23/01/2026

[details removed by request]

DAPublic-A006890408-20260123-44092.pdf

Oppose

Refer to the attached letter and report.

ITE CONSULTING
TRAFFIC AND TRANSPORT ENGINEERS

ITE Consulting
ABN: 45657586949
34 Flamingo Crescent, Thornlands
4164
Brisbane
Contact: 0424110122
Email: herman@iteconsulting.com.au

21 January 2026
Ref: ITE0364

Attention:
Adrian Yu

RE: Traffic Letter – 16 Woodstock Road

On behalf of the submitter, please find attached (Appendix A) the Traffic Engineering Technical Note titled "16 Woodstock Road – Woodstock Road Access Objection Assessment", prepared by ITE Consulting and dated 21 January 2026.

The purpose of the attached assessment is to formally object to the proposed vehicle access to Woodstock Road associated with the development application for 16 Woodstock Road, Toowong (Application No. A006890408). The technical note has been prepared following a detailed review of the proposed development layout, access arrangements and parking configuration from a traffic engineering perspective.

The assessment demonstrates that the proposed access and parking arrangements do not achieve the relevant Performance Outcomes of the Brisbane City Plan 2014, particularly the Transport, Access, Parking and Servicing (TAPS) Code, the Transport, Access, Parking and Servicing Planning Scheme Policy, AS2890.1:2004, and the Austroads Guide to Road Design. Key matters addressed include inadequate sight distance on Woodstock Road, unsafe reversing movements onto the road network, non-compliant access arrangements relative to road hierarchy, internal queuing and parking functionality constraints, and increased reliance on on-street parking.

Based on the findings of the attached technical note, it is concluded that the proposed access to Woodstock Road would materially compromise the safety, efficiency and function of the surrounding road network and would not be consistent with the intent of the planning scheme.

We respectfully request that the attached assessment be considered as part of the assessment of the development application.

Should you require any further clarification or additional information, please do not hesitate to contact the undersigned.

Yours faithfully,

Herman Joubert
RPEQ No. 25899

Signed

21/01/2026

Date

APPENDIX

A

Technical Note

ITE CONSULTING
TRAFFIC AND TRANSPORT ENGINEERS

Date 21/01/2026
To Adrian Yu
From Herman Joubert
Copy to Effinity Projects
Subject 16 Woodstock Road – Woodstock Road Access Objection Assessment

1 INTRODUCTION

1.1 Purpose of Technical Note

This technical note was prepared to provide objection for providing access onto Woodstock Road as part of a proposed development for 16 Woodstock Road, Toowong (Application A006890408). A review of the proposed plans has been undertaken from a traffic engineering perspective and this technical note provides technical assessments regarding the unviable proposal for access from Woodstock Road.

1.2 Development Overview

It is understood that the proposed development would include 4 x Townhouses. Townhouse 3 and Townhouse 4 is proposed to obtain access from Woodstock Road and townhouse 1 and Townhouse 2 from Sherwood Road.

2 TRAFFIC ASSESSMENT

2.1 Car Park Supply

The proposed development allows for 2 x bays per dwelling and no dedicated visitor bays. The TPAS Policy requires a parking rate of 2.5 per dwelling where 4 -bedrooms are proposed and visitor parking at a rate of 0.25 per dwelling. The proposed parking supply is not compliant with the planning scheme outcomes and in particular the Brisbane City Council Transport, Access, Parking and Servicing Code.

The current parking requirements as per TAPS is provided in Table 2.1.

Table 2.1 Parking Supply Assessment

Parking Type	TAPS Requirements	Required Provision	Proposed to be provided
Resident Parking	2.5 spaces per 3 and above bedroom dwelling	(2.5x4) = 10 bays	10

Visitor Parking	0.25 spaces per dwelling for visitor parking. At least 50% of visitor parking is provided in communal areas, and not in tandem with resident parking	(0.25x4) = 1	2
Total		11	12

The development requires a total of 11 parking bays which includes 1 x visitor bay. The proposal provides a total of 12 x spaces. Although the total supply complies with the TAPS required rate, the following technical aspects of the layout is not supported from a traffic engineering perspective:

1. The functionality of the layout and parking would require car shuffling from the driveway in order for a vehicle to exit from the garage. This would require multiple reverse movements onto higher order roads which is not compliant with TAPS;
2. It is unclear how a vehicle would be able to enter the garage for each unit when a vehicle / visitor is occupying the driveway. It does not appear as if sufficient vehicle clearances can be achieved for passing as per AS2890.1:2004 which would have an impact on vehicle needing to queue on-street, thus further exacerbating safety concerns;
3. Even though visitor bays are proposed as shared resident / visitor on the driveway it is unknown how visitor bays will be freely accessible to be shared between all units. Resident bays are required at a rate of 2.5 per unit rounded to the nearest full number which theoretically requires 3 x resident bays per unit. In the event where residents have vehicle ownership greater than 2 x cars per unit, then freely accessible visitor parking on common property would not be available. This would provide further reliance on on-street parking which is not compliant with TAPS.

2.2 Vehicle Access

A review of the access requirements was carried out and the following was noted:

- Woodstock Road is a suburban Road and Sherwood Road is a district road. It is noted that PO3 of the Transport, access, parking and servicing code (TAPS code) requires that development provide vehicle access that is located and designed so as to have no significant impact on the safety, efficiency, function, convenience of use or capacity of the road network.
- AO9.2 of the TAPS code requires that a single site access driveway is provided to the lowest order frontage, and PO9 of the TAPS code requires access driveways in the road area to be located, designed and controlled to minimise adverse impacts on the safety and operation of the transport network, including pedestrian and cyclist movement. The proposed development access driveways to both frontages do not comply with PO1, PO3 and PO9 of the TAPS code.
- Both accesses requires vehicles to reverse off site which is not compliant with PO3 of the TAPS code. Given the road hierarchy forward in and forward out movements are required so to not significantly worsen the safety of the road network.

- Significant sight distance constraints are also expected for the proposed access off Woodstock Road. Given the road speed (design speed and anticipated 85th percentile speed) sufficient sight distances to allow for safe gap acceptance is not considered to be available. ITE have carried out a sight distance assessment.

2.3.1 Woodstock Road Sight Distance Assessment

A sight distance assessment was carried out in accordance with the following Performance Outcome measures to test any acceptance:

- ✓ Australian Standard AS2890.1:2004 – Parking Facilities, Part 1: Off-street car parking (40 m for 50 km/h urban environments)
- ✓ Austroads Guide to Road Design Part 4A – Intersections and Crossings: General, when applying the Extended Design Domain (EDD) values for reaction and observation time in a constrained brownfield context

AS2890.1:2004 Assessment

The development does not achieve measured sight distances of 40 m to the left and right of the proposed driveway in accordance with Australian Standard AS2890.1:2004 – Parking Facilities, Part 1: Off-street car parking. Clause 3.2 and Figure 3.2 of AS2890.1:2004 specify minimum sight distances from driveways based on the "safe intersection sight distance" (SISD) concept, allowing reduced values for urban, low-speed environments.

- ✓ For a design (approach) speed of 50 km/h, the standard recognises that 40 m sight distance is sufficient for low-volume access driveways.

AGRD Part 4A Assessment

Sharp curve horizontal signage indicates a design speed of 30km/h passing the site frontage where the driveway would be anticipated. As such, ITE have calculated the design speed most likely to arise given the horizontal curve fronting the proposed site on Woodstock Road. Preliminary design speeds around the horizontal curve fronting the driveway were calculated based on a side friction factor of 0.3 for cars and maximum superelevation of 2%. The anticipated design speed was calculated as:

$$R = \frac{V^2}{127\ (e + f)}$$

Where:

e = superelevation

f = side friction factor

V = speed (km/h)

R = Horisontal curvature

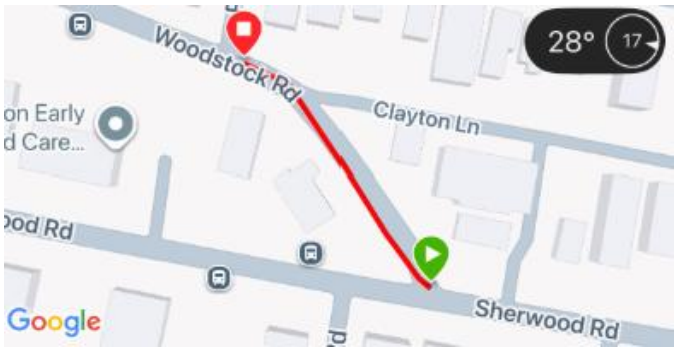
Table 2.2 illustrates the results.

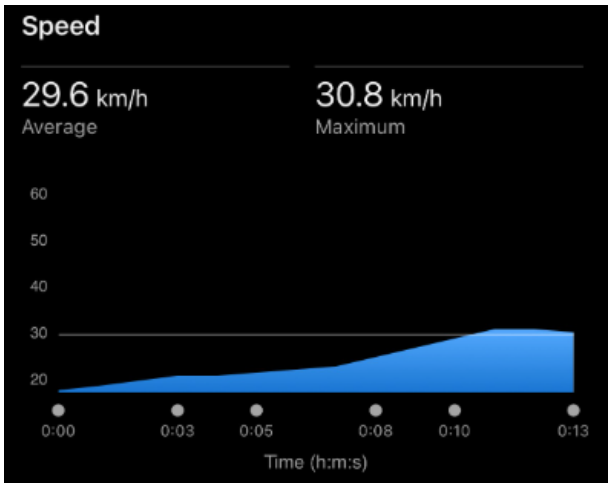
Table 2.2: Horisontal Curve Speeds

Curves (m)	Superelevation (max.)	Side friction factor	Speed (km/h)	Findings
32m (centreline)	2%	0.3	36 km/h	Correlation with sharp curve speed signage (30km/h) provided. Design speed usually +10km/h higher than operating speed.

ITE Consulting has carried out a GPS logged speed survey along the frontage road where the driveway is proposed. The GPS data found that the average anticipated desired speed travelling from east to west fronting the site is 30.8km/h.

Figure 1 Road Frontage GPS Speed Data





Source: ITE, 2025

Sight distance based on the calculated and GPS design speeds has been estimated as per the Austroads Guide to Road Design Part 4A criteria. Extended Design Domain has used the following:

- Observation time (OT) of 1.5 seconds (Clause 3.2.2 of Austroads Part 4A)

A.2.4 Observation Times for EDD Safe Intersection Sight Distance

The observation times used for the base cases under EDD safe intersection sight distance are given in Table A 8. A range of values are given depending on factors such as the complexity of the intersection and traffic volume. The observation times used for the check cases are given in the note to Table A 8.

Table A 8: Driver observation time for safe intersection sight distance under EDD

Observation time *OT* (sec)	Typical use
1.5	T-intersections on single carriageway roads (two-lane, two-way roads and one-way roads) that have a traffic volume < 4000 veh/d Cross intersections on single carriageway roads (two-lane, two-way roads and one-way roads) that have a traffic volume < 400 veh/d Simple intersection arrangements e.g. left in, left out on all roads
2.0	T-intersections on single carriageway roads (two-lane, two-way roads and one-way roads) that have a traffic volume ≥ 4000 veh/d Cross intersections on single carriageway roads (two-lane, two-way roads and one-way roads) that have a traffic volume ≥ 400 veh/d
2.5	T-intersections and cross intersections on multi-lane roads Intersections in overtaking lanes Complex intersection layouts Situations in which drivers may be distracted by other features

Note: The observation times in this table are applicable to the norm-day and truck-day base cases. The minimum observation times for the check cases are given below:

- *mean-day and skill-day as per this table*
- *norm-night, truck-night, mean-night and skill-night use 1.0 sec less than the values given in this table. Use of the lower observation times is associated with the additional cues drivers are given by observing the glow of the oncoming vehicle headlights.*

Source: AGRD Part4A

- Reaction time (RT) of 1.5 seconds (Table 5.2 of Austroads Part 3)

Table 5.2: Driver reaction times

Reaction time R_T (s)	Typical road conditions	Typical use
2.5	• Unalerted driving conditions due to the road only having isolated geometric features to maintain driver interest • Areas with high driver workload/complex decisions • High speed roads with long distances between towns.	Absolute minimum value for high speed roads with unalerted driving conditions. General minimum value for: • high speed rural freeways • high speed rural intersections • isolated alignment features.
2.0	• Higher speed urban areas • Few intersections • Alerted driving situations in rural areas • High speed roads in urban areas comprising numerous intersections or interchanges where the majority of driver trips are of relatively short length.	Absolute minimum value for the road conditions listed in this row. General minimum value for most road types, including those with alert driving conditions.
1.5(1)	Alert driving conditions e.g.: • high expectancy of stopping due to traffic signals • consistently tight alignments for example, mountainous roads • restricted low speed urban areas • built-up areas – high traffic volumes • interchange ramps when sighting over or around barriers.	Absolute minimum value. Only used in very constrained situations where drivers will be alert. Can be considered only where the maximum operating speed is ≤ 90 km/h. Should not be used where other design minima have been used.

1 A reaction time of 1.5 s cannot be used in Western Australia. Designers should refer to road agency supplements to confirm local practice.

Notes:

Source: AGRD Part4A

- Coefficient of longitudinal deceleration of 0.46 (Table 5.3 of Austroads Part 3)

- SISD (driver eye height 1.1m and upper parts of cars 1.25m)

The Austroads Guide to Road Design Part 4A – Intersections and Crossings: General recognises EDD values as appropriate where full desirable sight distances cannot be achieved due to site constraints but where the operating environment, traffic conditions, and risk profile justify a reduced parameter. Austroads explicitly recognises EDD as a legitimate design pathway in such constrained urban settings. Austroads GRD Part 4A, Section 3.2.5 notes that EDD is appropriate "where the design environment and operating conditions permit lower parameters without significant compromise to safety." The EDD reaction and observation times still account for human perception–response needs in simplified, low-speed environments. The SISD required under the Extended Design Criteria for the access driveway are provided in Table 2.3.

Table 2.3 SISD Requirements (EDD)

Parameter	Direction of Travel	
	To West	To East
Ot	1.5	1.5
Rt	1.5	1.5
Dt	3	3
V	36	36
d	0.46	0.46
a	0	0
SISD Required	**41**	**41**

Parameter	Direction of Travel	
	To West	To East
Ot	1.5	1.5
Rt	1.5	1.5
Dt	3	3
V	31	31
d	0.46	0.46
a	0	0
SISD Required	**34**	**34**

Based on the design speed a 41m sight distance is required and based on the anticipated operating speed a 34m sight distance is required. Based on these calculations, sufficient sight distances would still not be achieved to obtain or motivate a Performance Outcome. Safe sight distances along Woodstock Road where the access is proposed would not be achieved (refer to Sight Plan, Appendix A).

The following items specifically related to the TAPS Policy and Section 3, Infrastructure Design planning scheme policy (where relevant) have been assessed. Table 2.4 depicts the code assessment results.

Table 2.4 Code Compliance Assessment

Policy / Code	Clause / Ref / What it requires	Standard / metric applied in assessment	Analysis result (numeric where relevant)	Compliance status & rationale
TAPS Code (City Plan Part 9.4.11) — Purpose & PO1 (safe, efficient transport, access, parking & servicing)	Access must provide safe sight lines and not compromise network safety or efficiency.	Use relevant PSP/standards (AS2890.1, Austroads/IDPSP) to demonstrate safe operation.	Measured SSD L/R = 40 m; internal queuing not sufficient, vehicles would reverse off site with constrained sight lines.	Does not comply and would materially compromise safety or network function.
TAPS Code — PO3, PO9, PO11 (Active transport interface / cyclist & pedestrian safety)	Maintain pedestrian/cyclist safety — do not reduce space or sightlines for active modes.	Check cyclist sightlines, verge/kerb clearance, and whether access intrudes into future bikeway envelope.	Verge/kerbsetback would not be preserved; cyclist sightline would be compromised	Does not comply and would materially compromise safety or network function..
TAPS Code — PO15 (queuing)	Vehicle queueing must be contained on-site and not cause spillback.	On-site queuing capacity v peak queue demand;	Internal queuing not contained in compliance with TAPS and AS2890.1:2004	Does not comply — Queue spill back and reliance on on-street parking expected.
SC6.31 — TAPS PSP (Transport, Access, Parking & Servicing PSP) — Sections 2, 4, 6, 7	Demonstrate no material network impact; meet access geometry, spacing, gradients and sightline expectations or justify variation.	TIA methodology + AS2890.1 + Austroads EDD used to assess sight distance and network effect.	SSD does not meet AS2890.1; EDD assessment shows measured SSD ≥ operating SISD (34 m), slightly < EDD design SISD (41 m).	Does not comply and would materially compromise safety or network function
AS2890.1:2004 — Clause 3.2 / Figure 3.2 (SISD for driveways)	For 50 km/h urban environment low-volume driveways, minimum SISD = 40 m (as per Table 3.2).	AS2890.1:2004 SISD (50 km/h, urban) = 40 m	Measured SSD L/R = 32 m	Does not comply and would materially compromise safety or network function
Austroads Guide to Road Design Part 4A (Intersections & Crossings) — Extended Design Domain (EDD)	Where desirable SISD cannot be achieved, EDD (longer observation/reaction times) can be applied in constrained contexts — but EDD produces higher SISD values for a given design speed; alternatively use operating speed to derive SISD.	EDD parameters used: OT = 1.5 s, RT = 1.5 s, d = 0.46, a = 0; V design = 36 km/h → SISD = 41 m; V operating = 31 km/h → SISD = 34 m.	Measured SSD = 32 m.	Does not comply and would materially compromise safety or network function

The proposed access from Woodstock Road would not be complaint with the relevant provisions of the TAPS Policy or Section 3 of the Infrastructure Design planning scheme policy.

3 CONCLUSION

The following concluding remarks are made:

- The functionality of the layout and parking would require car shuffling from the driveway in order for a vehicle to exit from the garage. This would require multiple reverse movements onto higher order roads which is not compliant with TAPS;
- It is unclear how a vehicle would be able to enter the garage for each unit when a vehicle / visitor is occupying the driveway. It does not appear as if sufficient vehicle clearances can be achieved for passing as per AS2890.1:2004 which would have an impact on vehicle needing to queue on-street, thus further exacerbating safety concerns;
- Even though visitor bays are proposed as shared resident / visitor on the driveway it is unknown how visitor bays will be freely accessible to be shared between all units. Resident bays are required at a rate of 2.5 per unit rounded to the nearest full number which theoretically requires 3 x resident bays per unit. In the event where residents have vehicle ownership greater than 2 x cars per unit, then freely accessible visitor parking on common property would not be available. This would provide further reliance on on-street parking which is not compliant with TAPS.
- There is insufficient sight distances available along Woodstock Road to meet the TPAS or any Performance Outcome measures such as AGRD Part 4A / AS2890.1:2004 requirements. This does not meet the outcomes of the Planning Scheme and in particular PO3 of TAPS.
- All vehicles are proposed to reverse off site. Given the road hierarchies this is not considered to meet the outcomes of the TAPS Policy which requires vehicles to enter and exit the site in a forward gear. This would significantly compromise the safety and function of both Woodstock Road and Sherwood Road. In addition, this would further be exacerbated where the development needs to accommodate for MRV servicing on site to be compliant with the TAPS policy. The proposed development plans in its current form do not provide for any on-site service vehicle provisions.
- A shortfall of parking supply is proposed which will likely increase the reliance on on-street parking. This is not complaint with the TAPS Policy.

Given the analysis within this technical note, ITE consider the proposed development and in particular the proposed access from Woodstock Road would severely compromise the safety and function of the road with an increased reliance on on-street parking, insufficient vehicle sight distances as well as pedestrian and cyclist sight distances along Woodstock Road.

Approved by:

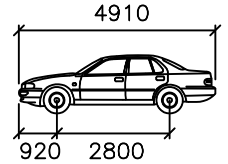
21/01/2026

Signed **Date**

Herman Joubert
RPEQ No.: 25899

Appendix A
Sight Distance Plan

Vehicle



B85

	mm
Width	: 1870
Track	: 1770
Lock to Lock Time	: 6.0
Steering Angle	: 34.1

Sight Distance Requirements

Equation 3.2.3 – Safe stopping distance for path users

$$S = \frac{V^2}{254 \times \left(f + \frac{G}{100}\right)} + \frac{R_T \times V}{3.6}$$

where:

- S = stopping distance (m)
- V = speed (km/h)
- RT = reaction time(s): 1.5 seconds assumes path users are in a relatively alert state approaching the driveway; longer reaction times are likely to apply to young users or locations where the hazard is not obvious (see Appendix C of this guideline)
- f = coefficient of friction
- G = grade (percent + for uphill, - for downhill)

Table 3.2.3 – Stopping distances for bicycles (and other path using devices)

	Bicycle speed (km/h)[2],[3]					
Gradient (%)[1]	**10**	**12**	**15**	**20**	**25**	**30**
-10	6	8	10	15	22	29
-5	6	7	10	14	20	26
-2	5	7	9	14	19	24
0	5	7	9	13	18	24
2	5	7	9	13	18	23
5	5	7	9	13	17	22
10	5	6	8	12	16	21

ITE CONSULTING
TRAFFIC AND TRANSPORT ENGINEERS

34 Flamingo Crescent
Thornlands
Queensland
4164

ITE CONSULTING

Tel: 0424 110 122

herman@iteconsulting.com.au
www.iteconsulting.com.au

	NAME:	RPEQ:	DATE:
DESIGNED:	-		
DRAWN:	Herman Joubert	25899	2026/01/05
CHECKED:	Herman Joubert	25899	2026/01/05

PROJECT:

16 Woodstock Road

DRAWING TITLE:

Sight Distance Plan

SCALE: 1:271	REV: -
	DATE: 2026/01/05

DRAWING NUMBER: 01

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ITE CONSULTING
TRAFFIC AND TRANSPORT ENGINEERS

Date 21/01/2026
To Adrian Yu
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R = Horisontal curvature

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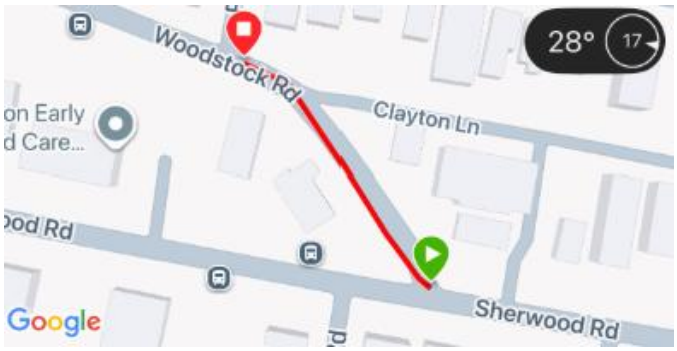

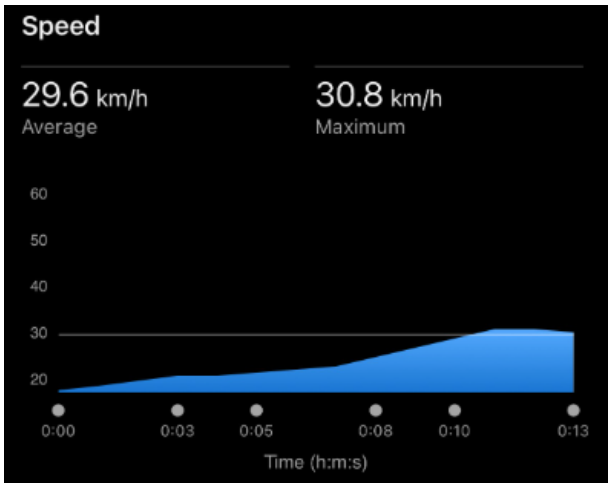

Source: ITE, 2025

Sight distance based on the calculated and GPS design speeds has been estimated as per the Austroads Guide to Road Design Part 4A criteria. Extended Design Domain has used the following:

- Observation time (OT) of 1.5 seconds (Clause 3.2.2 of Austroads Part 4A)

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2.0	T-intersections on single carriageway roads (two-lane, two-way roads and one-way roads) that have a traffic volume ≥ 4000 veh/d Cross intersections on single carriageway roads (two-lane, two-way roads and one-way roads) that have a traffic volume ≥ 400 veh/d
2.5	T-intersections and cross intersections on multi-lane roads Intersections in overtaking lanes Complex intersection layouts Situations in which drivers may be distracted by other features

Note: The observation times in this table are applicable to the norm-day and truck-day base cases. The minimum observation times for the check cases are given below:

- *mean-day and skill-day as per this table*
- *norm-night, truck-night, mean-night and skill-night use 1.0 sec less than the values given in this table. Use of the lower observation times is associated with the additional cues drivers are given by observing the glow of the oncoming vehicle headlights.*

Source: AGRD Part4A

- Reaction time (RT) of 1.5 seconds (Table 5.2 of Austroads Part 3)

Table 5.2: Driver reaction times

Reaction time R_T (s)	Typical road conditions	Typical use
2.5	• Unalerted driving conditions due to the road only having isolated geometric features to maintain driver interest • Areas with high driver workload/complex decisions • High speed roads with long distances between towns.	Absolute minimum value for high speed roads with unalerted driving conditions. General minimum value for: • high speed rural freeways • high speed rural intersections • isolated alignment features.
2.0	• Higher speed urban areas • Few intersections • Alerted driving situations in rural areas • High speed roads in urban areas comprising numerous intersections or interchanges where the majority of driver trips are of relatively short length.	Absolute minimum value for the road conditions listed in this row. General minimum value for most road types, including those with alert driving conditions.
1.5(1)	Alert driving conditions e.g.: • high expectancy of stopping due to traffic signals • consistently tight alignments for example, mountainous roads • restricted low speed urban areas • built-up areas – high traffic volumes • interchange ramps when sighting over or around barriers.	Absolute minimum value. Only used in very constrained situations where drivers will be alert. Can be considered only where the maximum operating speed is ≤ 90 km/h. Should not be used where other design minima have been used.

1 A reaction time of 1.5 s cannot be used in Western Australia. Designers should refer to road agency supplements to confirm local practice.

Notes:

Source: AGRD Part4A

- Coefficient of longitudinal deceleration of 0.46 (Table 5.3 of Austroads Part 3)

- SISD (driver eye height 1.1m and upper parts of cars 1.25m)

The Austroads Guide to Road Design Part 4A – Intersections and Crossings: General recognises EDD values as appropriate where full desirable sight distances cannot be achieved due to site constraints but where the operating environment, traffic conditions, and risk profile justify a reduced parameter. Austroads explicitly recognises EDD as a legitimate design pathway in such constrained urban settings. Austroads GRD Part 4A, Section 3.2.5 notes that EDD is appropriate "where the design environment and operating conditions permit lower parameters without significant compromise to safety." The EDD reaction and observation times still account for human perception–response needs in simplified, low-speed environments. The SISD required under the Extended Design Criteria for the access driveway are provided in Table 2.3.

Table 2.3 SISD Requirements (EDD)

Parameter	Direction of Travel	
	To West	To East
Ot	1.5	1.5
Rt	1.5	1.5
Dt	3	3
V	36	36
d	0.46	0.46
a	0	0
SISD Required	**41**	**41**

Parameter	Direction of Travel	
	To West	To East
Ot	1.5	1.5
Rt	1.5	1.5
Dt	3	3
V	31	31
d	0.46	0.46
a	0	0
SISD Required	**34**	**34**

Based on the design speed a 41m sight distance is required and based on the anticipated operating speed a 34m sight distance is required. Based on these calculations, sufficient sight distances would still not be achieved to obtain or motivate a Performance Outcome. Safe sight distances along Woodstock Road where the access is proposed would not be achieved (refer to Sight Plan, Appendix A).

The following items specifically related to the TAPS Policy and Section 3, Infrastructure Design planning scheme policy (where relevant) have been assessed. Table 2.4 depicts the code assessment results.

Table 2.4 Code Compliance Assessment

Policy / Code	Clause / Ref / What it requires	Standard / metric applied in assessment	Analysis result (numeric where relevant)	Compliance status & rationale
TAPS Code (City Plan Part 9.4.11) — Purpose & PO1 (safe, efficient transport, access, parking & servicing)	Access must provide safe sight lines and not compromise network safety or efficiency.	Use relevant PSP/standards (AS2890.1, Austroads/IDPSP) to demonstrate safe operation.	Measured SSD L/R = 40 m; internal queuing not sufficient, vehicles would reverse off site with constrained sight lines.	Does not comply and would materially compromise safety or network function.
TAPS Code — PO3, PO9, PO11 (Active transport interface / cyclist & pedestrian safety)	Maintain pedestrian/cyclist safety — do not reduce space or sightlines for active modes.	Check cyclist sightlines, verge/kerb clearance, and whether access intrudes into future bikeway envelope.	Verge/kerbsetback would not be preserved; cyclist sightline would be compromised	Does not comply and would materially compromise safety or network function..
TAPS Code — PO15 (queuing)	Vehicle queueing must be contained on-site and not cause spillback.	On-site queuing capacity v peak queue demand;	Internal queuing not contained in compliance with TAPS and AS2890.1:2004	Does not comply — Queue spill back and reliance on on-street parking expected.
SC6.31 — TAPS PSP (Transport, Access, Parking & Servicing PSP) — Sections 2, 4, 6, 7	Demonstrate no material network impact; meet access geometry, spacing, gradients and sightline expectations or justify variation.	TIA methodology + AS2890.1 + Austroads EDD used to assess sight distance and network effect.	SSD does not meet AS2890.1; EDD assessment shows measured SSD ≥ operating SISD (34 m), slightly < EDD design SISD (41 m).	Does not comply and would materially compromise safety or network function
AS2890.1:2004 — Clause 3.2 / Figure 3.2 (SISD for driveways)	For 50 km/h urban environment low-volume driveways, minimum SISD = 40 m (as per Table 3.2).	AS2890.1:2004 SISD (50 km/h, urban) = 40 m	Measured SSD L/R = 32 m	Does not comply and would materially compromise safety or network function
Austroads Guide to Road Design Part 4A (Intersections & Crossings) — Extended Design Domain (EDD)	Where desirable SISD cannot be achieved, EDD (longer observation/reaction times) can be applied in constrained contexts — but EDD produces higher SISD values for a given design speed; alternatively use operating speed to derive SISD.	EDD parameters used: OT = 1.5 s, RT = 1.5 s, d = 0.46, a = 0; V design = 36 km/h → SISD = 41 m; V operating = 31 km/h → SISD = 34 m.	Measured SSD = 32 m.	Does not comply and would materially compromise safety or network function

The proposed access from Woodstock Road would not be complaint with the relevant provisions of the TAPS Policy or Section 3 of the Infrastructure Design planning scheme policy.

3 CONCLUSION

The following concluding remarks are made:

- The functionality of the layout and parking would require car shuffling from the driveway in order for a vehicle to exit from the garage. This would require multiple reverse movements onto higher order roads which is not compliant with TAPS;
- It is unclear how a vehicle would be able to enter the garage for each unit when a vehicle / visitor is occupying the driveway. It does not appear as if sufficient vehicle clearances can be achieved for passing as per AS2890.1:2004 which would have an impact on vehicle needing to queue on-street, thus further exacerbating safety concerns;
- Even though visitor bays are proposed as shared resident / visitor on the driveway it is unknown how visitor bays will be freely accessible to be shared between all units. Resident bays are required at a rate of 2.5 per unit rounded to the nearest full number which theoretically requires 3 x resident bays per unit. In the event where residents have vehicle ownership greater than 2 x cars per unit, then freely accessible visitor parking on common property would not be available. This would provide further reliance on on-street parking which is not compliant with TAPS.
- There is insufficient sight distances available along Woodstock Road to meet the TPAS or any Performance Outcome measures such as AGRD Part 4A / AS2890.1:2004 requirements. This does not meet the outcomes of the Planning Scheme and in particular PO3 of TAPS.
- All vehicles are proposed to reverse off site. Given the road hierarchies this is not considered to meet the outcomes of the TAPS Policy which requires vehicles to enter and exit the site in a forward gear. This would significantly compromise the safety and function of both Woodstock Road and Sherwood Road. In addition, this would further be exacerbated where the development needs to accommodate for MRV servicing on site to be compliant with the TAPS policy. The proposed development plans in its current form do not provide for any on-site service vehicle provisions.
- A shortfall of parking supply is proposed which will likely increase the reliance on on-street parking. This is not complaint with the TAPS Policy.

Given the analysis within this technical note, ITE consider the proposed development and in particular the proposed access from Woodstock Road would severely compromise the safety and function of the road with an increased reliance on on-street parking, insufficient vehicle sight distances as well as pedestrian and cyclist sight distances along Woodstock Road.

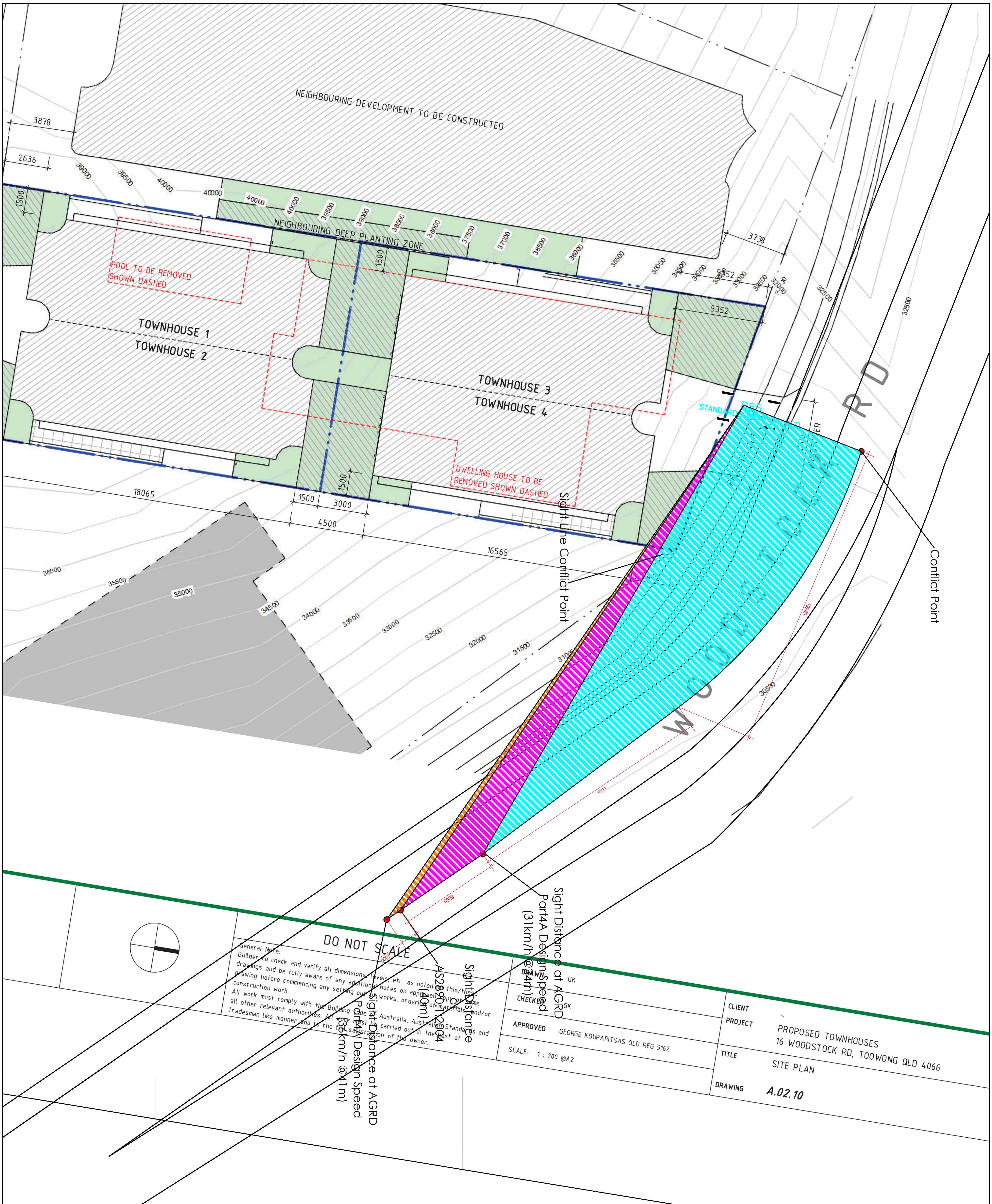
Approved by:

21/01/2026

Signed **Date**

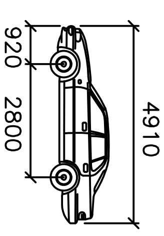
Herman Joubert
RPEQ No.: 25899

Appendix A
Sight Distance Plan



NEIGHBOURING DEVELOPMENT TO BE CONSTRUCTED
NEIGHBOURING DEEP PLANTING ZONE
POOL TO BE REMOVED SHOWN DASHED
TOWNHOUSE 1
TOWNHOUSE 2
TOWNHOUSE 3
TOWNHOUSE 4
DWELLING HOUSE TO BE REMOVED SHOWN DASHED
WOODSTOCK RD
Sight Line Conflict Point
Conflict Point
Sight Distance at AGRD Part4A Design Speed (31km/h @34m)
Sight Distance at AS2890.1:2004 (40m)
Sight Distance at AGRD Part4A Design Speed (35km/h @41m)
DO NOT SCALE
General Note:
Builder to check and verify all dimensions, levels, etc. as noted on this/these drawings and be fully aware of any additional notes on approved plans before commencing any setting out of works, ordering of materials and/or construction work.
All work must comply with the Building Code of Australia, Australian Standards and all other relevant authorities. All work must be carried out in the best of tradesman like manner and to the satisfaction of the owner.
DRAWN GK
CHECKED GK
APPROVED GEORGE KOUPARITSAS QLD REG 5162
SCALE: 1 : 200 @A2
CLIENT -
PROJECT PROPOSED TOWNHOUSES 16 WOODSTOCK RD, TOOWONG QLD 4066
TITLE SITE PLAN
DRAWING A.02.10

Vehicle



B85

mm

Width : 1870
Track : 1770
Lock to Lock Time : 6.0
Steering Angle : 34.1

Sight Distance Requirements

Equation 3.2.3 – Safe stopping distance for path users

$$S = \frac{V^2}{254\times\left(f+\frac{G}{100}\right)} + \frac{R_T \times V}{3.6}$$

where:

S = stopping distance (m)

V = speed (km/h)

RT = reaction time(s): 1.5 seconds assumes path users are in a relatively alert state approaching the driveway; longer reaction times are likely to apply to young users or locations where the hazard is not obvious (see Appendix C of this guideline)

f = coefficient of friction

G = grade (percent + for uphill, - for downhill)

Table 3.2.3 – Stopping distances for bicycles (and other path using devices)

Gradient (%)[1]	Bicycle speed (km/h)[2,3]					
	10	**12**	**15**	**20**	**25**	**30**
-10	6	8	10	15	22	29
-5	6	7	10	14	20	26
-2	5	7	9	14	19	24
0	5	7	9	13	18	24
2	5	7	9	13	18	23
5	5	7	9	13	17	22
10	5	6	8	12	16	21

ITE CONSULTING
TRAFFIC AND TRANSPORT ENGINEERS

ITE CONSULTING
34 Flamingo Crescent
Thornlands
Queensland
4164
Tel: 0424 110 122
herman@iteconsulting.com.au
www.iteconsulting.com.au

	NAME:	RPEQ:	DATE:
DESIGNED:	-		
DRAWN:	Herman Joubert	25899	2026/01/05
CHECKED:	Herman Joubert	25899	2026/01/05

PROJECT:
16 Woodstock Road

DRAWING TITLE:
Sight Distance Plan

SCALE: 1:271
REV: -
DATE: 2026/01/05
DRAWING NUMBER: 01

22 January 2026

The Chief Executive Officer
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

Attention: Shirley Mills, Senior Urban Planner

Dear Ms Mills,

Re: Submission on Development Application at 16 Woodstock Street, Toowong

We hereby provide a submission to Brisbane City Council regarding the current development application made by 16 Woodstock Pty Ltd c/ - Murray Bell Planning Co. over land located at 16 Woodstock Road, Toowong, seeking a Development Permit for a Material Change of Use for Multiple Dwelling (4 Units) (Council Reference: A006890408).

We are nearby property owners (details provided in the online form) and wish to formally lodge an objection to the proposed development. The development will result in adverse impacts on the residential amenity of adjoining properties and the surrounding local area. In particular, the proposal exhibits a poor design response to the site's limited utility, resulting in inappropriate building setbacks, inadequate building separation, and insufficient landscaping outcomes which collectively necessitate refusal by Council.

In addition to the above, the development has failed to overcome critical issues relating to vehicle access and maneuvering as part of the Information Request Response which in isolation necessitate the application be refused in the absence of a fundamental redesign to remove access from Woodstock Road. The access arrangements are, simply, unsafe.

We would appreciate if Council could take into consideration our comments whilst undertaking their full and proper statutory assessment of the development application.

1. Background

The development site is at 16 Woodstock Road and is more properly described as Lot 5 on RP55072. The site has a site area of 703m^2 and comprises a dual frontage to Sherwood Road and Woodstock Road. Woodstock Road is a suburban road, which is proposed to provide access to Units 1 and 2. Sherwood Road is a Sherwood Road is a suburban road, which is proposed to provide access to units 3 and 4.

The site is subject of the *Brisbane City Plan 2014* (*City Plan*) and is specifically identified within the Character (infill housing) zone and the Toowong – Indooroopilly District Neighbourhood Plan. Various overlays also apply to the site.

From our review of the development application material, we understand that the development application seeks approval for a Development Permit for Material Change of Use for Multiple Dwelling (4 units) and a Development Permit for Building work in the

Traditional Building Character Overlay. The proposal seeks two individual multiple dwelling buildings, with each building containing two units (in a duplex style presentation) and with each of those buildings comprising a height of four (4) storeys. Two (2) units are orientated to and accessed from Sherwood Road, and two (2) units are orientated and accessed from Woodstock Road.

2. Grounds for Objection and Consideration

We wish to advise Council that we object to the Applicant's current design and have identified several aspects of the proposal that require further consideration by Council and the Applicant in order to minimise adverse impacts on neighbouring properties and the broader surrounding local area. While we are not opposed to an appropriate form of development occurring on the site (which the current design is not), we respectfully request that any development fully and reasonably addresses the relevant provisions of the City Plan, as outlined below, so as to ensure an appropriate response to the site's characteristics and constraints, avoid unreasonable impacts on adjoining development, and maintain safe and suitable vehicular access arrangements

The following sets out the reasons for our objection to the application and current design.

Overarching Approach

The site is located within the Character Residential Zone, is subject of variable topography, and has two frontages to non-minor roads. The site has been granted an approval for demolition of a traditional character dwelling, however we understand that this is under challenge in the Court. There are planning and site characteristics that inform what is an appropriate outcome – which is not achieved by the development.

Notably, the development's pursuit of a duplex / townhouse style of development accentuates critical issues for the development. It results in accesses that require cars to reverse onto the non-minor roads, which is unsafe and an inefficient design approach. Its splitting into two buildings and providing of at-grade garaging does not allow for a good responsiveness to the site's topography and results in accentuating height, bulk and form. The architectural design is also extraordinarily generic, and does not make efforts to respond to the character context or a sub-tropical design outcome. Overall, the outcome is not sensitive to or responsive to its site and its context.

In this respect the proposal conflicts, in an overarching way, with the Character Residential Zone Code overall outcomes, including (4)(a), (c) and (d), (5)(a), (b), (d), (e) and (f), and (7)(b), (e), (f), (g), (i) and (k). There are also non-compliances with the Traditional Building Character (Design) Overlay Code, the Multiple Dwelling Code, the Road Hierarchy Overlay Code. In turn, there are also non-compliances with the Strategic Framework.

Building Height and Transition

Item 4 (Building Height) of Council's Information Request required the proposal to be amended to reduce the overall building height and to present as two storeys and less than 9.5m to Sherwood Road and three storeys to Woodstock Road. Notwithstanding this request, no substantive changes have been made to the overall building height and no attempt was made to consolidate any built form non-compliances centrally to the site.

All townhouses continue to present as four (4) storeys, and notably, have overall building heights of approximately 12m – 12.5m (in lieu of 9.5m), which is directly inconsistent with Council's stated expectations and the surrounding built form context.

In addition to the above, the proposal adjoins a low scale 1 – 2 storey pre 1947 dwelling house to the east at 6 Woodstock Road. The development is therefore subject to the building height transition requirements stipulated in Table 9.3.14.3.I which requires a maximum building height of 9.5m and 2 storeys where within 10m of the eastern side boundary.

The development therefore fails to comply with PO4(d), PO4(e) of the Multiple Dwelling Code in this regard as the development fails to provide an acceptable level of amenity impact to the adjoining dwelling house

In the absence of any substantial and meaningful changes to reduce the building height and include an acceptable building height transition to the adjoining dwelling house, Council should refuse the application.

Setbacks and Building Separation

Alternative outcomes are sought in relation to front and side setbacks. A side setback of 1.2m is provided to all side boundaries, whereas the Multiple Dwelling Code anticipates an average side setback of 4m for a building of this scale, to ensure adequate building separation, access to light and ventilation, landscaping opportunities and protection of residential amenity.

The proposed non-compliant side setbacks represent a substantial departure from Table 9.3.14.3.C of the Multiple Dwelling Code and results in an overly constrained built form that is inconsistent with the intended low-rise, spacious character of the Character (Infill Housing) Zone. The limited and inappropriate setbacks intensify the visual bulk of the development, restrict opportunities for meaningful deep planting, and increase the adverse amenity impacts on adjoining properties, including loss of privacy and reduced daylight.

The development furthermore includes a number of habitable spaces that are within the non-compliant side setbacks which adversely impact on the privacy to the adjacent residential properties.

Figure 1 below identifies compliant side setbacks for the development. The reduced setbacks do not protect the amenity and privacy of adjoining development. We are particularly concerned that the current development does not provide a sufficient degree of visual privacy (pursuant to PO7(b) and PO7(c)) having regard to the proposed 2nd, 3rd and 4th storey component overlooking the adjacent development to the west.

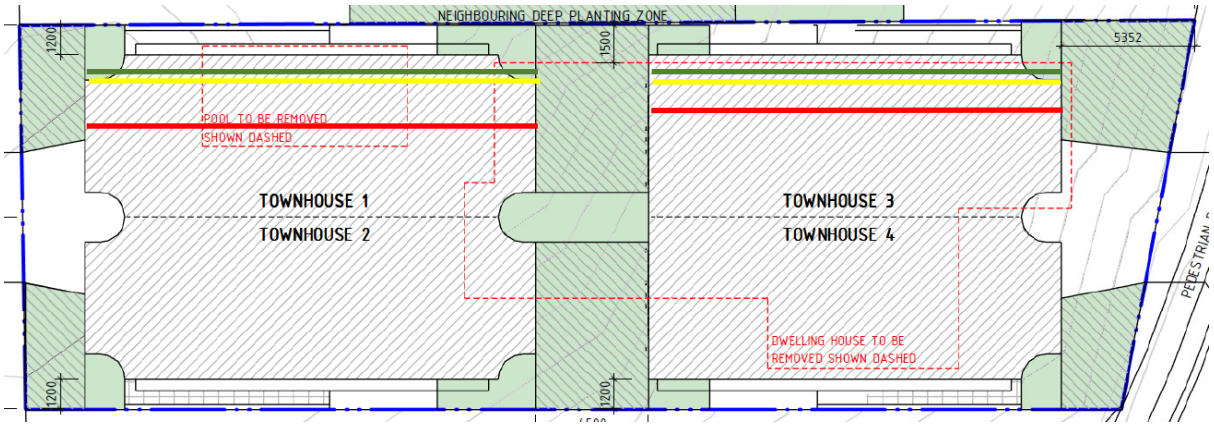


Figure 1 – Setback Assessment - Western Side Required Setbacks (red) and Equivalent Adjoining Side Setback (**Green** and **Yellow**) vs Proposed Built Form (Source: George Kouparitsas Architect 2025)

The adjoining approved multiple dwelling development to the west at 125 – 127 Sherwood Road provided reasonable and thoughtfully considered side setbacks, creating a suitable level of residential amenity which also supported the potential for appropriate separation for future buildings to provide visual privacy (subject to equitable setbacks being provided to future surrounding developments).

The non-compliant side setbacks of the proposed development fundamentally erode the opportunity to achieve comparable levels of residential amenity. **Figure 1** above identifies the location of comparable side setbacks (2.5m in green and 3.1m in yellow) provided by the adjoining multiple dwelling development.

By providing a uniform side setback of only 1.2m, the proposal significantly reduces building separation, resulting in an overly compressed built form that diminishes visual privacy, and removes access to natural light and ventilation. The constrained setbacks remove any meaningful opportunity for landscape buffering or transitional space between buildings, which is inconsistent with the outcomes achieved by surrounding development and undermines the planning intent of the Multiple Dwelling Code.

As shown in **Figure 2** below**,** the proposal includes several habitable spaces which are orientated to the side boundaries (western side) which compound and intensify the privacy and amenity impacts as a consequence of the non-compliant side boundary setbacks.

The inclusion of habitable rooms within these con-compliant side setbacks further intensifies the amenity impacts arising from the reduced building separation. Performance Outcome PO7 of the Multiple Dwelling Code seeks to avoid unreasonable overlooking of adjoining properties. In this instance, the orientation of habitable spaces toward the western side boundary, in combination with a side setback of only 1.2m, results in an unacceptable level of overlooking and a heightened perception of enclosure for adjoining residents.

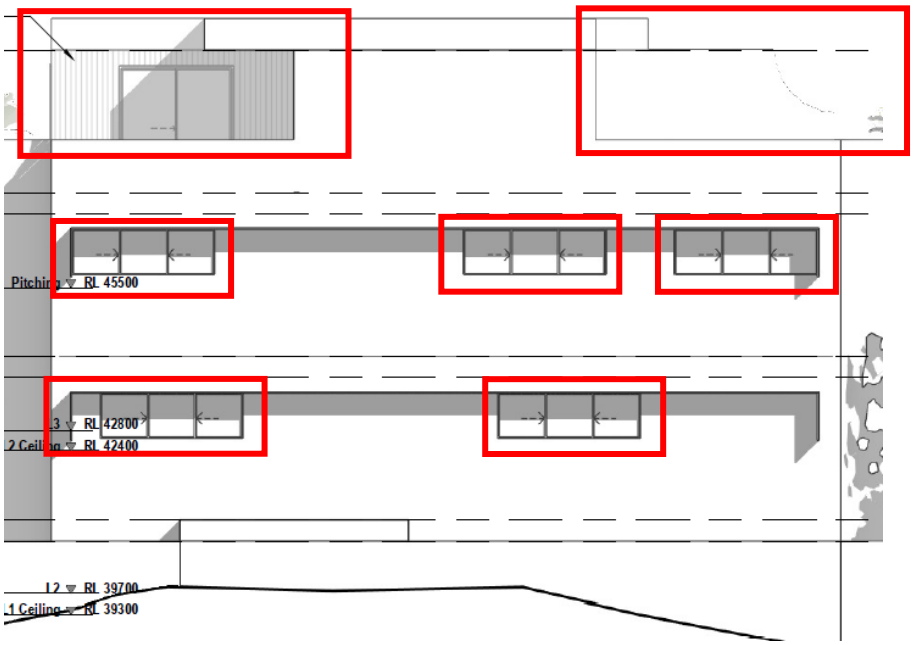


Figure 2 – Overlooking Habitable Spaces Within Non-Compliant Setbacks – Southern Building (Source: George Kouparitsas Architect 2025)

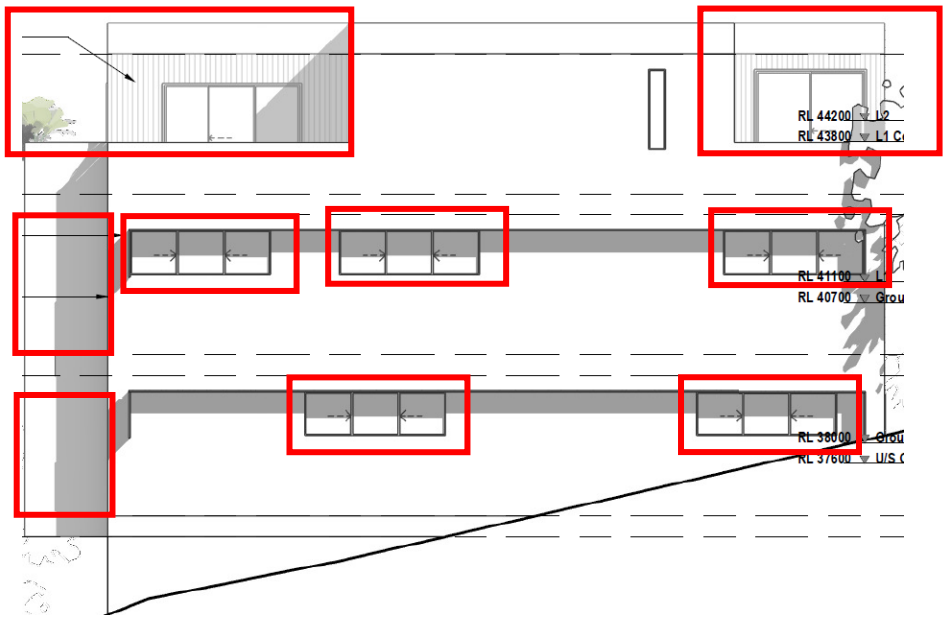


Figure 3 – Overlooking Habitable Spaces Within Non-Compliant Setbacks – Northern Building (Source: George Kouparitsas Architect 2025)

Having regard to the extent of the non-compliance with the side setback and building separation requirements and the resulting amenity impacts, the proposed development is not an appropriate response in its current form. The incorporation of habitable rooms within significantly reduced side setbacks demonstrates that the built form has not been appropriately designed for the site and fails to achieve acceptable levels of building separation and residential amenity. Council should therefore either refuse the application or require the development to be amended to provide compliant or demonstrably equivalent side setbacks that appropriately separate buildings, protect visual privacy through

appropriate orientation and placement of habitable spaces and ensure compliance with Performance Outcome PO7 of the Multiple Dwelling Code.

Vehicular Access (Woodstock Road) and Car Parking

Refer to the Traffic Assessment (**Attachment A**) prepared by ITE Consulting for further detail. The development has an unsafe access arrangement to the Woodstock Road frontage in addition to an overall shortfall of on-site car parking for residents, and no provision for visitor car parking. This results from the poorly conceived approach to access for the development, which in turn results not just in safety impacts to the road network, but also results in a poor amenity of the ground plane to both streets.

A detailed assessment has been provided in the Traffic Assessment in this regard which concludes that the development is characterised by unacceptable and insufficient vehicle sight distances, as well as inadequate pedestrian and cyclist sight distances along Woodstock Road, in addition to requiring vehicles to exit the site in reverse, further exacerbating safety risks. These arise because of this site's specific position along each road frontage, compared to other development sites locally.

Having regard to the identified traffic and parking impacts, the proposed development cannot be supported in its current form. The unsafe access arrangement to Woodstock Road, when combined with the shortfall in on-site resident parking and the absence of visitor parking, results in an unacceptable outcome that is inconsistent with the safe and efficient operation of the road network. Council should require the development to be amended to remove vehicular access from Woodstock Road and instead obtain consolidated access from Sherwood Road only, where traffic conditions, sight distances and the function of the road are potentially viable. The application should be refused pursuant to the Transport, Access, Parking and Servicing Code In the instance that the Applicant continues to propose access from Woodstock Road.

Inadequate Site Area and Frontage (Site Utility)

The subject site has a total site area of approximately 703m², with dual street frontages each measuring approximately 15m in width. This represents a shortfall against the minimum site area and frontage requirements for multiple dwelling development under City Plan.

The Multiple Dwelling Code anticipates that multiple dwelling development is to be located on sites with a minimum area of 800m² and a minimum frontage of 20m, in order to ensure that such development can be accommodated in a manner that is compatible with its surrounding context, including with respect to built form, scale, landscaping outcomes and impacts on adjoining development. These minimum dimensions are not arbitrary; rather, they are fundamental to achieving the planning intent of the code and the Character (Infill Housing) Zone more broadly.

The Character (Infill Housing) Zone Code seeks to ensure that development maintains the low-rise scale, established building rhythm and prevailing lot pattern of traditional character areas, and that new development is sensitive to the intended subtropical character, spacing and setting of buildings. Development that is sited on an undersized allotment with reduced frontage (such as the subject site) inherently limits the ability to achieve adequate building separation, meaningful landscaping, and a built form that reflects the established character and development pattern of the locality.

The width of both frontages (15m each) does not overcome the planning concerns associated with the overall deficiency in site dimensions. In particular, the limited frontage width exacerbates deficiencies in side boundary setbacks and building separation, resulting in inadequate spatial relief between the proposed development and adjoining properties. This outcome diminishes opportunities to achieve appropriate separation, landscaping, and interface treatment, and contributes to an over-compressed built form that is inconsistent with the intended scale, rhythm, and separation outcomes envisaged within the zone.

Accordingly, the proposed development represents an overdevelopment of the site, fails to adequately respond to the minimum requirements of the Multiple Dwelling Code in respect of key matters including setbacks, site cover and landscaping, and does not achieve the outcomes sought by the Character (Infill Housing) Zone Code and fails to comply with PO1 of the Multiple Dwelling Code. In the absence of substantive amendments to address these non-compliances, the development is not appropriately sited or designed for the subject site and should either be amended to achieve compliance with the applicable planning framework or refused by Council.

3. Non-Compliance of City Plan Provisions

In addition to the above matters, there are a number of matters that demonstrate the development application is unable to achieve compliance against the City Plan and results in further overdevelopment of the site as summarised below.

- **Site cover** – The proposed development results in a tower site cover of 60%, which is significantly greater than 45% stipulated in Acceptable Outcome (AO3) of the Multiple Dwelling Code.

  The proposed overall site cover is substantially greater than the maximum building envelope for the site, particularly having regard to the immediate context including the adjacent dwelling house to the east and approved adjacent multiple dwelling to the west.

  The purpose of the site cover provision is to ensure the development has a building footprint which is of an appropriate form and intensity and importantly delivers a balanced built form outcome which provides for sufficient building setbacks and open space and deep planting and landscaping areas. This is a fundamental provision within the City Plan to prevent excessive bulk and overdevelopment. Having regard to the proposed site cover together with other non-compliant factors (including building height, setbacks, building separation and deep planting as detailed in this letter), the proposed development has resulted in an excessive bulk and scale. The development fails to comply with PO8 of the Multiple Dwelling Code as a result. It is recommended that Council refuse the application if meaningful amendments are not provided in this regard.

- **Deep Planting** – The proposed development relies on misleading and inaccurate deep planting calculations, which underpin key conclusions in both the Town Planning Report and the Information Request Response. The Applicant's Information Request Response asserts that approximately 17% of the site area is dedicated to deep planting; however, this figure is not supported by the proposed Architectural Plans or the Landscape Concept Plans.

  A review of the submitted Landscape Concept Plans confirms that deep planting is limited to a small, consolidated landscaped area located centrally between the two building forms, with no meaningful deep planting provided to either street frontage (which is going to be further compromised should sensible vehicle access ultimately be pursued), and comprising a total of 60m^2 (8.55% of total site area) of deep planting. That deep planting area suffers from limited access to sunlight, given it is surrounded by built

form. The actual outcome is directly contrary to the statements contained within the Town Planning Report and Information Request Response, which indicate that deep planting is distributed across the site, including to both street interfaces. As a result, the proposal fails to deliver any tangible visual or environmental benefit to the surrounding streetscape or public realm.

Given the constrained site dimensions and the extent of other built form non-compliances, the lack of meaningful deep planting further contributes to the overdevelopment of the site and the development fails to comply with PO3, PO28 and PO29 of the Multiple Dwelling Code as a result. Council should therefore require the design to be amended to provide increased and improved deep planting in prominent and publicly visible locations, or refuse the application in the absence of any meaningful changes on the basis that the proposal does not achieve the landscape, amenity and character outcomes sought by the planning framework.

- **Traditional Building Character** - the proposed development exhibits little to no traditional building character outcomes. It is promoted by the Applicant that the development is attempting a contemporary expression of traditional building character. However, the lack of any lightweight materials or building articulation further compounds the issues pertaining to building height and site cover and fails to achieve compliance with PO5, PO7 and PO7 of the Traditional Building Character (Design) Overlay Code. It is recommended that the application be amended to incorporate key features such as a roof form and lightweight materials to the façade and external walls.

4. Summary

We thank Council for the opportunity to make a submission, and are grateful for Council's consideration of our observations and concerns in their assessment of the development application.

Based on the facts and circumstances in this submission, we oppose approval of the application in its current form and request that fundamental changes are made to the proposal in accordance with the issues outlined in this letter. Failing this, the application should be refused by Council as it will not ensure the development provides for an outcome that is conscious of its interface with adjoining properties and the local context which mitigates adverse impacts to residential amenity.

We would be happy to discuss any aspect of this submission with Brisbane City Council in more detail. Our details have been provided on the online form.