



5 December 2023

Ashleigh Coombes
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Planning Services City West
Development Services
Brisbane City Council
Via Email Ashleigh.Coombes@brisbane.qld.gov.au

Dear Ashleigh

Addendum to Response to Request for Further Information
Application Reference: A006180890
Address of Site: 2929 Old Cleveland Road Chandler QLD 4155

Further to our correspondence dated 29 November 2023, we wish to provide further commentary regarding responses to matters raised by Council in light of recent decisions for proposals we would have otherwise thought were inappropriate (given basis of assessments and advice provided regarding this application). We are specifically responding to the below, as per Council's 20 September 2023 further advice letter:

Issue	Matter(s) Raised
1	Intensity of Use
8	Noise/Industrial Impacts
11	Landscape Amenity on site and to street

Issue 1 – We were asked to provide further justifications regarding compatibility of the proposed garden centre within the Environmental Management Zone and in particular, it was suggested that Council's focus of assessment is upon a determination as to whether the proposal is a 'low-impact activity'. Notwithstanding our representations in relation to this matter (made 29 November 2023), we have recently been made aware of Council Decisions (A006196922 and A00556807) in respect to land at 2953 Old Cleveland Road, Chandler which is a 4184m² sized lot, zoned Environmental Management and located directly adjacent to land zoned as Neighborhood Centre.

Development Approval A006196922 (approved 1 December 2023) relates to a Material Change of Use for Agricultural Supplies Store and Bulk Landscape Supplies, whilst Development Approval A00556807 (approved 13 May 2021) relates to a Material Change of Use for a Service Station and Operational Works for a Vegetation Management Plan.

These development permits allow for an intensity of use, that in our opinion, is significantly more than what is proposed for the garden centre at 2929 Old Cleveland Road. In terms of comparison, we believe the following to be relevant in determining what Council has accepted as 'low impact activity' on Environmental Management Zoned land:

- a. Development Approval A006196922 and A00556807 at 2953 Old Cleveland Road completely change this Environmental Management zoned lot to be more urban in appearance. By comparison, we have sought a use within an existing building on site and intend to improve environmental conditions in accordance with the intent of the Environmental Management Zone, as per the Mediation Agreement.

It should be noted that neither 2929 or 2953 Old Cleveland Road are subject to vegetation of significance or contain KHA as per the Biodiversity Overlay. Based on Council's recent decisions, we are having difficulty understanding how such opposing views can be expressed, particularly given our application does not propose a full urban type development over the site but rather seeks to introduce a new use to be occupied within an existing building.

- b. Development Approval A006196922 stands to introduce non-local traffic and associated vehicles further into the local road network, as compared to the proposed garden centre which will utilise existing access points that are known to have been in place since the mid 1970's.

In terms of comparison, the carrying out of the uses (as per A006196922 and A00556807) results in vehicles arriving for refueling, visiting the 7-Eleven (independently of buying fuel) and/or trucks / cars and trailers associated with the bulk landscape goods / agricultural supplies store operations. Both these uses (as per A006196922 and A00556807) have a far higher impact than a single use garden centre which is intended to sell pots and packaged garden products.

- c. The operating hours for service station and 7-Eleven significantly exceed the operating hours of the proposed garden centre.

Issue 8 – In terms of noise, Council's further advice letter dated 20 September 2023 raised issues with nearby residential amenity (ie. separation distances to sensitive land uses, as per the Industry Code, *Brisbane City Plan 2014*). It is noted that the proposed garden centre seeks to reuse an existing shed and a small area of outdoor space that is 151.5m away from the nearest dwelling house (east). In comparison, the approved bulk landscape supply and agricultural supplies store have a separation distance of approximately 60m to 85m from existing sensitive receptors. We assume Council considered the fact that the above approved uses can generate noise associated with the loading and unloading of bulky goods which can likely emit potentially high fugitive noise emissions.

The nature and scope of activities allowed under the Garden Centre definition is clearly less in terms of potential noise generation compared to that reasonably expected at a bulk landscape supply yard or agricultural supplies store. If our proposed development has almost double the separation distance to sensitive receptors and the primary activity is the selling of pots, plants and packaged

items that will be primarily carried out indoors, the proposed garden centre could not reasonably have noise levels that exceed those associated with loading / unloading loose / bulk landscape items.

Issue 11 – Development Approvals A006196922 and A00556807 did not require shade trees within carparking areas, despite the fact that the approved uses result in a substantial increase in hard stand area on land that is zoned to generally retain greenspace values. On the basis of landscape matters raised in relation to our application, we would think it reasonable for Council to request a far greater percentage of green space/soft scape at 2953 Old Cleveland Road. By comparison, our proposal does not introduce new built forms, occupies a small part of the site and re-introduces natural assets expected within the environmental zone.

Furthermore, our development site has existing two-three tier landscape treatments on road frontages and internally and this fact seems to have been overlooked.

We trust this adds context to the further review of our development proposal.

Should you have any questions please do not hesitate to make contact.

Yours sincerely

Matthew Taylor

**Director
Planning Insights Pty Ltd**