To Whom It May Concern,

Submission to Brisbane City Council
Development Application – Multiple Unit Dwelling (18 Townhouse Units) 90 Rogers Parade West, Everton Park 4053
Application Reference: A007025394
To Brisbane City Council,
I wish to lodge this submission regarding the proposed Multiple Unit Dwelling development comprising 18 townhouse units (12 three-bedroom units and 6 four-bedroom units).
I wish to make it clear that I am not opposed to development or urban infill. I recognise that Brisbane is a growing city and that additional housing is required to accommodate population growth. My concern is that developments of this scale are often assessed individually, without giving sufficient consideration to their long-term cumulative impacts on surrounding properties, the natural environment and existing infrastructure.
In particular, I am concerned that this proposal, when considered alongside the proposed development at 78 Rogers Parade West, does not adequately address the cumulative impacts on stormwater management, flooding, erosion, biodiversity, traffic, parking and the long-term health of the waterway behind these developments. These impacts extend well beyond the boundaries of the development site and have the potential to affect neighbouring properties, both upstream and downstream, for many years into the future.
Stormwater Runoff, Flooding and Cumulative Hydrological Impacts
The proposed development cannot be considered in isolation. Together with the proposed development at 78 Rogers Parade West, which comprises a similar number of townhouse dwellings, there will be a substantial increase in impervious surfaces within the same local catchment.
Replacing permeable ground with buildings, roads, driveways and paved areas significantly reduces the site's natural ability to absorb rainfall. Consequently, a much greater proportion of rainfall becomes surface runoff entering the drainage easement and waterway located behind these developments.
The proposed development of 12 three-bedroom units and 6 four-bedroom units could reasonably accommodate approximately 65 residents. When combined with the proposed development at 78 Rogers Parade West, the area could accommodate approximately 120–140 additional residents, significantly increasing stormwater generation within the same drainage catchment.
While each development may individually satisfy Council's minimum stormwater requirements, the cumulative impact of approximately 38 additional townhouse dwellings discharging into the same drainage corridor has the potential to substantially increase both the volume and velocity of stormwater entering the waterway.

The drainage easement already carries considerable stormwater during heavy rainfall events. Additional runoff from both developments will place increased pressure on both upstream and downstream drainage capacity. If downstream infrastructure reaches capacity during significant rainfall events, water may back up through the drainage system, increasing hydraulic pressure on upstream properties and worsening existing drainage issues.

The increased discharge also has the potential to:

Accelerate erosion of the drainage corridor and creek banks.

Increase sediment transport and bank instability.

Contribute to flooding impacts on upstream and downstream properties.

Increase maintenance requirements for Council infrastructure.

Reduce the long-term resilience of the existing drainage system during increasingly intense rainfall events.

Increase the risk that existing drainage infrastructure becomes overwhelmed during major storm events.

Council should not assess these developments independently where both discharge into the same receiving environment. A cumulative stormwater and hydraulic assessment is necessary to properly understand the combined impacts on the local catchment.

Biodiversity Corridor

The drainage easement and adjoining waterway function as an important biodiversity corridor, providing habitat and movement pathways for native wildlife.

Increased stormwater flows have the potential to degrade this corridor through erosion, sedimentation, poorer water quality and damage to riparian vegetation. Over time, this reduces habitat quality for native flora and fauna and diminishes the environmental values the corridor currently provides.

Although each development may individually appear to have only a modest impact, the cumulative effects of continued urban intensification along this drainage corridor risk progressively degrading the ecological function of the waterway.

Council should ensure the proposal adequately demonstrates that the biodiversity corridor will not be adversely affected by increased stormwater discharge from both developments.

Density and Infrastructure Capacity

The proposal represents a significant increase in residential density on a relatively small site. A development capable of accommodating approximately 65 residents, and potentially more than 120 residents when considered alongside the proposed development at 78 Rogers Parade West, will inevitably increase demand on local infrastructure, drainage systems and transport networks.

The reduction in permeable open space means substantially more rainfall will become runoff entering the drainage easement rather than naturally infiltrating into the ground. This change is particularly concerning given the existing drainage conditions and the cumulative effects of nearby developments.

Traffic and Parking

The proposed development provides only six visitor parking spaces for eighteen dwellings. While each dwelling includes a double garage, this level of visitor parking appears inadequate for a development of this scale, particularly one consisting largely of family-sized three and four-bedroom dwellings.

Many households now own more than two vehicles, especially larger families occupying four-bedroom homes. Visitor parking demand is therefore likely to exceed the available on-site provision.

As a result, overflow parking is likely to occur on Rogers Parade West and surrounding streets. This is particularly concerning because:

Rogers Parade West already experiences significant on-street parking.

Nearby schools generate substantial congestion during morning and afternoon peak periods.

The road is frequently used as a "rat run" by motorists seeking to avoid congestion on

surrounding arterial roads.
Additional parked vehicles will reduce road capacity, visibility and safety for pedestrians, cyclists and motorists.
Increased on-street parking may impede emergency vehicles, waste collection and service vehicles.
The proposal effectively transfers a portion of its parking demand onto surrounding residential streets rather than accommodating it within the development site.
Public Transport Accessibility
The site is not located within convenient walking distance of high-frequency public transport.
As a consequence, future residents are likely to remain heavily reliant on private vehicles for commuting, shopping and everyday activities. This increases the likelihood that traffic generation and parking demand have been underestimated.
Tree Canopy and Urban Heat
The proposal appears to substantially reduce landscaped and permeable areas compared with the existing site.
Reduced vegetation and tree canopy not only contribute to increased stormwater runoff but also reduce natural cooling, habitat values and neighbourhood amenity. Mature vegetation also plays an important role in intercepting rainfall before it reaches the drainage system.
Council should carefully consider whether adequate tree retention and replacement planting has been incorporated into the proposal.
Construction Impacts
Construction activities adjacent to the drainage corridor present additional risks to water quality through sediment and erosion.
Strict erosion and sediment control measures should be required throughout construction to prevent sediment entering the waterway and affecting downstream properties and ecological values.
Cumulative Planning Impacts
My principal concern is that this application appears to assess impacts only at the individual site level.
When considered together with the proposed development at 78 Rogers Parade West, the cumulative impacts become considerably more significant.
Collectively, these developments represent approximately 38 additional townhouse dwellings, accommodating around 120–140 additional residents, generating substantially more vehicle movements, increasing demand for on-street parking, reducing permeable ground cover and significantly increasing stormwater runoff into the same drainage corridor.
It is these combined impacts - not simply the effects of each development individually - that should be given significant weight in Council's assessment.
Development should occur in a manner that is sustainable and does not transfer environmental, flooding or infrastructure impacts onto neighbouring landowners or future generations. Council has an important responsibility to ensure that the cumulative consequences of multiple developments within the same catchment are properly assessed before approvals are granted.
Request
I respectfully request that Brisbane City Council:
Require a comprehensive cumulative stormwater, flooding and hydraulic assessment that considers both this proposal and the proposed development at 78 Rogers Parade West.
Ensure that post-development stormwater discharge will not increase flooding, erosion or drainage impacts on upstream or downstream properties.
Require the applicant to demonstrate that cumulative peak flows into the drainage easement and waterway will not exceed the existing capacity of the system.
Carefully assess the cumulative effects on the adjoining biodiversity corridor and require appropriate mitigation measures.
Review whether six visitor parking spaces are adequate for an 18-unit development comprising

predominantly family-sized dwellings.
Consider the cumulative traffic and parking impacts on Rogers Parade West, particularly in conjunction with existing school traffic and through traffic.
Ensure the proposal is consistent with the intent of the Brisbane City Plan regarding environmental protection, stormwater management, transport, neighbourhood amenity and sustainable development.
The cumulative impacts of increasing residential density within this catchment should be carefully considered before any approval is granted. While I support appropriate and well-planned development, I believe it should not occur at the expense of existing drainage capacity, the health of the adjoining waterway, the biodiversity corridor, the amenity of surrounding residents or the long-term resilience of local infrastructure.
Thank you for considering this submission.
Yours faithfully,