The Development Manager, Brisbane City Council, GPO Box 1434, Brisbane QLD 4001.

Or via email on Brisbane City Council's online facility at https://pdonline.brisbane.qld.gov.au/masterviewUI/modules/ApplicationMaster/default.aspx?page=wrapper&key=A004393354

I am writing to object to the proposed application to build a four storey 50 unit apartment complex at 11-19 Querrin St, Yeronga on the following grounds:

- the site is zoned for sport and recreational use and should be retained as green space for sporting and community purposes in accordance with the Strategic Framework Intent of City Plan 2014;
- the development application will overturn 103 years of continuous use of the MacGregor Green for community sporting purposes and result in the loss of open space;
- there is no other functional bowls Club within the suburb or surrounding suburbs for several kilometres:
- the heritage listed Clubhouse originally built in 1915 and grounds dating to 1913 will be adversely
 impacted by the application extending to the whole site as well as the bulk, scale and design of
 the proposed unit complex the revised proposal now encompasses the entire heritage listed
 site, impacting on the future protection of the historic club house and greens which is contrary to
 the strategic intentions of the Sport and Recreation Zone Code;
- the proposal is for a medium density development not a low to medium density development of one to three storeys as evidenced in the surrounding residential zoning the proposal for a 50 unit
- the four storey apartment complex is significantly out of keeping with the surrounding low to
 medium density residential area and is not consistent with the City Pan 2014 zoning intention for
 the area;
- under the Low to Medium Density Code the maximum allowable height of building, as it adjoins a 2 storey house, should be 2 storeys and 9.5ms – the proposal grossly exceeds this maximum allowable at 4 storeys and approx. 15ms;
- the building significantly exceeds the maximum allowable 30ms in both directions contributing to an overbearing bulk and scale that is out of keeping with the surrounding area;
- the developer has attempted to avoid the maximum site cover requirements by including the
 entire site. However, the Clubhouse and greens are not usable space for residents as they are
 controlled by membership of a separate incorporated body. In reality, the proposed 1,366sqm
 development equates to approx. 62% of the total site area is well in excess of the maximum
 allowable 45% under the surrounding low to medium density zoning;
- 61 car spaces is grossly inadequate for residents (50) and visitors (11) and will add to on-street congestion the area is also located in a regulated parking zone and on-street passes are not available to future residents;
- the traffic report erroneously presumes that the bowls club use generates approx. 10vph in peak hour but this is only one or two days per week not 24/7 as a unit development will be plus ongoing bowls club traffic. The residential estimate of 32vph, appears low but has been incorrectly reduced to avoid assessment as a 'major development' for traffic assessment purposes
- the Traffic Engineering Assessment incorrectly notes the 110 as a local bus service on Park Rd, Yeronga and severely over-estimates the frequency of the 104 bus service (a daytime hourly service only) evidencing a lack of knowledge and care with the proposed DA:
- the Traffic Construction Management Plan inappropriately and dangerously suggests the use of School Rd, which is heavily traffic calmed, to provide access to the site by high/heavy vehicles – access to the site is severely constrained by the Cardross St overpass, community facilities including Yeronga State School, a low rail bridge, roundabouts and School Rd traffic calming;
- the height of the building is likely to create adverse overlooking, privacy and amenity impacts on the two storey house;
- stormwater drainage is already inadequate and unable to cope in heavy rain including recent localised flooding and sewerage overflow in the June 2016 weather events, and further intensification of development will lead to ongoing localised flooding for nearby residents stormwater/sewerage impacts appear to have limited assessment in the supporting reports and were noted in the pre-lodgement meeting of 20 October 2015 to be "undersized" and that the applicant should be able to demonstrate "non-worsening from a stormwater quality perspective";
- the current greens act as a detention pond for overflow stormwater from the Clubhouse tanks –
 their removal will add significantly higher volumes and intensity of stormwater to the existing
 stormwater network this is highly likely to exacerbate flooding on the downstream homes and
 units:
- the rubbish bin collection point is inappropriately located on the boundary adjoining the two storey house highly like to cause noise and odour issues;
- the failure to provide suitable manoeuvring room onsite for the refuse truck and other delivery vehicles, will see the footpath, in a busy pedestrian area heading to a school and rail station, regularly blocked by heavy/high vehicles this is dangerously unsafe;

- the revised Traffic Engineering Report, offensively suggests that residents of the units will move belongings themselves or in small vehicles only to avoid meeting the heavy/high truck manoeuvring requirements of Council's Traffic Policy (TAPS) – this is simply an invalid and discriminatory assumption;
- the proposal fails to provide private open space with 3m minimum dimensions for all units;
- the proposal fails to provide an appropriate buffer zone between the units, clubhouse and remaining green;
- the overshadowing diagrammes clearly demonstrate adverse impacts through a reduction in sunlight on the remaining bowls green (shade is detrimental to the heritage listed green) and adjoining homes, particularly the adjoining units to the east;
- apart from one BBQ and table located in the front set-back, the proposal fails to provide adequate communal facilities for the residents and their visitors;
- the rear open space has been reduced and is not practical or usable;
- the proposal fails to include 50 secure cycling spaces, providing on wall mounted racks in the minimum standard car parking spaces for visitors – at only 2.6ms wide, accessing bikes will be dangerous and difficult given the lack of space in the 2.6m and 5.4m car parking spaces provided;
- all street trees and established on-site vegetation including hedges should be retained and a 10% area allocated for deep planting (in addition to common areas) currently plantings are largely within the private courtyards and not on communal land to be maintained by the body corporate;
- the siting of ancillary pump plants and structures predominately in the front set-back is not supported.

The applicant has repeatedly stressed in their application that the reason for this development is the financial future of the Club. This is not a sufficient reason to overturn the strategy intention for the site's zoning under *City Plan 2014*, and to ignore numerous acceptable and performance solutions under *City Plan 2014* that the application has failed to meet. Not once has the Club advised our community of their financial issues, called a public meeting to discuss their future or worked to find other community based uses.

The Applicant's decision to include the whole site in the application significantly threatens the continued historic, and community use of the Bowls Club.

It is also noted that the applicant has failed to substantively address almost all of the City Plan non-compliance issues raised in the Brisbane City Council information request. Their failure to work cooperatively with Council to address the issues of non-compliance, particularly regarding the height, site cover and heritage issues should be fatal to this application.

Finally, with Council's recent decision to approve the RSPCA site, this would be the second community / sporting use site to be lost in the suburb of Yeronga, adversely impacting on the necessary diversity in zoning intention under City Plan, to ensure diverse and liveable suburbs.

I do not support the application in its current form and believe the proposal should be refused.

Signature:		
Date:		
Name and Address:		