

To CEO Brisbane City Council

Please see attached

Submission (OBJECTION): A007048684

Multiple Dwellings and Centre Activities at 9 Longland Street, Newstead

Regards

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29 September 2026

Chief Executive Officer
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001
Attention: Dominic Hudson
By email dalodgement@brisbane.qld.gov.au

Dear Dominic

Submission (OBJECTION): A007048684
Multiple Dwellings and Centre Activities at 9 Longland Street, Newstead

1. In terms of the elements of a 'properly made submission', I note the following information in the first instance:

Requirements of a 'properly made submission'	Compliance
Signed in hard copy or electronically given in the way stated in the notice, by each person who made the submission	This submission will be lodged both electronically and posted to the Council in hard copy by the person making the submission.
Delivered during the period fixed for submissions	This submission will be lodged electronically, and posted so that it is received by the Council during the public submission period.

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The grounds, facts and circumstances	These will be made clear in this submission.
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Made to the assessment manager	This submission is made to the assessment manager.
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2. I do not intend to highlight every instance of non-compliance this application features, with respect to the assessment benchmarks. I trust Council's planning officers will attend to their own diligent assessment in this regard.

3. There are three primary issues which I rely on, as grounds which I say warrant refusal of the application.
4. In terms of the facts and circumstances relied upon to support this ground, I provide the following:

Ground 1: The proposed building height is a significant non-compliance with the City Plan, and on this basis alone – the application should be refused.

5. The land the subject of this application, comprises an area of 1,510m². Being land in the Commercial Road Precinct of the Newstead and Teneriffe Waterfront Neighbourhood Plan, with direct frontage to Longland Street, table 7.2.14.2.3.B of the City Plan tells the community that the building height at this location is a 'maximum building height' of 10 storeys.
6. The proposed development, subsequent to the response to the information request, will comprise 27 storeys. This exceeds other neighbouring building heights by 12 storeys.
7. To justify this 270% breach of 'maximum building height', the applicant's town planners have produced a table in the information response, in an effort to demonstrate this project is comparable with others which have been allowed (or intend to) exceed the 'maximum building heights' in the vicinity.
8. Council will have identified the referencing errors in the table produced by TPA. I trust Council has also noted that of the applications referenced, only two concern comparable sites, being sites in the same neighbourhood plan and precinct as the subject site, namely:
 - (a) A006490812 (Little Italy) – which had a site area of 3,298m² (more than double the site area here), and which is significantly closer to the higher order Ann Street, than the subject site; and
 - (b) A007021434 – located on a site of 1,380m² and still under assessment by Council. An approval of this application ought not be assumed, particularly where this site is located in the identified view corridor (Figure d of the Newstead and Teneriffe Waterfront Neighbourhood Plan).
9. Beyond the Acceptable Outcome that references table 7.2.14.2.3.B of the City Plan and its 'maximum building heights', the following provisions of the Newstead and Teneriffe Waterfront Neighbourhood Plan are relevant in terms of building height:
 - (a) PO1 and PO9 (both of which concern scale, height and design). In terms of PO9 (being specific to the Commercial Road precinct which is relevant to the subject site), the application fails completely, and very specifically in terms of (d) – which requires the development to complement 'the existing precinct character of low- to mid- rise bulky buildings through incorporating a low-level podium and a clearly defined and set-back tower element'.

In terms of PO1 – the proposed development fails completely. That is:

- (i) the proposed development is **not** of a height, scale and form that achieves the intended outcome for the precinct;
- (ii) the proposed development does **not** achieve the intended outcome of the precinct;
- (iii) the proposed development does **not** improve the amenity of the neighbourhood plan area, particularly important at this corner site location;
- (iv) the proposed development is **not** consistent with anticipated density and assumed infrastructure demand. This is a big fail;

- (v) the proposed development is **not** aligned to community expectations about the number of storeys to be built. At 270% over the 'maximum' number, this is another big fail;
- (vi) the proposed development is **not** proportionate to and commensurate with the utility of the site area and frontage width, particularly at a significant corner location. The proposed development still features an excessive podium height – which should be strongly discouraged at this corner site;
- (vii) the proposed development is **not** designed to avoid significant and undue adverse amenity impact to adjoining development;
- (viii) the proposed development is **not** sited to enable existing and future buildings to be well separated from each other and avoid affecting the potential development of adjoining sites.

The notes to PO1 alert readers to the fact that development that exceeds the intended number of storeys or building height can place disproportionate pressure on the transport network, public space or community facilities. And further, that development which is over-scaled for this site can result in an undesirable dominance of vehicle access, parking and manoeuvring areas that significantly reduce streetscape character and amenity. Council is reminded of these notes, and I submit that these concerns can all be legitimately applied here, as reasons for refusal.

- (b) Overall Outcome 5(a) of the Newstead and Teneriffe Waterfront Neighbourhood Plan confirms that this precinct is to be transformed into a medium to height density urban community. This should be read in conjunction with Overall Outcome 5(e), which states *"building height is highest on large sites along Longland Street, Commercial Road and Skyring Terrace. Smaller and narrower sites accommodate shorter buildings, while taller towers adopt a more slender form minimising the appearance of building bulk"*.

The approval of Little Italy, with immediate frontage to Longland Street, on a site more than double the size of the subject site here, makes sense in light of Overall Outcome 5(e).

However, this subject site is **not** a large site. The proposed development does **not** satisfy the overall outcomes relevant to building height (the most significant breach of the application when considered against the City Plan), and must be refused.

- (c) Overall Outcome 3(b) of the Newstead and Teneriffe Waterfront Neighbourhood Plan requires *"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"*.

The proposed development is **not** of a height, scale or form which is consistent with the amenity, character, community expectations and infrastructure assumptions for the site. Council's own document goes on to explain that in such instances, it can only occur where there is BOTH a community need and an economic need for the development.

No evidence, beyond general musings about housing supply, has been adduced. If discharging its statutory duties of assessment correctly – Council ought to be interrogating all applications properly with respect to Overall Outcome 3(b). It is insufficient for an assessment manager, to rely on anecdotal evidence given by opportunistic applicants, who scream 'need' for residential developments, where their proposals arrogantly and blatantly

disregard the Council's planning position and in turn, grossly exceed the community expectations and infrastructure assumptions for sites.

Ground 2: Due to the extent of overdevelopment proposed for the site, the proposed development cannot possibly comply with a proper assessment against the Council's local government infrastructure plan. Any approval of this application would add to the compounding affect on the already deficient ability for this area to function, particularly from a transport perspective, density of living and lack of green space.

10. Infrastructure assumptions are raised as part of a key assessment benchmark for this development, contained in Overall Outcome 3(b) of the Newstead and Teneriffe Waterfront Neighbourhood Plan, addressed above.
11. However – Council's LGIP is independently making its own assessment benchmark (see section 30(3) of the *Planning Regulation 2017*). The applicant has not made any discernible effort, to properly assess the application against the LGIP, including how it fares in terms of the assumptions built into the LGIP.
12. If every site in locations close to the CBD, were suddenly the subject of applications which more than doubled the intensity of impact than that which was assumed in the LGIP (with justification being that there's a 'housing crisis' and we need this resolved before the Olympic Games), Brisbane City's infrastructure networks would fail.
13. As a local to the Newstead area, whilst I cannot comment on the capacity of the sewerage or stormwater networks – I can say that the traffic infrastructure in this location is already strained. Longland Street is almost always congested already (its pinch point is both Ann Street, and the lack of a turning lane (when travelling towards the west along Longland Street) into the Woolworths Gasworks carpark, opposite Doggett Street). Commercial Road is almost impossible to access in peak hour.
14. Public transport in this precinct includes the frequent bus route 60. However, in peak times this service is often oversubscribed already. Newstead has already a very dense population, a shortage of services, a shortage of parking and for residents south of Gasworks there is no green space. The streets are clogged with litter, abandoned shopping trolleys, and dog urine and faeces is encountered almost every few metres in public areas. Surely this must stop.
15. Any further densification of this area should be paused until an updated transport infrastructure plan is devised for the area and some sensible planning limits for Newstead are established, and also amendments made to the LGIP resolved (so that Council can condition network improvements on developers in the ordinary fashion).

Ground 3: There are no relevant matters which support approval of this application in its current form. If Council is minded to approve developments in the Newstead, Teneriffe, New Farm and Fortitude Valley area, more than double the anticipated height and density – then Council needs to undertake the changes to its planning and infrastructure instruments first (so that community expectations are managed, and infrastructure planning can be done properly).

16. Council is strongly encouraged to demonstrate the discharge of proper planning process. This submission calls for this to take place, as opposed to an ill-informed acquiescence to opportunistic proponents, seeking to capitalise on the prevalent narrative concerning a 'housing crisis'.
17. As a resident in this area, I expect that sites like the subject site, will be the subject of development applications for building forms that are higher than their historical commercial/industrial origins. Indeed, in the Commercial Road Precinct, Overall Outcome 5(a) tells us that the precinct will be

transformed into a medium to high density urban community. Purchasing in the area, my expectations were for a *considered* and *properly planned* transformation to occur.

18. What is presently being pushed by developers to occur in this area (and no doubt other areas), is not considered or properly planned transformation. It is opportunistic, industry led – and will almost certainly end in strain to infrastructure, impacts to intended liveability and the degradation of community. Council needs to get ahead of this, for the sake of the City's longevity and not make short term decisions..
19. In the absence of demonstrable community need and economic need for the development, together with its complete disregard of the LGIP – an approval of this development is simply unavailable to Council.
20. There are no relevant matters that could justify an approval in such circumstances.
21. The application must be refused.

Yours Sincerely

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