

To Brisbane City Council,

We are writing to object to the proposal of the subdivision of 47 Bonneville Street, Holland Park West from one residential lot into two lots (A007058292). We ask council to take into consideration the following points when assessing the subdivision application.

1. Departure from the Acceptable Outcome

The application proposes the creation of a 356 m² allotment, which is below the 400 m² Acceptable Outcome under the subdivision code within the Brisbane City Plan 2014. While I appreciate that Council may approve a smaller lot through performance assessment, I believe this requires a robust demonstration that the Performance Outcomes have been achieved.

In my view, the application does not provide sufficient objective evidence to justify this departure.

2. Limited analysis of neighbourhood character

The planning report concludes that the proposal is compatible with the surrounding locality, however the supporting analysis appears selective.

The report relies primarily on comparisons with 26 Mulsanne Street (401 m²) and 51 Bonneville Street (459 m²). While these are relevant nearby examples, they are also among the smallest allotments in the immediate area and are not, in my opinion, representative of the prevailing subdivision pattern.

To better understand the local context, I reviewed the lot sizes of more than 50 surrounding properties on Bonneville Street and Mulsanne Street. This review found that:

- the predominant lot sizes remain approximately 600–700 m²;
- there are a limited number of smaller allotments between approximately 398 m² and 459 m²; and
- I was unable to identify any comparable allotment of 356 m² within the immediate locality.

I respectfully submit that the application has not adequately demonstrated why a lot of this size should nevertheless be considered consistent with the established character of the neighbourhood.

3. Future built form has not been demonstrated

The application states that the proposed lots are capable of accommodating future dwellings; however, no concept building envelopes, indicative dwelling layouts, shadow diagrams or similar information has been provided.

The applicant's response to PO1 states that the proposed 356 m² lot is capable of accommodating a minimum 9 m × 15 m rectangle and therefore a future dwelling. However, demonstrating that a dwelling can physically fit within the minimum rectangle does not, in itself, demonstrate that the resulting development will achieve the broader planning outcomes relating to neighbourhood character, streetscape, residential amenity and future development capacity.

As a result, it is difficult to assess whether future development can occur while maintaining:

- appropriate building separation;
- adequate setback;
- landscaping opportunities;
- residential privacy;
- access to sunlight; and
- the spacious suburban character that currently exists within the surrounding streets.

Given that the proposal seeks approval for a lot below the 400 m² Acceptable Outcome, I believe Council should have greater confidence that future development can achieve these outcomes before exercising its discretion.

4. Potential impact on the Bonneville Street streetscape

While much attention is understandably focused on the proposed 356 m² allotment, I am also concerned about the 400 m² lot fronting Bonneville Street.

The application does not demonstrate how a future dwelling on this lot will relate to the existing streetscape. Without any indicative building envelope or concept design, it is difficult to determine whether future development will maintain the existing rhythm of detached dwellings, landscaping, setbacks and openness that characterise Bonneville Street.

5. Impact on available parking within the local area

The proposed subdivision will also have a direct impact on the availability of kerbside parking. As Lot 2 will front Mulsanne Street, it will require independent vehicle access and a further driveway crossover. This will remove additional kerb space from an area where on-street parking is already constrained. Given the limited lot size, it is important that Council consider not only whether a future dwelling can technically provide parking, but also the cumulative effect of additional driveway crossovers on the availability of kerbside parking for existing residents and visitors

Conclusion

I respectfully request that Council carefully consider whether the application has provided sufficient evidence to demonstrate compliance with the relevant Performance Outcomes of the Subdivision Code, particularly those relating to neighbourhood character, streetscape and future residential amenity.

While I recognise that performance-based assessment allows flexibility where appropriate, I do not believe the current application provides enough objective evidence to justify a departure below the 400 m² Acceptable Outcome or to demonstrate that the proposal will maintain the intended character of this part of Holland Park West.

Thank you for considering our submission.

Kind regards,