

Dear Brisbane City Council Development Assessment Team,

RE: FORMAL SUBMISSION OBJECTING TO DEVELOPMENT APPLICATION

A007059254

27 & 29 Dethridge Street, Northgate QLD 4013

Lots 33 & 35 on RP64980

I write to lodge a formal submission objecting to Development Application **A007059254**, which seeks changes to the approved multiple dwelling development at 27 and 29 Dethridge Street, Northgate.

The development previously approved under **A006614227** has now been substantially constructed and is in the final stages of completion.

Having reviewed both the approved plans and the plans submitted with A007059254, I acknowledge that the existing approved development already incorporates a rooftop terrace and associated communal facilities.

My objection is therefore **not to the existence of the approved 20-unit development or the existence of a rooftop terrace itself.**

My objection concerns the further changes and intensification now sought under A007059254, particularly changes to the upper and rooftop built form and any resulting increase in building bulk, visual dominance, rooftop activity, overlooking, noise, light pollution and other impacts upon surrounding residents.

These concerns are compounded by the particular physical constraints of Dethridge Street, including its narrow width, dead-end configuration, limited on-street parking and existing difficulties experienced by larger vehicles.

I respectfully request that Council **refuse A007059254 in its current form where the proposed changes materially increase the impacts of the development beyond those**

previously approved under A006614227.

1. The approved development has already been substantially constructed

An important consideration is that the existing development is not merely a conceptual proposal or an approval that has yet to be acted upon.

The building has already been substantially constructed and is presently in the final stages of completion.

Council therefore has the opportunity to physically inspect the development and directly observe its relationship with Dethridge Street and surrounding residential properties.

This provides a far more reliable basis for assessing the consequences of further changes than architectural plans or computer-generated representations alone.

I respectfully request that Council officers undertake a **physical site inspection before determining A007059254**, including observing the building from Dethridge Street and surrounding publicly accessible locations.

2. Existing approval already incorporates rooftop development

For clarity, I acknowledge that the approved A006614227 development already incorporates a rooftop terrace and communal facilities.

The approved plans identify a rooftop terrace at RL 21.150 and include a communal deck, landscaping, BBQ, sauna, foyer and accessible toilet facilities.

My objection is therefore not based upon an assertion that A007059254 introduces rooftop development for the first time.

Instead, Council should undertake a detailed comparison between:

the upper-level and rooftop development previously approved under A006614227 and now substantially constructed; and

the amended upper-level and rooftop built form sought under A007059254.

Council should clearly identify any increases or alterations in rooftop built form, coverage, structures, communal space, screening, height or intensity of use and assess the additional impacts arising specifically from those changes.

3. Scale of proposed rooftop development

The proposed documentation identifies a substantial rooftop area.

The proposed plans identify approximately **344.6m² of total rooftop area**, including approximately **263.9m² identified as communal rooftop area**, with approximately **138m² identified as roofed area**.

This represents a substantial elevated communal environment rather than merely roof access or an area containing building services.

Council should assess whether the proposed changes increase:

- the apparent height and bulk of the development;
- rooftop structures and coverage;
- the area capable of accommodating communal activity;

- the duration or intensity of rooftop use;
- opportunities for overlooking;
- noise impacts;
- lighting and light spill; and
- the overall visual prominence of the rooftop within the surrounding neighbourhood.

4. Existing building already represents a substantial built form

The development nearing completion already represents a substantial residential development within Dethridge Street.

The question before Council is therefore not whether residential development should occur on this site. Residential development has already been approved and substantially constructed.

The appropriate question is whether further alterations and intensification represent an acceptable planning outcome given the existing relationship between the development and surrounding residences.

The fact that substantial construction has occurred should not itself provide justification for permitting development beyond what was previously approved.

Any additional impacts arising from A007059254 should be independently justified on their planning merits.

5. Existing privacy and overlooking impacts upon surrounding residences

One of my most significant concerns is the **loss of privacy already experienced by surrounding residential properties because of the height and proximity of the existing development.**

From my observations as a nearby resident, the current building already provides elevated sightlines from its upper levels towards neighbouring properties.

Due to the significant difference in height between the development and surrounding residences, occupants at the upper levels are able to look down towards neighbouring

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The close proximity of the development to surrounding residences makes this particularly intrusive.

Unlike privacy impacts between properties of comparable height, surrounding residents have very limited practical ability to protect themselves from overlooking originating several storeys above ground level.

Conventional residential boundary fencing provides little or no protection against elevated overlooking. Similarly, normal landscaping cannot reasonably screen views originating from the upper levels of a building of this scale.

The existing building therefore provides Council with a real-world opportunity to assess the privacy consequences of the development.

I respectfully request that Council officers inspect the development and surrounding area and assess the actual sightlines between the building and neighbouring residential properties.

Any proposed change under A007059254 that increases usable elevated space, rooftop activity, building height or opportunities for overlooking should be carefully assessed and should not be permitted where it would further worsen the privacy of surrounding residents.

6. Rooftop noise impacts

I have serious concerns regarding the potential noise impacts associated with the rooftop communal area.

Noise generated at rooftop level can have materially different consequences from ordinary ground-level residential noise.

Because of the elevated position, there are fewer physical barriers between the source of rooftop noise and surrounding residential properties. Ground-level boundary fencing and landscaping provide little meaningful acoustic protection.

Voices, laughter, social gatherings, BBQ activity, music, movement of furniture and other communal activity therefore have the potential to travel outward and downward into surrounding residential properties.

This is particularly concerning during evening and night-time periods when background noise levels within a residential neighbourhood are lower.

The concern is not limited to occasional large gatherings. Regular everyday communal use by residents and their visitors has the potential to create an ongoing noise impact.

The proposed plans identify a significant communal rooftop area and substantial roofed space. Roofed communal areas may facilitate longer and more frequent use because they can provide protection from sun and weather.

Council should therefore carefully assess:

- the maximum number of people who may occupy the rooftop;
- the proposed hours of access;
- the location of BBQ, seating and gathering areas;
- whether the proposed changes increase the usable or roofed communal area;
- the potential for voices and social noise to travel from the elevated location;
- the use of amplified music, televisions or speakers;
- furniture and impact noise;
- the proximity of surrounding residences; and
- how unreasonable rooftop noise would practically be managed and enforced.

If any rooftop changes are approved, I request that strict and enforceable conditions be imposed concerning operating hours, amplified music, noise management and use of the communal facilities.

7. Rooftop lighting and light pollution

I am also concerned about **light pollution and glare from the elevated rooftop and upper levels.**

Lighting at rooftop level has the potential to affect a considerably wider area than equivalent lighting at ground level because there are fewer buildings, fences or vegetation capable of screening it.

Lighting associated with communal areas, BBQ facilities, pathways, safety requirements, architectural features and other rooftop structures may be directly visible from surrounding residential properties.

Potential impacts include:

- light spill into neighbouring bedrooms and living areas;
- glare visible from surrounding homes;
- increased night-time illumination;
- illumination of outdoor private areas;
- visual intrusion from elevated lighting; and
- cumulative impacts from rooftop, balcony, corridor and upper-level lighting.

Because the development rises substantially above surrounding residences, even lighting that might ordinarily be considered moderate may become prominent when viewed from neighbouring properties.

Council should require appropriate evidence demonstrating that rooftop and upper-level lighting will not cause unreasonable light spill or glare.

Any approved rooftop lighting should be appropriately shielded and directed, limited to the minimum intensity reasonably necessary and controlled to avoid unnecessary illumination during late evening and night-time periods.

8. Significant impact upon the Dethridge Street streetscape

The existing development already has a **substantial visual presence within Dethridge Street**.

From my observations as a local resident, **there are no other buildings of comparable height, bulk or scale on Dethridge Street or within its immediate vicinity**.

This is an important consideration.

The development is not located within an established streetscape of similarly scaled apartment buildings. Instead, it rises prominently above the substantially lower-scale residential development surrounding it.

The difference in scale is readily apparent from street level.

Any additional rooftop structures, coverage or upper-level built form proposed under A007059254 therefore have the potential to further increase the building's visual dominance.

Council should assess the proposal in the context of the **actual existing streetscape**, including:

- the significant difference in height between the development and surrounding residences;
- the absence of other buildings of comparable scale on or immediately around Dethridge Street;

- the visual dominance of the existing building when viewed from street level;
- the visibility of rooftop structures above surrounding buildings;
- the effect of additional rooftop coverage upon the perceived height and bulk of the building;
- whether the development provides an appropriate transition to surrounding lower-scale residential development; and
- the combined visual effect of building bulk, rooftop structures and night-time lighting.

Because construction is nearing completion, Council can directly observe these circumstances.

I strongly request that Council undertake an on-site streetscape assessment rather than relying solely upon architectural elevations or computer-generated perspectives.

9. Cumulative privacy, noise, lighting and visual impacts

Privacy, noise, lighting and visual dominance should not be considered independently.

The combined effect of the building's **height, proximity to surrounding residences, elevated overlooking, rooftop activity, noise, lighting and visual dominance** creates a significantly greater residential amenity impact than any individual issue considered in isolation.

Surrounding residents are already faced with a building substantially taller than surrounding development and which provides elevated views towards neighbouring properties.

Further changes should therefore seek to **avoid worsening those existing impacts**, rather than further intensifying them.

10. Dethridge Street is a narrow dead-end residential street

A further significant constraint is the physical nature of Dethridge Street itself.

Dethridge Street is a **narrow, dead-end residential street with no through access and limited available on-street parking**.

All vehicles entering the street must leave through the same route.

This includes residents, visitors, delivery vehicles, rideshare vehicles, tradespeople, removalists, Council waste collection vehicles and emergency services.

There is no alternative through-route available if access becomes congested or obstructed.

This makes Dethridge Street materially different from a wider through-road capable of accommodating greater traffic and parking demand.

11. Existing parking can effectively reduce the road to one trafficable lane

Dethridge Street already has limited available on-street parking.

When vehicles are parked on both sides of the road, the remaining usable carriageway is effectively reduced to approximately **one vehicle passage**.

Vehicles travelling in opposite directions cannot readily pass each other under these conditions and one vehicle may be required to wait or give way.

This is an existing and observable condition.

Council should assess the **actual usable width and operation of Dethridge Street when normal on-street parking is present**, rather than assessing its capacity on the theoretical assumption that both sides of the street are clear.

12. Council waste collection and larger service vehicles

From my observations as a resident, **Council waste collection trucks and other larger vehicles can already struggle to negotiate Dethridge Street when vehicles are parked on both sides of the road.**

This existing condition is relevant when considering any changes that may increase residential activity, visitors, servicing requirements or reliance upon street parking.

Council's assessment should reflect realistic operating conditions when vehicles are parked on the street.

Further parking pressure should not be permitted to worsen access for Council waste collection or other essential service vehicles.

13. Emergency vehicle access

I am particularly concerned about emergency service access.

Council should be satisfied that fire appliances, ambulances and other emergency vehicles can safely and promptly travel along Dethridge Street and access both the development and existing residences **when vehicles are parked on both sides of the street.**

Because Dethridge Street is a dead-end road, there is no alternative access route should the available carriageway become obstructed.

The ability of residents to leave the street while emergency vehicles are entering should also be considered.

This issue assumes additional importance given the flood and overland-flow constraints affecting the development site.

14. Parking provision and real-world demand

The approved and proposed documentation identifies **37 resident parking spaces and 5 visitor spaces.**

While this provides on-site parking, numerical parking provision alone does not necessarily demonstrate that there will be no impact upon Dethridge Street.

A 20-dwelling development will generate vehicle activity beyond permanently parked resident vehicles.

Visitors, food and parcel deliveries, rideshare vehicles, maintenance contractors, tradespeople and removalists will all require access.

Council should therefore be satisfied that foreseeable parking, loading, servicing and short-term stopping can be accommodated without unreasonable reliance upon an already constrained Dethridge Street.

Any aspect of A007059254 that increases occupancy, visitation or intensity without corresponding consideration of parking and servicing impacts should be carefully scrutinised.

15. Actual carriageway and vehicle passing assessment

I specifically request that Council undertake, or require the applicant to undertake, an assessment of the **actual usable carriageway width and vehicle passing conditions in Dethridge Street when vehicles are parked on both sides.**

This assessment should consider access by:

- opposing passenger vehicles;
- Council waste collection vehicles;
- fire appliances;
- ambulances;
- delivery vehicles;
- removalist trucks; and
- other essential service vehicles.

A level of traffic or parking demand that might be acceptable on a wider through-road should not automatically be considered acceptable on a narrow dead-end street where parked vehicles already substantially restrict two-way movement.

16. Flooding, overland flow and stormwater

The development is located on land affected by flood and/or overland-flow constraints.

Council should ensure that the changes sought under A007059254 do not adversely alter the flood performance of the development previously approved.

Any proposed changes affecting structures, drainage, landscaping, access, ground-level arrangements or other components relevant to flood behaviour should be supported by current technical assessment.

Council should be satisfied that the amended proposal will not:

- obstruct existing overland-flow paths;
- materially increase flood levels or velocities;
- reduce flood storage or conveyance capacity;
- increase stormwater impacts;
- transfer additional floodwater onto neighbouring properties; or
- otherwise increase risk to persons or property.

Any flood assessment should relate to the **development as substantially constructed together with the changes now proposed**, rather than assuming assessments undertaken for the original design automatically establish the acceptability of the amended proposal.

17. Flooding, evacuation and dead-end access

Flood risk should also be considered together with the physical limitations of Dethridge Street.

The combination of:

a flood/overland-flow affected location + a narrow dead-end street + restricted vehicle passing opportunities + no alternative through access

requires careful assessment of emergency access and evacuation.

Council should be satisfied that residents and emergency services can safely enter and leave Dethridge Street during significant rainfall or flooding events.

18. Overall cumulative impact of the proposed changes

I respectfully request that Council consider the **cumulative effect** of the proposed changes.

The relevant circumstances include:

existing overlooking + additional rooftop/upper-level development + rooftop communal activity + elevated noise + light pollution + visual dominance + limited parking + narrow road width + dead-end access + waste collection constraints + emergency vehicle access + flood and overland-flow constraints.

These matters cannot reasonably be assessed in isolation.

Importantly, because the existing development is now substantially constructed, many of these impacts can be directly observed and assessed in real-world conditions.

I therefore strongly request that Council undertake a site inspection before determining A007059254.

19. Requested outcome

For the reasons outlined above, I respectfully request that Brisbane City Council **REFUSE Development Application A007059254 in its current form where the proposed changes materially increase the height, bulk, rooftop intensity, visual dominance, overlooking or other amenity impacts of the development beyond those previously approved under A006614227.**

I reiterate that **I am not objecting to the existing 20-unit development or to the rooftop terrace already approved.**

My objection concerns the further changes now sought to a development that is already substantially constructed and already has a significant impact upon surrounding residences and the Dethridge Street streetscape.

In particular, I request that Council:

1. undertake a detailed comparison between the approved A006614227 plans and the proposed A007059254 plans and identify all material increases or changes in rooftop built form, roof coverage, height, communal area and intensity;
2. undertake a **physical site inspection** before determining the application;
3. inspect and assess the existing overlooking from the upper levels and rooftop towards surrounding residential properties;
4. refuse changes that materially worsen privacy or overlooking;
5. assess the likely propagation of noise from the elevated communal rooftop area and impose strict and enforceable noise and operating-hour controls where necessary;
6. assess rooftop and upper-level **light spill and light pollution**, particularly impacts upon neighbouring bedrooms, living areas and private open spaces;

7. assess the visual dominance of the building against the actual Dethridge Street streetscape, having particular regard to the absence of buildings of comparable height and scale in the immediate vicinity;
8. refuse proposed upper-level or rooftop changes that materially increase the building's visual bulk or dominance;
9. assess the actual usable carriageway width and vehicle passing conditions in Dethridge Street when vehicles are parked on both sides;
10. specifically assess access by Council waste collection trucks, fire appliances, ambulances and other large service vehicles under realistic parking conditions;
11. ensure that the development does not rely upon already constrained Dethridge Street for foreseeable overflow parking, loading or servicing;
12. ensure that proposed changes do not materially worsen flood, stormwater or overland-flow conditions; and
13. consider emergency access and evacuation having regard to Dethridge Street being a narrow dead-end road with no alternative through access.

If the applicant cannot demonstrate that the changes proposed under A007059254 will avoid additional unreasonable impacts upon surrounding residents and Dethridge Street, I respectfully submit that those changes **should not be approved**.

I request that Council have regard to this submission when undertaking its assessment of A007059254.

I also request that this submission be recorded as a **properly made submission for the purposes of the Planning Act 2016**, and that I be notified of Council's decision regarding the application.

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Thank you for considering my submission and the impacts of the proposed changes upon existing residents of Dethridge Street and the surrounding area.

Kind regards,

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