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18 August 2026

Brisbane City Council  
GPO Box 1434  
Brisbane QLD 4001

Attention: Development Assessment (Properly Made Submission)

Submission on Development Application No. A006978377

Subject Land: 17 Arcoona Street, Sunnybank QLD 4109 (L43 RP.131873)

\*\*\*\*Same owner, identical construction site going on address 24 Arcoona St. Sunnybank 4109 (imagine more than 10 cars parked on a narrow street that will cause traffic jam and high potential avert risk)\*\*\*\*

Proposal: Rooming Accommodation consisting of six (6) rooms

Applicant: Rasen Holdings Pty Ltd  
(owner of both site of 17 & 24 Arcoona st. sunnybank 4109)

This is a properly made submission under the Planning Act 2016. I am a resident of the local neighbourhood at Sunnybank and I object to the above development application on the following grounds.

Grounds of Submission

#### 1. Non-compliance with Rooming Accommodation Code – Maximum Number of Residents

Under Brisbane City Plan 2014, rooming accommodation is only accepted development if it accommodates 5 persons or fewer and complies with all acceptable outcomes of the Rooming Accommodation Code. The proposal seeks approval for six (6) rooms, which exceeds this statutory maximum. Council must assess whether the proposal can lawfully proceed given this fundamental

non-compliance with the Code.

## 2. Scale and Intensity – Incompatibility with Low-Density Residential Character

A six-room rooming accommodation on a 902m<sup>2</sup> block represents a significant intensification of use beyond what is anticipated for a dwelling house in a low-density residential zone. Council has recognised the need to refine design requirements for rooming accommodation to "positively integrate into a low density suburban setting". The scale of this proposal raises serious questions about whether it will be compatible with surrounding development and whether it will maintain the appearance of a dwelling house being used for domestic purposes.

## 3. Impacts on Neighbourhood Amenity

City Plan requires rooming accommodation to "minimise the amenity impacts on neighbours and the surrounding area". A six-room facility of this nature is likely to generate increased noise, traffic, parking demand and general activity beyond that of a typical dwelling house. This is inconsistent with the reasonable expectations of residents in this low-density residential neighbourhood for a quiet, safe and stable living environment.

## 4. Flood Overlay – Potential Drainage and Safety Concerns

The subject site is affected by a flood overlay. A rooming accommodation with six rooms would increase the number of occupants potentially at risk during flood events. Council must carefully assess whether the proposal adequately addresses flood risk, emergency access and drainage impacts on adjoining properties.

### Requested Outcome

For the reasons set out above, I request that Council refuse Application No. A006978377 in its current form. In the alternative, should Council be minded to approve the application, I request that it be conditioned to reduce the number of rooms to no more than five (5) and to impose strict conditions addressing amenity, parking and flood safety.

As a submitter, I ask to be advised of Council's decision and note my appeal rights to the Planning and Environment Court.

Yours faithfully,

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Local resident