zoned land in the Park Ridge area, however it is relevant to note that:

- The proposal would respond to a current and growing need for additional self-storage facilities.
- There is sufficient demand in the MSA to support existing facilities, approved facilities, the subject proposal, and future facilities elsewhere.
- The subject site represents a logical and appropriate location for the use from a market and economic perspective.
- Suitably zoned land in Park Ridge will be developed over a long period and the proposal can respond to a current need.

Summary of Need and Benefits

Need for the proposed development is demonstrated by the following:

- The population of the Main Service Area (**MSA**) is projected to increase from around 201,020 persons in 2024 to around 278,780 persons by 2036.
- Demand for self-storage floorspace is greater at the LGA level than the national level.
- Demand for self-storage floorspace generated by the MSA population is projected to increase from 53,270m² in 2024 to 78,058m² by 2036. This is equivalent to a need for at least 9 additional self-storage facilities (at 2,700m² per facility).
- A comparison of supply and demand indicates a current shortfall of 18,836m² of storage floorspace in the MSA. Even assuming all approved developments proceed, it is expected that a shortage of storage floorspace will remain over the forecast period.
- The proposal would not cause any material adverse economic impacts.
- The subject site is suitable from a commercial market and convenience perspective given its location at the periphery of a Centre zone precinct.
- Self-storage is a quasi-commercial use and not a typical industrial and high employment generating use. Therefore, establishment of the proposal at this site conserves Industry and Mixed-use zoned land for more intensive employment generating uses to support the overarching objectives of these zones and the Planning Scheme overall.
- There are no existing self-storage facilities in the suburb of Waterford West (or Loganlea) the support the needs of local residents.

Community benefits of the proposal include the following:

- The provision of a self-storage facility in the local area where there is no existing facility in Waterford West.
- Construction jobs will be supported during the development phase.
- Enhanced choice, competition, and convenience in storage facilities.
- Improvements to the availability of storage units in a constrained market.

Conclusion

The proposal would respond to a latent unsatisfied demand, improve community well-being, and do so with the absence of any material adverse impacts from a community perspective.

It is concluded that there is a strong need for the proposed development.

1. INTRODUCTION

1.1 Proposed Development

Black Oak Property Pty Ltd (the applicant) proposes to develop a multi-storey self-storage facility at 174-176 Tygum Road, Waterford West. Current plans indicate that the proposed facility will comprise two separate storage buildings totaling 3,717m² GFA (2,678m² lettable storage area).

1.2 Subject Site

The 2,612m² subject site is located at 174-176 Tygum Road, Waterford West, and is described as Lot 46 RP106985. It is zoned Centre under the Logan City Council Planning Scheme and is currently improved by a residential dwelling.

The subject site is adjacent to Waterford Plaza Shopping Centre which comprises a Coles supermarket, childcare centre, a chemist and several food and drink outlets. Other uses proximate to the subject site include another childcare centre, pub and liquor store, state school and retirement community.

Figure 1.1 shows an aerial view of the subject site.

1.3 Purpose of Report and Methodology

Black Oak Property Pty Ltd commissioned Foresight Partners Pty Ltd to prepare this economic need and impact assessment. The primary objectives of this assessment are to:

- Assess the levels of supply and demand for self-storage facilities in the local area; and
- Assess the economic, community, and planning need for the proposal, in consideration of Council's comments made during the pre-lodgement meeting associated with relevant matters in the assessment of Development Applications.

In preparing this report, a number of investigations were undertaken. These included:

- Analysis and mapping of the supply of existing self-storage facilities;
- Investigation of proposed and approved self-storage facilities;
- Definition and mapping of a main service area (MSA);
- Forecast population in the defined main service area;
- Extraction and analysis of socio-economic characteristics of the MSA;
- Discussion of key market segments and trends for self-storage;
- Assessment of demand for self-storage floorspace within the MSA;
- Comparison of demand and supply to evaluate economic need; and

- assessment of the community need for, and benefits of, the proposal.

These investigations form the basis of this economic need and impact assessment.

Figure 1.1: Subject Site and Surroundings



2. SERVICE AREA ANALYSIS

2.1 Self-Storage Market Overview

Self-storage facilities provide secure rentable space for persons or organisations to store physical property, typically offered as storage units (or vehicle storage) in sizes ranging from small lockers to large sheds. Storage facilities represent a ‘destination’ use – that is, it would be uncommon for visitors of storage facilities to combine their visit with other retail or commercial destinations.

The self-storage sector enjoyed its most successful year in its history in 2021, with Urbis reporting that all self-storage markets recorded average revenue growth in excess of 4%¹. This success is underpinned by consumer demand, which is driven by higher rental occupancy rates, rising urbanisation, downsizing trends, and an ageing population.

As a result of this success, self-storage facility occupancy rates are consistently high. Self-storage facilities in the Brisbane Inner and Brisbane Outer zones reported an estimated occupancy rate of 92.3% and 94.4% respectively – among the highest in Australia.

New and emerging products/services in the self-storage sector include:

Technologically compatible storage: self-storage facilities that provide access to units through smartphone apps are emerging, a relevant example of which includes a storage facility in Hendra with Bluetooth compatibility.

Specialty storage: consumer preferences have stimulated industry operators to develop specific storage options, such as wine cellar storage, safety deposit boxes, vehicle storage, and climate-controlled storage.

Mobile self-storage units: Mobile self-storage units are expected to account for a larger share of market revenue over the next five years, as consumers seek increasing ease of access to, and assistance with, storage options. It is noted that the demand assessment in this report is distinct from mobile self-storage units.

These trends generally suggest growth in the industry and greater demand for new and modern facilities such as the subject proposal.

2.2 Main Service Area

A Main Service Area (**MSA**) was defined to represent the area from which a self-storage facility at the subject site would likely draw much of its customer base.

Several factors influenced the geographic extent of the defined MSA, including:

- The likely characteristics, function, and attraction of the proposed development at the subject site;
- The proximity of the subject site to local residents and businesses;

¹ Urbis Storage Index, December 2021.

- The characteristics and proximity of existing and future self-storage facilities;
- The ease of access to the subject site by car, travel patterns, and natural and man-made barriers to movement, such as topographic features and the road network; and
- Australian Statistical Geography Standard (ASGS) boundaries for which ABS Census data is available.

Figure 2.1 shows the defined MSA and the supply of existing self-storage facilities. The defined MSA includes the SA2s (Statistical Area 2) of:

- | | |
|---------------------------------|---|
| • Beenleigh | • Waterford West |
| • Edens Landing - Holmview | • Kingston (Qld) |
| • Mount Warren Park | • Logan Central |
| • Wolffdene - Bahrs Scrub | • Eagleby |
| • Crestmead | • Loganholme - Tanah Merah |
| • Chambers Flat - Logan Reserve | • Shailer Park |
| • Marsden | • Cornubia - Carbrook |
| • Logan Village | • Part of Boronia Heights – Park Ridge SA2. |
| • Bethania - Waterford | |
| • Loganlea | |

The MSA generally encompasses areas within around a 10km radius as this is the typical distance self-storage users would expect to travel. It extends slightly further than 10km to the south due to the lack of storage facilities in this area and the typical north-bound travel patterns of these residents to access employment, retail, and services.

2.3 Population and Demographics

2.3.1 Population Projections

Table 2.1 sets out the estimated resident population and households in the Main Service Area (MSA) between 2016 and 2036.

MSA population projections are Foresight Partners’ estimates based on Queensland Government Statistician’s Office (QGSO) high series projections by LGA (2023 edition) rebased with more recent ABS population estimates by SA2 at June 2023. It is noted that the QGSO high series population projections for the Logan LGA are below the population projections presented in the SEQ Regional Plan 2023 Update to 2046 (p51) and therefore may be conservative.

High series estimates for SA2s are not produced by QGSO but were estimated based on the proportion of the LGA population in each SA2 under the medium series projections, applied to the LGA ‘high series’ projections produced by QGSO. The underlying 5-year

growth rate for each SA2 in the MSA was then utilised to forecast the MSA population while considering the latest ABS population estimates (at June 2023).

In June 2024, it is estimated that the MSA population will be around 201,020 persons. From 2024 to 2036, it is projected that the population of the MSA will increase rapidly to 278,780 persons, representing an increase of 77,760 persons (an average increase of 6,480 persons per annum).

The MSA is characterised as an area with strong population growth, having an average annual growth rate (2.76% from 2024-36) well-above the Queensland rate (1.42% from 2024-36)².

Table 2.1: Projected Population, Main Service Area, 2016 to 2036

	2016	2021	2024	2027	2030	2033	2036	Incr. 2024- 2036	AAGR 2024- 2036
Population	162,615	182,120	201,020	218,610	238,260	257,855	278,780	77,760	2.76%
Incr. p.a.		3,901	6,300	5,863	6,550	6,532	6,975		

Source: Foresight Partners estimates based on QGSO Population Projections high series 2023 edition by LGA, rebased with ABS ERP at June 2022-23 (latest). AAGR = average annual growth rate.

2.3.2 Socio-Economic Characteristics

Selected socio-economic characteristics of residents and households in the MSA as at the 2021 Census, as well as those for the Logan LGA and Queensland benchmarks, are set out in Appendix 1.

Key insights include:

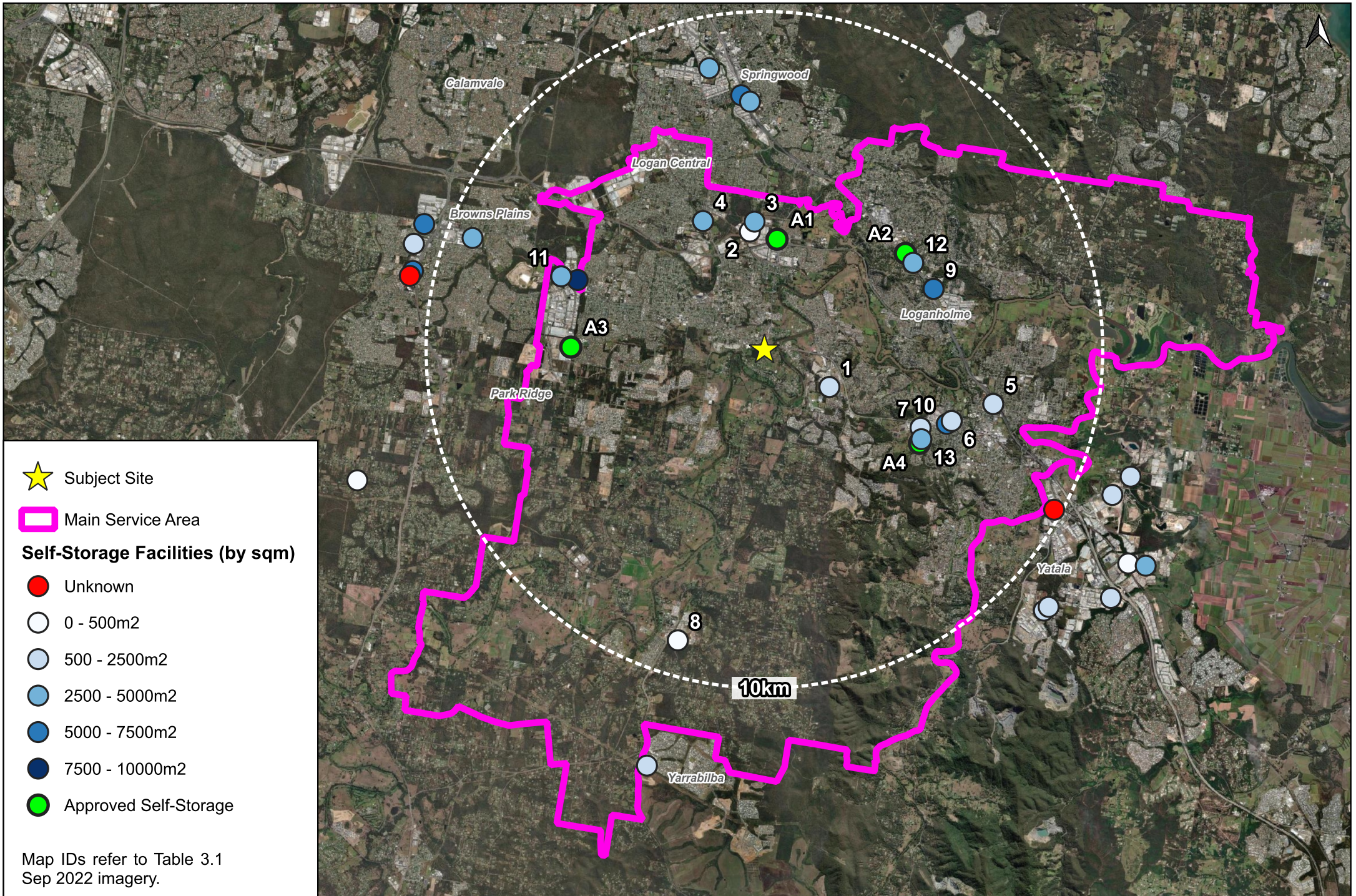
- The MSA had a younger age profile compared to Logan LGA and Queensland. The average age in the MSA was 35.7 years compared to 36 years in Logan LGA and 39.3 years in Queensland.
- The MSA had a slightly lower labour force participation rate (63.3%) and average number of employed persons per household (1.27 persons) compared to the Logan LGA (65.4% and 1.35 persons).
- Average household income in the MSA (\$107,223) was slightly below the Logan LGA (\$113,532) and Queensland level (\$123,035).
- The proportion of households residing in semi-detached dwellings (townhouses) and units in the MSA (12.7% and 4%) was slightly higher than the Logan LGA level (11.8% and 2.7%).

² QLD AAGR via QGSO medium series projections rebased with 2023 ABS ERP.

- The proportion of households with mortgages (36.3%) was slightly lower than the Logan LGA level (40.7%). While the proportion of renting households (39.8%) was greater than the Logan LGA level (35.2%).
- Couples with children were the most common household type in the MSA (31.7% of households), but less prevalent compared to Logan LGA (34.4%).

Based on these characteristics, it is concluded that the MSA is predominately characterised by working families and couples. MSA demand for self-storage facilities is expected to be around the Logan LGA level.

Figure 2.1: Defined Main Service Area and Supply of Self-Storage Facilities



3. SUPPLY ASSESSMENT

3.1 Existing Self-Storage Facilities

Table 3.1 sets out the existing supply of self-storage facilities in the defined MSA and Figure 2.1 (previous section) shows their locations. Key insights include:

- There are 13 existing self-storage facilities within the MSA.
- The largest facilities are Loxon Storage Loganholme (formerly Fort Knox) and Storage King Beenleigh.
- Royal Wolf Shipping Containers Meadowbrook uniquely comprises approximately 250 shipping containers on a 10,126m² site.
- Big Boys Toy Storage Pty Ltd is primarily a vehicle, caravan, and boat storage facility but also provides a small amount of self-storage (~250m²). This assessment focuses on self-storage units rather than vehicle storage.
- There are other storage facilities beyond the MSA that would primarily serve areas further afield.

3.2 Proposed and Approved Facilities

Searches of Logan City Council's PD Hub revealed the following relevant Development Applications:

- **Map ID A1:** A Development Application (MCUC/21/2022) for a four-building self-storage facility (Kennard's), located at 57-67 Eilerslie Road, Meadowbrook (within the MSA) was approved in September 2022. The self-storage facility will span 21,290m² GFA around 19,200m² of which we estimate to be net storage area. Plans show four separate buildings which represent four distinct stages. Aerial imagery shows construction has not yet begun (May 2023).
- **Map ID A2:** A Development Application (MCUC/98/2021) for National Storage Loganholme located at 3930 Pacific Hwy, Loganholme (within the MSA) was approved in April 2022. National Storage Loganholme will be a three-storey self-storage facility with a storage area of 6,237m² and 524 storage units.
- **Map ID A3:** A Development Application (MCUC/182/2022) for a self-storage facility at 154-162 Clarke Road, Crestmead was approved in January 2023. The approved facility is set to provide 485 storage units totalling around 6,200m² storage area. This development is located within the MSA.
- **Map ID A4:** A DA (MCUC/36/2023) was approved over 10-14 Frank Heck Close, Beenleigh in September 2023. This development includes a 99-unit self-storage facility totalling 1,188m² storage area.

Table 3.1: Supply of Existing Self-Storage Facilities

Map ID	Name	Address	Unit Sizes	Est. Storage Unit Area (m ²)
1	Bethania Mini Storage	81 High Rd, Bethania	n.a.	1,000
2	Big Boys Toy Storage Pty Ltd	13/23 Badu Ct, Meadowbrook	n.a.	250
3	Royal Wolf Shipping Containers Meadowbrook	17/23 Beal St, Meadowbrook	14m2	3,600
4	Storage King Kingston	475 Kingston Rd, Kingston	2m2 - 25m2	4,170
5	A1 Budget: Self Storage Brisbane	8 City Rd, Beenleigh	n.a.	1,200
6	Beenleigh Mini Storage	5/1 Thorsborne St, Beenleigh	n.a.	1,200
7	Beenleigh Self Storage	105 Harburg Dr, Beenleigh	3m2 - 18m2	1,500
8	Logan Village Self Storage Sheds	63 Centenary Pl, Logan Village	9m2-18m2	440
9	Loxon Storage Loganholme	4032 Pacific Hwy, Loganholme	1m2-18m2	5,500
10	Storage King Beenleigh	29 Logan River Rd, Beenleigh	1m2-44m2	6,000
11	Storage King Crestmead	38-40 Calcium Ct, Crestmead	1m2-44m3	4,000
12	Storage King Loganholme	3960 Pacific Hwy, Loganholme	2m2 - 25m2	3,000
13	Swift Storage - Beenleigh	70 Harburg Dr, Beenleigh	4.5m2 - 41.25m2	2,574
	Subtotal			34,434

Source: Google Maps, Self Storage Association of Australasia, submitted plans via Logan City Council PD Hub.

4. DEMAND

4.1 Sources of Demand

There are several sources of potential demand for a self-storage facility at the subject site. These are detailed below.

4.1.1 Domestic / Resident Demand

The current and future resident population of the MSA would likely represent a significant portion of demand for self-storage units in the local area (and at the subject development). Levels of demand from MSA residents are likely to vary based on socio-economic factors (e.g. age, income, household size, tenancy type, migration patterns, and proclivity to move).

Around 62.8% of total demand for self-storage facilities in Australia is attributed to resident demand³. Items stored by a resident population are likely to include furniture, as well as documents and sentimental items that are accessed infrequently. Domestic storage is typically required over the medium to long term.

In our opinion, MSA residents would exhibit demand for self-storage facilities higher than the national average, as discussed later in this Section.

4.1.2 Business Demand

A significant proportion (37.2%) of demand for self-storage in Australia is reported to originate from businesses³. These businesses are typically characterised by small to medium sized firms that do not require significant storage or warehouse areas but need easy access to limited off-site stock/documents with flexible occupancy duration.

Table 4.1 sets out the number of businesses in the MSA by industry sector as at June 2023.

There are a total of 4,326 businesses in the MSA as at June 2023, of which 1,379 (31.9%) are employing. Construction businesses are the most common type of business in the MSA (comprising 24% of all businesses) followed by Transport, Postal and Warehousing (22%) and Professional, Scientific and Technical Services (7%).

Based on the distribution of businesses by industry type in the MSA and the overall nature of the area, it is estimated that around 10-20% of total storage area demand would be attributed to businesses.

The primary market for the proposal is expected to be domestic users.

³ IBISWorld Specialised Industry Report OD5494: Self-Storage Services in Australia, December 2022.

Table 4.1: Number of Businesses in Main Trade Area by Industry, June 2023

Industry Sector	Non employing	1-4 Employees	5-19 Employees	20-199 Employees	200+ Employees	Total Businesses
Agriculture, Forestry and Fishing	120	31	9	0	0	159
Mining	6	6	0	3	0	15
Manufacturing	295	165	116	59	0	641
Electricity, Gas, Water and Waste Services	28	9	0	3	0	51
Construction	1,870	961	224	54	0	3,108
Wholesale Trade	192	124	61	21	0	396
Retail Trade	402	218	107	20	0	753
Accommodation and Food Services	113	142	84	24	0	363
Transport, Postal and Warehousing	1,321	300	40	12	3	1,681
Information Media and Telecommunications	55	25	5	0	0	90
Financial and Insurance Services	204	79	16	3	0	307
Rental, Hiring and Real Estate Services	769	126	49	12	3	957
Professional, Scientific and Technical Services	591	362	84	16	0	1,051
Administrative and Support Services	448	167	53	30	3	699
Public Administration and Safety	36	15	3	6	0	59
Education and Training	98	35	23	6	0	162
Health Care and Social Assistance	367	171	83	24	6	652
Arts and Recreation Services	102	34	13	6	0	162
Other Services	387	286	66	8	0	752
Currently Unknown	6	0	3	0	0	13
Total	7,410	3,256	1,039	307	15	12,071

Source: ABS Count of Australian Businesses, including Entries and Exits (June 2023). Sum of total businesses may not add to total column due to randomly implemented variance by the ABS for privacy and security reasons. Data is collected by SA2 therefore this excludes businesses in MSA within part of Boronia Heights – Park Ridge SA2.

4.2 Demand for Self-Storage

4.2.1 Self-Storage Facility Demand

In 2022, there were around 1,693 self-storage facilities in Australia⁴. Given the 2022 estimated resident population of just under 26 million people (ABS), there is an average of around 15,345 persons per self-storage facility at the national level. At the Queensland level, there is an average of 13,480 persons per self-storage facility (IBISWorld Dec 2022).

Applying the Queensland provision rate to the MSA population yields an indicative demand for around 16 storage facilities in 2027, compared to a current supply of 14 facilities.

However, it is noted that demand in the MSA is likely higher than indicated given that the benchmark provision includes the Australian population in rural areas where there are no (or minimal) self-storage facilities. This implies that the average persons per facility in urban/metropolitan areas would be lower (i.e. demand would be higher).

Furthermore, storage facilities vary substantially in size, therefore it is appropriate to consider the number of storage units or floorspace at each facility.

4.2.2 Self-Storage Floorspace Demand

Storage floorspace demand refers to the demand for net self-storage area.

Industry data suggests a national average demand of 0.2m² per capita⁴. To evaluate demand in the Logan LGA, an analysis of the provision of self-storage floorspace per capita was undertaken.

Our analysis indicated that:

- There is an existing supply of around 100,000m² of self-storage floorspace in the Logan LGA. This is based on data from the SSAA and Foresight Partners' estimates.
- Using the June 2023 ABS population estimate of 377,773 persons for the Logan LGA, this results in a benchmark demand of 0.265m² of storage floorspace per capita.
- This is around 1.32 times greater than the benchmark demand reported at the national level (0.2m² per capita). This is considered rational given that Logan LGA is a rapidly growing area with young family households, many of which reside in small and rented properties.
- If approved developments are considered in the LGA level analysis, the benchmark demand metric would be inflated to at least 0.40m² of storage floorspace per capita, or around 2 times the reported national average.

⁴ Self Storage Association of Australasia State of the Industry report (2022).

- For this assessment, we have adopted a demand rate of 0.265m² at 2024, increasing to 0.28m² by 2036 to reflect industry trends, approved developments, and the trend of smaller housing lots.

Informed by this analysis, Table 4.2 sets out demand for self-storage floorspace in the MSA.

Based on the adopted demand rate of 0.265m² per capita at 2024, it is estimated that the MSA population generates demand for around 53,270m² of storage floorspace in 2024. This is expected to increase to demand for around 78,058m² by 2036.

Demand growth is expected to be significant commensurate with rapid population growth in the defined MSA, representing demand for an additional 2,066m² of storage floorspace per annum (average from 2024-36).

Table 4.2: Demand for Self-Storage Floorspace, Main Service Area, 2024 to 2036

	2024	2027	2030	2033	2036
MSA Population	201,020	218,610	238,260	257,855	278,780
Floorspace Demand per Capita (m2)	0.265	0.269	0.273	0.276	0.280
Floorspace Demand (m2)	53,270	58,751	64,926	71,232	78,058

Source: Table 2.1, Foresight Partners. Figures may not add due to rounding.

4.3 Supply and Demand Comparison

Considering the estimated supply and demand of storage floorspace in the MSA, there is a current undersupply of around 18,836m² of storage floorspace (Table 4.3). This is significant and represents a community disbenefit.

Assuming the approved developments at 3930 Pacific Highway, 154-162 Clarke Road, and 10-14 Frank Heck Close are established by 2027 (refer to Section 3.2), there would still be a shortfall of around 10,692m² of storage floorspace. Even assuming the major staged development at 57-67 Ellerslie Road is fully developed by 2033, there will still be a shortfall of storage floorspace.

Based on this analysis, it is concluded that there is an economic need for substantial additional self-storage floorspace in the MSA now and in the future.

Table 4.3: Floorspace Supply-Demand Comparison, Main Service Area, 2024 to 2036

	2024	2027	2030	2033	2036
Floorspace Demand (m ²)	53,270	58,751	64,926	71,232	78,058
Estimated Floorspace Supply (m ²)	34,434	48,059	57,659	67,259	67,259
Shortfall Without Proposal (m²)	-18,836	-10,692	-7,267	-3,973	-10,799

Source: Table 3.1, Table 4.2, Section 3.2. Assumes approved developments at 3930 Pacific Highway, 154-162 Clarke Road, 10-14 Frank Heck Close are established by 2027 and approved staged development at 57-67 Ellerslie Road is 50% developed by 2030 and fully developed by 2033.

5. ECONOMIC IMPACTS AND PLANNING NEED

5.1 Economic Impacts

Economic impacts are typically measured as dollar impacts redirected from one centre to another and discussed in terms of a centre's viability and function. However, the proposal is a quasi-commercial use with income based on a monthly or annual agreement rather than typical retail sales incurred on a daily basis.

The proposal would not cause any material adverse economic impacts for the following reasons:

- There is a demonstrated undersupply of self-storage floorspace in the MSA (Table 4.3). Therefore, demand is sufficient to support existing and approved facilities as well as the subject proposal.
- Demand would be redirected to the subject proposal from multiple sources thereby decreasing the impact on any one facility.
- Demand at existing facilities in the MSA would also increase due to population growth in areas just beyond the MSA. For example, significant population growth is occurring in Yarrabilba to the south of the MSA, and in Park Ridge and Greenbank to the west. Residents of these areas would patronise storage facilities in the MSA.

The test under the Planning Scheme's Economic Need and Impact Assessment policy (SC 6.2.2) is of a new development's impact upon the sales, vitality, viability, and role/function of designated or planned centres (i.e. Centre zones).

For the reasons outlined above, the proposed development would not offend the key planning principles outlined in the Scheme in relation to economic impacts.

5.2 Planning Need

Planning need refers to the lack of vacant/available suitably zoned sites that could accommodate the proposed use. According to the Logan Planning Scheme Tables of Assessment, zones suitable for a Warehouse use (i.e. where it is Code Assessable) include:

- Industry zones;
- Mixed-use zone where not in the retail/commerce precinct; and
- Specialised Centre zone where in the highway business precinct or Underwood business precinct.

To address planning need for the proposal, an assessment of suitably zoned under-utilised and vacant sites, was undertaken (Appendix 2). These sites were assessed in terms of their availability and suitability to accommodate a self-storage facility.

Potential alternative sites were reviewed in terms of site area (greater than 2,500m²), market availability, whether there is an approved or proposed Development Application, flooding risk (low, medium or high risk and site coverage) and potential environmental constraints (OM-02.00 Biodiversity areas trigger, OM-2.04 Matters of state and local significance).

Key findings of this analysis are summarised below:

- A total of 60 potential alternative sites were identified and assessed.
- 27 potential alternative sites had approved Development Applications and one potential alternative site had a proposed Development Application.
- 12 sites are flood affected to varying degrees.
- 21 sites have potential environmental constraints.
- Only two sites were available to the market as at April 2024.
- Our analysis indicates a limited market availability and suitability of appropriately zoned sites to respond to a current need for additional self-storage facilities.

Other key planning need considerations include the following:

- It is acknowledged that there is a significant provision of undeveloped Industry and Mixed-use zoned land in the Park Ridge area. Vacant parcels in this area are generally far larger than required by a self-storage facility (although potential future subdivisions are acknowledged).
- It is expected this land will be developed over a long period of time and will primarily support the needs of the future population in Park Ridge and Greenbank. This area is located at the periphery of the Main Service Area and future opportunities for self-storage facilities in this area would not be extinguished by the subject proposal. The subject proposal is needed to respond to a current shortfall and need.

6. SUMMARY OF NEED AND BENEFITS

Need for the proposed development is demonstrated by the following:

- The population of the Main Service Area (**MSA**) is projected to increase from around 201,020 persons in 2024 to around 278,780 persons by 2036.
- Demand for self-storage floorspace is greater at the LGA level than the national level.
- Demand for self-storage floorspace generated by the MSA population is projected to increase from 53,270m² in 2024 to 78,058m² by 2036. This is equivalent to a need for at least 9 additional self-storage facilities (at 2,700m² per facility).
- A comparison of supply and demand indicates a current shortfall of 18,836m² of storage floorspace in the MSA. Even assuming all approved developments proceed, it is expected that a shortage of storage floorspace will remain over the forecast period.
- The proposal would not cause any material adverse economic impacts for the following reasons:
 - There is a demonstrated undersupply of self-storage floorspace in the MSA. Therefore, demand is sufficient to support existing and approved facilities as well as the subject proposal.
 - Demand would be redirected to the subject proposal from multiple sources thereby decreasing the impact on any one facility.
 - Demand at existing facilities in the MSA would also increase due to population growth in areas just beyond the MSA.
 - Annual demand growth equates to an additional 2,066m² of storage area per annum (2024-2036), therefore the subject facility would only represent the equivalent of 1.3 years of demand.
 - The level of demand growth is such that there will be ample opportunities for the establishment of other self-storage facilities elsewhere which would not be prejudiced by the proposed development.
- The subject site is suitable from a commercial market and convenience perspective given its location at the periphery of a Centre zone precinct.
- Self-storage is a quasi-commercial use and not a typical industrial and high employment generating use. Therefore, establishment of the proposal at this site conserves Industry and Mixed-use zoned land for more intensive employment generating uses to support the overarching objectives of these zones and the Planning Scheme overall.
- There are no existing self-storage facilities in the suburb of Waterford West (or Loganlea) the support the needs of local residents.

Community benefits of the proposal include the following:

- The provision of a self-storage facility in the local area where there is no existing facility in Waterford West.
- Construction jobs will be supported during the development phase.
- Enhanced choice, competition, and convenience in storage facilities.
- Improvements to the availability of storage units in a constrained market.

6.1 Conclusion

The proposal would respond to a latent unsatisfied demand, improve community well-being, and do so with the absence of any material adverse impacts from a community perspective.

It is concluded that there is a strong need for the proposed development.

APPENDICES

Appendix 1: Selected Socio-Economic Characteristics, MSA, 2021

	MSA	Logan LGA	QLD
Age (% residents)			
0-9 (Gen Alpha)	14.8	14.9	12.1
10-24 (Gen Z)	21.2	20.9	19.0
25-39 (Millennials/Gen Y)	22.0	21.7	20.5
40-54 (Gen X)	18.1	18.8	19.5
55-74 (Baby Boomers)	18.6	18.6	21.7
75+ (Interwar Gen)	5.4	5.2	7.2
Average Age (Years)	35.7	36.0	39.3
Employment (%)			
In labour force	63.3	65.4	65.8
Unemployed	7.6	7.0	5.4
White collar occupations	58.4	59.6	68.8
Employed per household (persons)	1.27	1.35	1.31
Household Income (% households)			
Average (\$2023 values)	\$107,223	\$113,532	\$123,035
Dwelling Structure (% households)			
Detached	82.9	85.1	75.0
Semi-detached	12.7	11.8	11.7
Flats/units	4.0	2.7	12.5
Other structure	0.4	0.3	0.7
Dwelling Tenure (% households)			
Owned	23.0	23.0	29.5
Purchasing	36.3	40.7	35.0
Renting	39.8	35.2	33.6
Mobility (% households)			
No car	5.8	4.8	5.8
1 Car	34.3	31.5	35.8
2 or more cars	59.9	63.6	58.4
Avg. Vehicles per Household (no.)	1.86	1.94	1.80
Education (% persons Aged 20+)			
Bachelors Degree	9.5	10.7	16.2
Grad Dip/Grad Cert	1.3	1.6	2.4
Postgraduate Degree	2.4	2.8	5.1
Family Type (% households)			
Couples with Children	31.7	34.4	29.3
Couples without Children	24.7	25.0	28.6
Single Parent Household	16.4	15.9	12.0
Lone Person Household	22.3	20.2	24.7
Group/Other Household	4.9	4.6	5.5
Avg. Household Size (persons)	2.80	2.85	2.53

Source: ABS Census 2021.

Appendix 2: Assessment of Selected Vacant or Under-utilised Potential Alternative Sites, Within MSA

Lot Plan	Zoning	Site Area (m2)	Address	Relevant Development Application*	DA Proposed/ Approved	Market Availability	Flood Affected	Potential Environmental Constraints	Notes**	Conclusion
68RP811561	Mixed-use	22,960	205 Bardon Road	MCUC/62/2023	Approved				Appears occupied by a structure/dwelling.	Unavailable.
2SP324264	Mixed-use	18,600	48-56 Gilmore Road	MCUC/16/2019	Approved				Occupied by dwelling	Unavailable.
43RP45530	Mixed-use	20,580	109 Bardon Road	MCUC/63/2022	Approved					Unavailable.
2RP89191	Mixed-use	10,310	97 Bardon Road	MCUC/75/2022	Approved					Unavailable.
1RP89191	Mixed-use	10,270	46 Gilmore Road	MCUC/36/2022	Approved					Unavailable.
900SP174479	Mixed-use	6,277	370-396 Wembley Road	none		Off market	✓	✓	Substantially constrained by environmental and flooding overlays.	Unsuitable.
901SP174479	Mixed-use	4,707	420-430 Wembley Road	none		Off market	✓	✓	Substantially constrained by environmental and flooding overlays.	Unsuitable.
902SP174482	Mixed-use	2,735	432-438 Wembley Road	none		Off market	✓	✓	Substantially constrained by environmental and flooding overlays.	Unsuitable.
2SP295808	Mixed-use	5,312	398-418 Wembley Road	COM/41/2015	Approved	Off market	✓	✓	Substantially constrained by environmental and flooding overlays.	Unsuitable.
18SP324272	Low Impact Industry	10,370	231 Gilmore Road	none		Off market			Substantially constrained by environmental overlays.	Likely unsuitable and unavailable.
1SP169089	Low Impact Industry	10,600	2-10 Arshad Drive	none					Owned by State Government.	Unavailable.
6SP180591	Low Impact Industry	43,800	19-27 Pagewood Street	none					Owned by State Government.	Unavailable.
15SP287816	Low Impact Industry	6,480	176-180 Clarke Road, Crestmead	MCUC/29/2021	Approved	Off Market			<ul style="list-style-type: none"> Approved DA. Not available to the market. 	Unavailable.

Lot Plan	Zoning	Site Area (m2)	Address	Relevant Development Application*	DA Proposed/ Approved	Market Availability	Flood Affected	Potential Environmental Constraints	Notes**	Conclusion
136RP109253, 24SL7387, 23SL7534, 10SP306671,	Specialised Centre	12,338 total	3978-3982, 3984 Pacific Highway, Loganholme	MCUC/71/2021	Refused	Off Market			<ul style="list-style-type: none"> Owned by State Government. Not available to the market. 	Unavailable.
1SP137525	Specialised Centre	16,242	4002-4004 Pacific Highway, Loganholme	None		Off Market			<ul style="list-style-type: none"> Site of proposed park'n'ride facility. Not available to the market. 	Unavailable.
7SP208838	Mixed-use	2,498	16-20 Frank Heck Close, Beenleigh	MCUC/42/2022	Approved	Off Market			<ul style="list-style-type: none"> Approved DA. Not available to the market. 	Unavailable.
6SP208838	Mixed-use	2,500	10-14 Frank Heck Close, Beenleigh	MCUC/36/2023	Approved	Off Market			<ul style="list-style-type: none"> Approved DA. Not available to the market. 	Unavailable.
21SP236607	Low Impact Industry	4,499	40-46 Railway Parade, Loganlea, Qld 4131	None		Off Market	✓	✓	<ul style="list-style-type: none"> This site has a portion of 'Matters of local and state significance' overlay. Around 95% of this site is subject to high or medium flood risk. Around 30% of this site is affected by overland flow. Not available to the market. 	Unsuitable.
2RP103402 and 1RP103402	Low Impact Industry	2,023 and 2,010	58-60 Bega Road, Kingston, Qld 4114	None		Off Market	x	✓	<ul style="list-style-type: none"> This site has a small portion of 'Biodiversity areas' and 'Matters of local and state significance' overlay. Part-occupied. Not available to the market. 	Unavailable
5RP106788	Mixed-Use	40,903	28-34 Freedom Rise, Holmview, Qld 4207	None		Off Market	x	✓	<ul style="list-style-type: none"> This site has a portion of 'Biodiversity areas', 'Matters of local and state significance', and 'Waterway corridor trigger' overlay. Owned by Teys Australian therefore unlikely to be made available nor developed for self-storage. 	Unavailable.

Lot Plan	Zoning	Site Area (m2)	Address	Relevant Development Application*	DA Proposed/ Approved	Market Availability	Flood Affected	Potential Environmental Constraints	Notes**	Conclusion
									<ul style="list-style-type: none"> Around 50% of this site is affected by overland flow. At over 4ha, a self-storage facility would not represent the highest and best use of the land. Occupied and not available to the market. 	
6RP106788	Mixed-Use	44,108	8-26 Freedom Rise, Holmview, Qld 4207	None		Off Market	x	✓	<ul style="list-style-type: none"> This site has a portion of 'Biodiversity areas', 'Matters of local and state significance', and 'Waterway corridor trigger' overlay. Owned and occupied by Christian Outreach Centre and not likely to become available. Around 20% of this site is affected by overland flow. Not available to the market. 	Unsuitable and unavailable.
7RP106788	Mixed-Use	45,410	28 Teys Road (2-6 Freedom Rise) Holmview, Qld 4207	None		For Sale	x	✓	<ul style="list-style-type: none"> Most of this site has 'Biodiversity areas', 'Matters of local and state significance' overlay and a portion of this site has 'Waterway corridor trigger' overlay. Around 20% of this site is affected by overland flow. At over 4.5ha, a self-storage facility would not represent the highest and best use of the land. Occupied by a dwelling. 	Unsuitable.
294SP108864	Low Impact Industry	5,773	55 Eurora Street, Kingston, Qld 4114	None		Off Market	✓	x	<ul style="list-style-type: none"> Around 90% of this site is subject to moderate flood risk and the remaining area is subject to low flood risk. Around 50% of this site is affected by overland flow. 	Unsuitable.
31RP91039	Medium Impact Industry	24,731	71-77 Meakin Road, Meadowbrook, Qld 4131	MCUC/188/2022	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
28RP91039	Medium Impact Industry	24,742	47-53 Meakin Road,	MCUC/96/2021	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.

Lot Plan	Zoning	Site Area (m2)	Address	Relevant Development Application*	DA Proposed/ Approved	Market Availability	Flood Affected	Potential Environmental Constraints	Notes**	Conclusion
			Meadowbrook, Qld 4131							
21RP91039	Medium Impact Industry	10,005	28-30 Ellerslie Road, Meadowbrook, Qld 4131	MCUI/42/2018	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
5RP116133	Medium Impact Industry	9,319	20-22 Eurora Street, Kingston, Qld 4114	None		Off Market	✓	✓	<ul style="list-style-type: none"> This site has a portion of 'Biodiversity areas', 'Matters of local and state significance', and 'Waterway corridor trigger' overlay. Around 25% of this site is affected by overland flow. This site is around double the size required for a large self-storage facility therefore it would not represent the highest and best use of the land. Not available to the market. 	Constrained and unlikely to accommodate a self-storage facility. Unsuitable.
6RP116133	Medium Impact Industry	9,321	20-22 Eurora Street, Kingston, Qld 4114	None		Off Market	✓	✓	<ul style="list-style-type: none"> This site has a portion of 'Biodiversity areas', 'Matters of local and state significance', and 'Waterway corridor trigger' overlay. Around 80% of this site is subject to moderate flood risk and the remaining area is subject to high flood risk. Around 20% of this site is affected by overland flow. Not available to the market. 	Unsuitable.
4SP182391	Medium Impact Industry	23,494	21-27 Mudgee Street, Kingston, Qld 4114	MCUC/133/2023	Proposed	For Sale or Lease			<ul style="list-style-type: none"> A Development Application has been proposed over this site. Online for lease listing indicates owner's intent to construct the proposed development and then sell or lease the premises. At more than 2ha, a self-storage facility would not represent the highest and best use of this land. 	Unavailable.

Lot Plan	Zoning	Site Area (m2)	Address	Relevant Development Application*	DA Proposed/ Approved	Market Availability	Flood Affected	Potential Environmental Constraints	Notes**	Conclusion
1RP184803	Medium Impact Industry	26,720	11-19 Mudgee Street, Kingston, Qld 4114	None		Off Market	✓	✓	<ul style="list-style-type: none"> A large portion of this site has 'Biodiversity areas', 'Matters of local and state significance' overlay and a portion of this site has 'Waterway corridor trigger' overlay. Around 95% of this site is subject to high flood risk and the remaining area is subject to moderate flood risk. Around 90% of this site is affected by overland flow. Not available to the market. At more than 2ha, a self-storage facility would not represent the highest and best use of this land. 	Unsuitable.
1SP103663	Medium Impact Industry	53,491	0 Chambers Flat Road, Kingston, Qld 4114	None		Off Market	✓	✓	<ul style="list-style-type: none"> A large portion of this site has 'Biodiversity areas', 'Matters of local and state significance' overlay and a portion of this site has 'Waterway corridor trigger' overlay. 100% of this site is subject to high flood risk. 100% of this site is affected by overland flow. Not available to the market. 	Unsuitable.
0SP323791	Medium Impact Industry	11,534	Beal Street, Meadowbrook, Qld 4131			Off Market			<ul style="list-style-type: none"> This site is significantly impacted by an energy infrastructure easement and is considered unavailable. At around 2ha, a self-storage facility would not represent the highest and best use of the land. 	Unavailable and unsuitable.
0SP323791	Medium Impact Industry	19,884	Beal Street, Meadowbrook, Qld 4131			Off Market			<ul style="list-style-type: none"> This site is significantly impacted by an energy infrastructure easement and is considered unavailable. At around 2ha, a self-storage facility would not represent the highest and best use of the land. 	Unavailable.

Lot Plan	Zoning	Site Area (m2)	Address	Relevant Development Application*	DA Proposed/ Approved	Market Availability	Flood Affected	Potential Environmental Constraints	Notes**	Conclusion
3RP150088	Medium Impact Industry	21,175	2-34 Badu Court, Meadowbrook, Qld 4131			Off Market			<ul style="list-style-type: none"> This site is owned by "Queensland Electricity Transmission Corporation Limited" and is therefore unavailable. 	Unavailable.
2SP209263	Mixed-Use	3,123	4 Stone Court, Kingston, Qld 4114	COM/63/2015	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
2SP306801	Mixed-Use	3,262	10-14 Stone Court, Kingston, Qld 4114	MCUI/64/2022	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
3SP306801	Mixed-Use	4,360	10-14 Stone Court, Kingston, Qld 4114	MCUI/64/2022	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
4SP333678	Mixed-Use	8,013	Ellerslie Road, Meadowbrook, Qld 4131	MCUC/116/2022	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
2SP333676	Mixed-Use	7,709	Ellerslie Road, Meadowbrook, Qld 4131	MCUC/116/2022	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
5SP333679	Mixed-Use	8,071	Ellerslie Road, Meadowbrook, Qld 4131	MCUC/116/2022	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
6SP333680	Mixed-Use	8,015	Ellerslie Road, Meadowbrook, Qld 4131	MCUC/116/2022	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
1SP333675	Mixed-Use	6,536	Ellerslie Road, Meadowbrook, Qld 4131	None		N/A	✓	✓	<ul style="list-style-type: none"> A very small portion of this site has 'Biodiversity areas', 'Matters of local and state significance' overlay. 80% of this site is subject to moderate flood risk and the remaining area is subject to high flood risk. 	Unsuitable.
18RP91039	Mixed-Use	10,164	Ellerslie Road, Meadowbrook, Qld 4131	MCUC/116/2022	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.

Lot Plan	Zoning	Site Area (m2)	Address	Relevant Development Application*	DA Proposed/ Approved	Market Availability	Flood Affected	Potential Environmental Constraints	Notes**	Conclusion
3SP333677	Mixed-Use	7,807	Ellerslie Road, Meadowbrook, Qld 4131	MCUC/116/2022	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
41SP333673	Mixed-Use	3,760	Ellerslie Road, Meadowbrook, Qld 413	MCUC/21/2022	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
42SP333674	Mixed-Use	7,235	Ellerslie Road, Meadowbrook, Qld 413	MCUC/21/2022	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
5RP808673, 1BUP101697, 2BUP101697, 0BUP101697	Mixed-Use	2,003 , 466, 466, 1,053	6, 10-12 Nestor Drive, Meadowbrook, Qld 4131	MCUC/33/2020	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. Approved Healthcare Development with one tenancy for sale. 	Unavailable.
5RP191149	Mixed-Use	4,213	12 Goodooga Drive, Bethania, Qld 4205	MCUI/16/2017	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
6RP191149	Mixed-Use	3,916	12 Goodooga Drive, Bethania, Qld 4205	MCUI/16/2017	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
7RP191149	Mixed-Use	3,133	12 Goodooga Drive, Bethania, Qld 4205	MCUI/16/2017	Approved	Off Market			<ul style="list-style-type: none"> A Development Application has been approved over this site. 	Unavailable.
9RP106788	Mixed-Use	36,434	46 Teys Road, Holmview, Qld 4207	None		Off Market	x	✓	<ul style="list-style-type: none"> Most of this site has 'Biodiversity areas', 'Matters of local and state significance' overlay and a portion of this site has 'Waterway corridor trigger' overlay. Owned by Teys Australian therefore unlikely to be made available nor developed for self-storage. Around 25% of this site is affected by overland flow. Not available to the market. 	Unsuitable.

Lot Plan	Zoning	Site Area (m2)	Address	Relevant Development Application*	DA Proposed/ Approved	Market Availability	Flood Affected	Potential Environmental Constraints	Notes**	Conclusion
8RP106788	Mixed-Use	42,372	47 Teys Road, Holmview, Qld 4207	None		Off Market	x	✓	<ul style="list-style-type: none"> Most of this site has 'Biodiversity areas', 'Matters of local and state significance' overlay and a portion of this site has 'Waterway corridor trigger' overlay. Owned by Teys Australian therefore unlikely to be made available nor developed for self-storage. Around 40% of this site is affected by overland flow. Not available to the market. 	Unsuitable.
10RP106788	Mixed-Use	36,899	48 Teys Road, Holmview, Qld 4207	None		Off Market	x	✓	<ul style="list-style-type: none"> A portion of this site has 'Biodiversity areas', 'Matters of local and state significance' overlay. At over 3.6ha, a self-storage facility would not represent the highest and best use of this land. Not available to the market. 	Unsuitable.
4SP169275	Mixed-Use	39,756	49 Teys Road, Holmview, Qld 4207	None		Off Market	x	✓	<ul style="list-style-type: none"> Most of this site has 'Biodiversity areas', 'Matters of local and state significance' overlay and a portion of this site has 'Waterway corridor trigger' overlay. Around 5% of this site is affected by overland flow. At over 3.9ha, a self-storage facility would not represent the highest and best use of this land. Not available to the market. 	Unsuitable.
122W31722	Mixed-Use	243,494	50 Teys Road, Holmview, Qld 4207	None		Off Market	x	✓	<ul style="list-style-type: none"> A portion of this site has 'Biodiversity areas', 'Matters of local and state significance' and 'Waterway corridor trigger' overlay. Around 30% of this site is affected by overland flow. At over 24ha, a self-storage facility would not represent the highest and best use of this land. Not available to the market. 	Unsuitable.

Lot Plan	Zoning	Site Area (m2)	Address	Relevant Development Application*	DA Proposed/ Approved	Market Availability	Flood Affected	Potential Environmental Constraints	Notes**	Conclusion
127SP174628	Mixed-Use	49,063	51 Teys Road, Holmview, Qld 4207	None		Off Market	x	✓	<ul style="list-style-type: none"> A small portion of this site has 'Biodiversity areas', 'Matters of local and state significance' and 'Waterway corridor trigger' overlay. Around 40% of this site is affected by overland flow. At over 4.9ha, a self-storage facility would not represent the highest and best use of this land. Not available to the market. 	Unsuitable.
2RP46665	Mixed-Use	74,271	52 Teys Road, Holmview, Qld 4207	None		Off Market	✓	✓	<ul style="list-style-type: none"> A portion of this site has 'Biodiversity areas', 'Matters of local and state significance' and 'Waterway corridor trigger' overlay. Around 40% of this site is affected by overland flow. At over 7.4ha, a self-storage facility would not represent the highest and best use of this land. Not available to the market. 	Unsuitable.

Source: Logan City Council Development Enquiry Tool, Pricefinder, Logan City Council Flood Portal, Logan City Council Overlays. *Joint Lots are sites where adjacent lots can be combined to meet the requirement of 2,500m2 or greater. **Where a site has an approved DA or is owned by body corporate/government, flooding and environmental constraints (overlays) were not reviewed.