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

Attention: The Assessment Manager, Ned McDougal

Submission to Development Application - A006351184 - 21 WELLINGTON RD EAST BRISBANE QLD 4169 - Carry Out Building Work; Material Change of Use; Reconfigure a Lot - 15 Wellington Pty Ltd (Primary Applicant), Saunders Havill Group Pty Ltd (Consultant)

Dear Ned,

I am writing to express my strong objection to the proposed development application **A006351184**. As a concerned resident of the local area, I believe the proposed plans for this development create significant issues that will negatively impact our community's wellbeing and quality of life.

It is the intent of this submission to advise Council that I object to the approval of the application (Development Permit for Material Change of Use and Preliminary Approval for Carrying out Building Work (Multiple Dwelling – 787 units, Shop, Food and Drink Outlet and Office); and Development Permit for Reconfiguration of a Lot – Management lot subdivision (7 lots into 3 lots, new road, and new park).) on the subject site in its current form.

This application suffers from similar issues to those raised in submissions received for A004321661, with these issues now exacerbated due to the significantly increased height and 86% increase in the scale of the development proposed from 421 residential units to 787 units.

Building heights

In its current form, the proposed Multiple Dwelling development provides for three tower structures to be built in three stages. All towers are in excess of previous development approvals, at 31 Storeys for Tower A, 42 Stores for Tower B and 18 Storeys for Tower C (including roof top and mezzanine parking).

The Neighbourhood Plan code (Logan Road corridor precinct) provides for an Acceptable Outcome AO1 that says, on sites with an area of between 6,000 m² or greater but less than 8,000 m², the building height (storeys) is to be 8 storeys.

The site, the subject of this application, has an area of 7,148 m², which is below the threshold for 12 storeys (8,000 m² to 9,999 m²), and well below the threshold for 15 storeys (site areas of 10,000 m² or greater).

If the Acceptable Outcome is applied, the proposed building height is 500% more than what should be reasonably expected, given the clear guidance of the scheme documents. There is clear conflict with the provisions of the planning scheme with regard to height.

It is recognised that the City Plan 2014 is a performance based planning scheme and that the Acceptable Outcomes are taken as a default planning standard. The proponents of the application have sought to justify the departure from the applicable standards on a number of grounds, including alignment to the Woolloongabba Interim Land Use Plan and a loose justification that the Olympic context justifies the expansion of scale and scope.

It should be noted that, while applications in flight are to be considered under the existing City Plan framework, the subject site falls within Precinct 3: Neighbourhood Transition Precinct of the Interim Land Use Plan, which indicates that existing City Plan stipulations continue to apply.

The application in its present form negatively and unduly adversely impacts the amenity of adjoining and nearby developments through an inadequate step down to residential dwellings to the east, significant shading of those dwellings (300m+ at certain times of the year), and traffic and increased overland flow related issues.

Public Green Space

The public benefit of the delivery of proposed parkland is not considered to be of a size and scale to warrant the additional building height proposed. At 734 m² it equates to 1m² per additional unit, this contribution is even less per unit than the earlier A004321661 application.

Traffic Impact

The Traffic report appears to indicate an additional vehicle trip in the AM peaks and 108 in the PM peaks for the subject site. However, under the earlier A004321661 application this was 117 vehicle movements. It is unclear from the report how, despite 86% increase in site apartment yield, the traffic increase has not proportionally increased.

Additionally, the increase of traffic generated from the site has not been adequately assessed. The traffic report appears to have been recycled from another development, oddly considering Nile St and Wellington Road Traffic movements despite the access being via Hampton road.

Notably, the provided traffic report appears inadequate as it fails to consider the impacts on nearby intersections around Overend and Hampton Street, as well as Logan Road and Lotus Street, Hampton and Lotus Street, Lisburn and Hampton, potentially underestimating the true impact on local traffic flow.

Impacts on amenity

The proposed development's detrimental impact on community amenity is deeply concerning. The overshadowing effect will result in reduced sunlight and inadequate green spaces, exacerbating the already limited areas available for the growing population. Additionally, the anticipated increase in population will significantly strain existing infrastructure, leading to heightened traffic congestion and safety concerns.

Flooding

Moreover, the issue of flooding poses a significant threat to both accessibility and safety. Lotus Street, a critical access point, is prone to flooding, severely restricting access to the site. Additionally,

the site itself is susceptible to flooding, raising serious concerns about the safety and habitability of the proposed development.

Furthermore, the insufficient consideration for drainage systems and their impact is deeply troubling. Neglecting proper drainage plans can lead to severe consequences, including increased flooding, property damage, and potential health hazards.

Insufficient Community facilities

The inclusion of family-oriented apartments is sub-optimal given the pending impact of the State Government's decision to close the local public school. Failing to provide essential educational nearby infrastructure is likely to exacerbate the burden on the local road network as families commute to schools further afield.

The negative impacts of the additional residents generated by this development on existing parkland has not been adequately assessed.

Conclusion

In conclusion, this proposal clearly conflicts with the provisions of the City Plan and Neighbourhood Plan code (Logan Road corridor precinct) as well as the Woolloongabba Interim Land Use Plan (Precinct 3: Neighbourhood Transition Precinct). It has not demonstrated that the development is of a height, scale and form which is consistent with the amenity and character, community expectations and infrastructure assumptions intended for the relevant precinct, sub-precinct or site and is only developed at a greater height, scale and form where there is both a community need and an economic need for the development.

Council is requested to refuse the application in its current form and it is recommended Council only consider a modified development proposal which incorporates a development that is compliant with the requirements of City Plan 2014 and respects the provision of the Woolloongabba Neighbourhood Plan.

Thank you for your time and attention to this matter.

Sincerely,

[Your Name]