

Submission – Objection to Development Application A007063821

Development: Proposed nine-storey mixed-use residential development

Site: 257 Waterworks Road and 4 & 6 Stewart Place, Ashgrove QLD 4060

Application: A007063821

Applicant: Ashgrove Precinct Pty Ltd

To Brisbane City Council,

I wish to formally object to Development Application A007063821 for the proposed nine-storey residential and commercial development at 257 Waterworks Road and 4 & 6 Stewart Place, Ashgrove.

I acknowledge that the site is located within a District Centre and that some level of redevelopment and increased residential density may be appropriate for the area. However, I believe the scale, height and intensity of the proposed development are excessive and represent an inappropriate transition from the existing character of Ashgrove.

My objection is based on the following planning concerns.

1. Excessive building height and scale

The proposed nine-storey building represents a very substantial increase in scale compared with the surrounding development.

The proposal is not simply a modest increase in density. It would introduce a building of approximately 64 metres AHD, with nine residential storeys and rooftop facilities, into an established inner-western suburb that is predominantly characterised by substantially lower-scale development.

The scale of the development should be considered in the context of the surrounding streets, existing residential properties and the established character of Ashgrove.

I am concerned that the proposal would create an inappropriate visual and built-form precedent for the area. Approval of a development of this scale could make it considerably more difficult for Council to resist further applications for similarly tall buildings in locations that are not suitable for high-rise development.

I therefore request that Council carefully assess whether the proposed height and overall building form are genuinely consistent with the intent of the relevant planning scheme and the Ashgrove–Grange neighbourhood planning provisions.

2. Impact on the character of Ashgrove

Ashgrove has a distinctive established character consisting of predominantly low and medium-density residential development, substantial mature vegetation and a relatively leafy streetscape.

While increased housing supply is important, it should not automatically justify development at a scale that is fundamentally inconsistent with the established character of the locality.

The proposal would create a substantially different built form from that which currently exists in this part of Ashgrove.

I am concerned that the development would contribute to a gradual erosion of the character of the suburb through increasingly large apartment developments rather than providing development that responds appropriately to its surroundings.

Council should consider whether a substantially lower building, with a more appropriate transition in height and scale, could achieve additional housing without producing the same level of visual and amenity impacts.

3. Traffic and transport impacts

Waterworks Road is already an important and heavily used arterial route through Ashgrove and the surrounding western suburbs.

The proposed development would introduce 97 additional residential dwellings as well as approximately 1,015 square metres of commercial floor space.

Although the applicant's traffic assessment reportedly forecasts a reduction in peak-hour traffic compared with the previously approved commercial development, this comparison should not be the only consideration.

The relevant question is whether the proposed development is appropriate having regard to the existing traffic conditions, intersection performance, pedestrian movements and the cumulative effect of development occurring along Waterworks Road and surrounding streets.

The development would generate additional vehicle movements from residents, visitors, deliveries, commercial customers, service vehicles and construction activity.

I request that Council independently scrutinise the traffic assessment, including:

- existing and projected traffic conditions;
- access arrangements;
- impacts on Waterworks Road;
- impacts on Stewart Place and Memorial Avenue;
- pedestrian safety;
- vehicle queuing and turning movements;
- delivery and service vehicle movements;
- visitor parking;
- the cumulative impact of other developments in the surrounding area.

4. Parking and on-street impacts

The proposal includes 204 car parking spaces.

Given the proposed 97 apartments, commercial uses and associated visitors and service vehicles, Council should ensure that the proposed parking provision is genuinely adequate and that the development will not result in additional parking being displaced onto surrounding residential streets.

The impact of visitor parking is particularly important.

I request that Council carefully assess whether the proposed parking arrangements are sufficient for the actual likely demand generated by residents, visitors, commercial premises and service vehicles.

5. Residential amenity and overlooking

The substantial increase in building height and density creates potential impacts on the amenity of surrounding properties.

These include:

- overlooking;
- loss of privacy;
- visual bulk;
- reduced outlook;
- increased activity;
- noise;
- lighting;
- rooftop activity;
- potential impacts associated with the proposed swimming pool, gym and other communal facilities.

The proposed rooftop facilities are of particular concern because they introduce activity at a significant height above surrounding properties.

Council should carefully examine whether the proposed rooftop garden, swimming pool, gym, recreation areas and associated facilities could result in unreasonable noise, overlooking, lighting or other amenity impacts.

Appropriate conditions should be imposed if Council is minded to approve any part of the proposal.

6. Rooftop facilities and operating impacts

The rooftop component is not simply landscaping.

The proposal includes a swimming pool, gym and active recreation areas as well as other communal facilities.

These uses have the potential to create noise and activity at a height where impacts can extend beyond the immediate site.

I request that Council assess the likely noise and amenity impacts of these facilities on surrounding residential properties and require appropriate acoustic treatment, operating restrictions and management measures where necessary.

7. Construction impacts

A development of this scale would involve a prolonged construction period and substantial construction activity in an already busy part of Ashgrove.

I request that any approval include strong conditions addressing:

- construction traffic;
- hours of construction;
- dust;
- noise and vibration;
- pedestrian safety;
- truck movements;
- construction vehicle queuing;
- protection of surrounding roads and footpaths;
- protection of neighbouring properties.

Construction management should not be left to informal arrangements after approval.

8. Precedent for future development

I am particularly concerned about the precedent that approval of a nine-storey building could establish for Ashgrove.

The decision should not be considered in isolation from the cumulative effect of development throughout the suburb.

If a nine-storey building is approved on the basis that this particular site is suitable for such a development, it may become increasingly difficult for Council to prevent similar proposals from being advanced elsewhere in Ashgrove.

Council should therefore carefully consider whether the proposed height and scale represent an appropriate planning outcome for this locality, rather than simply whether the individual site can physically accommodate the proposed building.

9. Need for a more appropriate scale of development

I support sensible and well-designed development that provides additional housing and contributes positively to Ashgrove.

However, increased housing density does not necessarily require a nine-storey building.

A development of a substantially lower height and more sympathetic scale could provide additional housing while better respecting the established character of the suburb and reducing impacts on surrounding properties and infrastructure.

I therefore request that Council give serious consideration to whether the proposed development should be substantially reduced in height and scale.

Conclusion

For the reasons outlined above, I respectfully request that Brisbane City Council **refuse Development Application A007063821 in its current form.**

At a minimum, I request that Council require a substantial reduction in the height, scale and intensity of the proposed development and undertake detailed assessment of its traffic, parking, residential amenity, visual impact, rooftop activities and cumulative impact on the surrounding area.

Ashgrove needs appropriate development, but development should be compatible with the locality rather than allowing the character and scale of the suburb to be progressively determined by increasingly large individual projects.

I respectfully ask Council to take this submission into consideration when assessing Development Application A007063821.

Yours sincerely,