


FW: Submissions/objections to proposed development at 87 pinelands Road Sunnybank Hills - application reference A006769643

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 1 attachment (555 KB)

Submissions for 87 Pinelands Rd Devellopment.pdf;

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From:
Sent: Tuesday, 31 March 2026 11:19 AM
To: dalodgement <dalodgement@brisbane.qld.gov.au>
Cc:
Subject: Submissions/objections to proposed development at 87 pinelands Road Sunnybank Hills - application reference A006769643

This email originates from outside of Brisbane City Council.

Town Planning Team
Brisbane City Council
Attention: Kayal Chandrasekar

Attached is submissions/objections to the proposed development at 87 pinelands Road Sunnybank Hills – application reference A006769643.

Please acknowledge receipt to both the sender

Regards

30 March 2026

Kayal Chandrasekar
A/Senior Urban Planner
Planning Services South
Development Services
Brisbane City Council
PO Box 1434
Brisbane QLD 4001

Dear Kayal

R.E. Submission Letter – Material Change of Use (A006769643) – Small-Scale Non-Residential Use (250sqm Office) – on land at 87 Pinelands Rd Sunnybank Hills QLD 4109 (Lot 1 RP62363).

I wish to lodge an objection to an application for a *Small-Scale Non-Residential Use* on the aforementioned site (above) based on the following matters as stated below:

- 1) **Background** - according to Brisbane City Council (BCC) 'Development i' an application was lodged on or around 9 May 2025 to which supporting material generally comprised:
 - Statutory Form.
 - Proposed plans and elevations.
 - City Waste Approval.
 - Traffic Report
 - Town Planning Assessment Report.
- 2) I understand the application at A006769643 aims to re-institute an approval for a previous Small-Scale Non-Residential Use approval (BCC Reference A004571369) decided 12 December 2017 and further modified (approval) 18 February 2022.
- 3) Based on observations made, I am advised that the content of this application submitted for Council's assessment (at A006769643) relies upon opinions and technical advice produced a decade ago pursuant to a previous City Plan 2014 iteration (A004571369 approved somewhere between City Plan 2014 version 1, and City Plan 2014 version 13).
- 4) On the 17th of February 2026 BCC issued an Information Request to which clarification on the following was sought:
 - a. Further justification relating to a potential Small-Scale Non-Residential use on this premises.
 - b. Aspects relating to reasonable preservation of amenity via 'built form and overlooking'.
 - c. Updated traffic assessment.
 - d. Demonstrate viability of stormwater Lawful Point of Discharge (LPOD).

- e. Demonstrate appropriate landscape outcomes through the provision of deep planting as expressed in a properly drafted landscape concept plan.
- 5) **Grounds for Objection** – My objection is generally based on the following matters as currently sourced in the BCC’s ‘Development i’ web page:
 - a. Material initially lodged in support of the application.
 - b. Council’s information Request.
 - c. Applicant’s response to Council’s information request.
 - 6) My points of objection are based on the matters raised by Council in the information request dated 17 February 2026.
 - 7) **Objection point 1 (Need)** – I note that the applicant’s information request response did not include a professionally prepared Economic Impact Needs Assessment to support the claims made in their 5 March 2026 Information Request Response, instead the applicant has suggested that the Council rely on a layman’s opinion despite City Plan 2014 v35 (Parts 9.3.32.2 (d & e) considerations. The notion that this Small-Scale Non-Residential Use should be supported on the basis of a dated ‘Needs Analysis’ is in our view highly inappropriate and cause for concern given the lack of technical information provided in response to the matter of need. The applicant has not provided any meaningful justification for need against the ‘current’ Brisbane City Plan 2014 v35 requirements. I do not believe the application should be given any further consideration unless a full *Economic Impact Assessment* is provided justifying the development with additional support from a qualified peer review.
 - 8) **Objection point 2 (Built Form, Privacy & Overlooking)** –
 - a. While the proposed structure is somewhat separate from the adjoining house at 91 Pinelands Rd, I note that large balconies/patios are proposed at the rear which in my opinion encourage overviews into my property. Given the scale of these spaces, I believe it reasonable to assume that my privacy could be negatively affected by the current design.
 - b. **Noise** – based on my review of the application material required I do not see any reporting indicating that noise levels emanating from the balconies/patios will reasonably comply with Council’s requirements or broader environmental policy. It is also unclear as to how the proposed office use will be managed to ensure noise impacts are controlled to reasonable levels (expected for a sensitive use close by).
 - c. **Operations** – it would be reasonable to assume that a non-residential uses such as the office proposed will be subject to lighting standards that accord with work health and safety requirements hence, it’s reasonable to assume that the building will be lit in such a way as to ensure safe work practices (internally), maintain safe passage in and around the development, ensure minimal security requirements are met. While this may accord with appropriate building functionality (within the site), I am concerned with the potential off site impacts of light spillage particularly in circumstances where such lighting exceeds expectations compared to typical residential lighting currently experienced in this part of the locality. To date I have not seen any consideration of this impact discussed in the application material.
 - d. **Operations** – the access and servicing arrangement encourages Refuse Collection Vehicles to travel down near our living areas and attend to bins stored at the rear. It is unclear as to the impact this arrangement will have on our amenity in terms of noise

and odour. I would think it reasonable that such a matter be clearly clarified and posted onto Council's development prior to any decision being made on this application.

- e. **CPTED** – parking to the rear of the building is significant cause for concern. The application does not show (in any way) how this development will control/minimise risk of antisocial behaviour and/or inappropriate use of the carpark after hours. I note that Council's need for a 2m high acoustic wall substantially block casual surveillance from general living areas in surrounding residential developments hence its questionable as to whether the design as proposed is a best fit given predominance of surrounding sensitive uses nearby (perhaps the development design should place parking areas toward the street to improve casual surveillance.
- 9) **Traffic** - the access and parking arrangement is based on a traffic assessment report that is almost 10 years old to which assessment is based on a completely different parking layout. I am advised that notwithstanding the fact that the traffic assessment supplied responds to a significantly outdated version of City Plan 2014, the fact that the traffic report does not comport with this proposed development at all is completely inappropriate. Based on advice provided, I understand the current traffic assessment put forward and reiterated as part of an information request response has absolutely no bearing on compliance requirements for the actual development proposed. Accordingly, Council should completely ignore the traffic support submitted and request an updated traffic assessment that actually references what is proposed. It is also noted that confirmation of waste servicing is based on a completely different development layout, I would expect that Council could not further consider waste servicing of this development without proper confirmation based on the actual plans proposed.
- 10) **Stormwater** – I note that Council is not convinced of stormwater discharge requirements. Please clarify whether the material provided in response to the information request is in fact appropriate and avoids creating nuisance to my property at 91 Pinelands Rd.
- 11) **Deep Planting** – The traffic assessment lodged with the application proposed 6 bays of which:
- a. The PWD adjacent area could be used for parking (rendering the PWD bay inoperable in certain circumstances). &
 - b. Proposed parts of bay 4 and all of bay 5 within deep planting areas nominated on the proposal plans.
- How are the conflicts between the proposal plans and traffic report to be assessed by Council? I am advised that Council typically wouldn't contemplate further assessment of material that proposed such conflicts and poorly conveyed actual development intent. This conflict should be fully resolved prior to any further consideration of the development
- 12) **Acoustic Fencing** – the applicant's response to Council's request is noted, however it would be good to know how a 2m high fence (that we are not buying into) manages to minimise impacts on our residential amenity. Given this application is impact assessable I think it would be reasonable to at least further elaborate on how the applicant is to address matters relating to PO14(d) of the Small-Scale Non-Residential Use Code.
- 13) **Landscape Concept Plan** – the landscape plan and development plans place the bin enclosure in different locations.

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SUMMARY

14) Based on our review of the application material available, I object to this development proposal and note that the applicant's responses to BCC's 'information request' are inappropriate and lacking in qualified detail. I am of the view that proper response to BCC's information request is essential and required to enable Council to properly assess and decide the proposal.

CONCLUSION

15) The applicant's Information Request Response does not address the specific requirements as set out in the BCC Information Request Response to which my specific concerns include:

- (a) instead of providing an updated Economic Needs Assessment Report, the applicant has endeavoured to rely on a report from 2016 when the Council has stated the 2016 report is outdated and not acceptable.
- (b) BCC states there is insufficient capacity within the existing centres to cater for the proposed commercial space and for the location requirements of the prospective tenants" but the applicant doesn't provide any substantive/specific information/data to support such a statement.
- (c) There is an expectation that Council's traffic assessment should rely upon information that is out dated and inconsistent with what is actually proposed in the plans submitted in response to Council's information request.
- (d) Impacts from operational noise are a significant concern to which assessment seems to neglect other than to discuss ramifications/need for an acoustic fence.
- (e) Impacts on amenity arising from uncontrolled light spillage from a use that is clearly different to the predominant residential uses in the immediate locality doesn't appear to be wholly addressed (perhaps limited to internal lighting/glazing).
- (f) The design appears to respond poorly to CPTED principles to which other aspects proposed to manage amenity (acoustic fencing) may serve to worsen antisocial behaviour/inappropriate use (in absence of reasonable casual surveillance).
- (g) Plans and supporting documents seem to be poorly coordinated, dated, and conflictual. I do not understand how such an application (on the whole) can be assessed to determine compliance with BCC's City Plan 2014 v35.

This submission with respect to the Information Request Response is that it does not address, provide and/or satisfy the proper town planning requirements of the Council as referred to in BCC's information request. The Council should not accept the Information Request Response in addressing its requirements as contained in the BCC Letter.

I trust this submission will be given due consideration by Council as part of its assessment of this application and a decision will be made only where the matters raised (in this submission) are adequately addressed and made accessible.

Yours sincerely