

Hi BCC Planning Team,

I am a resident of Doolandella and recently made a properly made submission regarding DA A00692490 (DAPublic-A006924490-20260429-17194; submitted 29 April 2026).

I am emailing to provide clarification on a few statements in the submission.

Under Section 4 (Road Network Function and Real-World Operation), I make a comparison *The proposed development introduces 5.5m internal roads-the same configuration already demonstrating failure-yet proposes to service significantly more dwellings (68 compared to ~21 on comparable streets)*.

I've realised this is unclear which 'comparable streets' I'm referring to. It is Albert St and Wimbledon Cl in Doolandella; these two roads are 5.5m (the same as the proposed development), and they service 21 Driveways/Dwellings, each with a double garage. The proposed development includes provision for 68 dwellings with no additional parking, all accessed via a 5.5m street. Wimbledon Cl and Albert St (and the section of Paddington St between them) are constantly congested with parked vehicles and effectively operate as single-lane roads.

In Section 5 (Parking Demand and Observed Conditions), I mentioned four dwellings that share which host 11 vehicles permanently for the residents; these are

These four houses alone have generated 3 additional vehicles that are parked on Albert and Paddington St, and this only grows when there are visitors. It is easier to accommodate here as we are directly opposite the Redhead St Parkland - we have no neighbours across the road which has lessened the parking demand on our little section of Albert St. I do not see how it is feasible to construct 68 dwellings all accessed from a road the same width as Albert St/Wimbledon Cl, with no additional parking available or even modelling/data as to how many vehicles will be parked on the street.

In Section 9 (Interaction with Service and Emergency Vehicles), I mentioned a near-conflict and would like to provide some additional detail. A garbage truck turning left from Albert St into Paddington St was required to veer onto the wrong side of the road due to parked vehicles at the intersection of Paddington St and Albert St. This created a situation where I had to brake suddenly and adjust position of my vehicle onto the kerb to avoid a frontal collision as I attempted to turn left from Paddington St into Albert St. While speeds are relatively low, the risk of such interactions is real. The driver was positioned on the Left Hand side of the truck and I don't believe they saw me

- there was certainly no attempt to slow or change their position on the road. Given how many parked vehicles are likely to be generated by the proposed development, there's a risk of this type of situation occurring often for residents and visitors.

In Section 7 (Safety Implications and Existing Risk Conditions), I mention the poor visibility when turning due to parked vehicles at the intersection of Paddington and Redhead Sts - this kind of turning action where drivers do not have a clear line of sight to oncoming traffic is now common in the area due to the number of parked vehicles. I wanted to provide a photo of this intersection to illustrate this point; it is taken from the position at which a driver must judge oncoming traffic, turning out of Paddington St and onto Redhead St.



I've also attached two video files of Paddington St showing vehicles having to use the wrong side of the road to travel around corners, both with reduced or no visibility of oncoming traffic.

I would appreciate this additional information being considered with regard to assessing the suitability and safety of the proposed development - thank you. I did have to shorten my submission by about 10% to meet the 20,000 character limit of your portal; I have also attached my original document which is a slightly longer but better submission (it is 21,232 characters including

spaces, 18,103 without spaces). It'd be great if you could consider this document in making your assessments.

I am happy to be contacted at any time if you would like further information or have any questions about any of the points I've raised (either related to this submission, or my submission against DA A006928472 nearby, which I also submitted on 29 April).

SUBMISSION

DA A006924490

**Submission regarding Development Application A006924490
Resident of Albert Street, Doolandella**

1. Introduction and Local Context

I am a resident of _____ and make this submission in objection to the proposed development in its current form.

My connection to the area is long-standing. My immediate family has resided on _____ May 2009, and I have personally lived within the immediate locality for approximately 12 of the past 17 years, including the past 3 years on Albert Street. This provides a clear basis to compare how the area has developed over time, and how the limitations of local infrastructure have become obvious due to the prevalence of smaller-lot development approvals occurring over time.

While the area has always been a suburban environment somewhat removed from major services and employment centres, it previously functioned well as a place to live. In recent years, however, the cumulative effect of multiple small-lot subdivisions has materially changed how the local road network operates. The result is a noticeable decline in ease of movement, increased congestion within local streets, and a reduction in safety at a very practical, day-to-day level. It should be noted that there are still several older properties in the immediate vicinity that are yet-to-be reconfigured, and the precedence of continued high-density approvals (and speed at which they are currently taking place) has real potential to erode liveability and make existing issues for local residents far worse.

This submission is not opposed to development in principle – it recognises that more land titles must be created within the limits of Brisbane City Council to adequately respond to the rapidly growing housing needs of our fast-growing city. It is opposed to development that does not deliver functional outcomes consistent with the intent of the Doolandella Neighbourhood Plan under the Brisbane City Plan 2014. The issue in this instance is not whether development should occur, but whether it is being delivered in a way that maintains a safe and workable suburban environment. Based on existing conditions and the daily lived experience of residents, it is not.

2. Cumulative Impact and Failure of Impact Assessment

A central issue with this application is the failure to meaningfully consider cumulative impact. The subject site is not an isolated parcel of land being introduced into an otherwise stable environment. It is part of a broader pattern of subdivision that has already transformed the locality.

Over the past several years, numerous reconfiguring a lot developments have been approved and constructed within a relatively small geographic area. These developments have consistently delivered small lot outcomes, generally in the range of 300 to 350 square metres, and at densities that exceed what would traditionally be expected for suburban detached housing. The effect of this pattern is now clearly visible in how local streets function.

It is no longer possible to treat each additional subdivision as a discrete event with negligible impact. The existing condition of the road network demonstrates that capacity has already been significantly eroded. Streets that were designed to operate comfortably as two-way local roads are now frequently constrained by parked vehicles, resulting in reduced carriageway width, inconsistent traffic flow, and increased conflict between road users.

Under the Planning Act 2016, an impact assessment is not limited to narrow compliance checks but may consider *any* relevant matter, including the actual performance of the surrounding network and the cumulative effect of development. In this case, the application does not do so. It relies on baseline assumptions that do not reflect the conditions that currently exist on the ground.

3. Density and Inconsistency with Neighbourhood Plan Intent

The proposed density of approximately 22 dwellings per hectare represents a clear departure from the intended outcomes of the Doolandella Neighbourhood Plan. The plan identifies lower density suburban outcomes in the order of approximately 12 dwellings per hectare, with slightly higher densities contemplated in specific mixed contexts. The proposal significantly exceeds those benchmarks.

The justification provided in the planning report relies on the presence of other developments in the area with similar densities. This is not a valid demonstration that the proposal aligns with accepted planning intent. The presence of multiple developments at similar densities does not confirm that those densities are appropriate; it indicates that a pattern of intensification has occurred.

The relevant planning question is whether the density can be accommodated while maintaining safe, functional, and efficient use of infrastructure. Based on observable conditions in the surrounding streets, the answer is no. The road network is already under strain, and increasing density further without addressing that constraint is inconsistent with the requirement for development to respond to the established pattern and capacity of the area.

4. Road Network Function and Real-World Operation

The application assumes that the road network will operate as designed. However, the actual operation of comparable streets in the locality demonstrates that this assumption is incorrect.

On streets with a carriageway width of approximately 5.5 metres, such as Wimbledon Street and Albert St, vehicle movement is constrained by parked cars. When a single vehicle is parked on the street, passing is possible but requires drivers to encroach into the opposing lane. This introduces uncertainty and requires drivers to make judgement calls about whether it is safe to proceed and which driver is going to give way.

Where vehicles are parked on both sides of the street, which is a common occurrence, often passage is no longer possible. I have personally had a situation recently on Wimbledon St where I could not pass two parked vehicles that were diagonally offset from each other on opposite sides of the road – and I drive a very small vehicle. I had to reverse into the intersection of Paddington St and Wimbledon St/Kokuso Pl, then continue on Paddington St to access my property. This occurred in the middle of the day – if at peak time, it would have been far more challenging and potentially dangerous. My small car simply would not fit between these two vehicles – forget two-way passage, single passage was impossible.

On slightly wider streets, such as Paddington Street, which has a carriageway of approximately 7.5 metres, similar constraints occur. When vehicles are parked on both sides, the road effectively functions as a single-lane corridor. Paddington St is very busy as an artery for many small-lot developments, and the necessity of drivers

to constantly assess how to get from one end to the the other, and who is going to give way, is *constant*. This is not an occasional occurrence; it is a routine condition at throughout the day and indeed the earlier evening.

These observations are important because the proposed development introduces internal roads of approximately 5.5 metres in width. This is the same configuration that is already demonstrating operational failure in the surrounding area. The application does not provide any evidence to demonstrate that these roads will function differently within the development than they do elsewhere in the locality. Wimbledon St and Albert St (both 5.5m wide) provide access to 21 driveways/properties whereas the new road (also 5.5m wide) proposed in this development services 68 properties. Thus, if any conclusion were to be made to this point, the function of this new road will be significantly worse than existing comparable examples nearby with regards to safe passage and ease of access for residents, visitors, and other vehicles such as garbage trucks, emergency services, deliveries, and vehicles/trucks involved in construction.

5. Parking Demand and Observed Conditions

The assumptions underpinning the proposal do not reflect actual parking demand in the area. Standard planning assumptions typically allow for one or two vehicles per dwelling, with some allowance for visitors. In practice, this does not align with how households in this locality operate.

It is common for households in this area to contain multiple adults, each with their own vehicle. As a result, three or more vehicles per dwelling is not unusual. On Albert Street, for example, I share a frontage with 3 other properties. These 4 dwellings collectively accommodate eleven vehicles (2 with x2 cars, 1 with 3 cars, and 1 with 4 cars), and when visitors are here - which is frequent on our street - the number is greater. This is not an isolated case but indicative of a broader pattern. It is already challenging on my narrow st – but my property is located opposite a protected bushland reserve, so I have no neighbours across the street. If I did, this problem would be worse.

Because on-site parking capacity is limited (due to garage space often being insufficient and land sizes being too small to accommodate private parking on title), excess vehicles are parked on the street. This results in both sides of streets being occupied at various times, particularly in the early morning and evening periods when most residents are at home. Verge parking also occurs where space permits. Again, this is with only one side of the road being occupied by dwellings.

The effect of this parking demand is to reduce the effective width of the carriageway, which in turn constrains vehicle movement and reduces safety margins. The proposal does not adequately account for this. It assumes that compliance with minimum on-site parking requirements is sufficient, without assessing how parking will actually be distributed or how it will interact with traffic movement.

6. Traffic Impact Assessment – Failure to Reflect Real Conditions

The traffic impact assessment supporting the application is not sufficient for an impact-assessable development of this scale and context.

The report relies on generic trip generation rates and presents the resulting traffic volumes as negligible. One example is the characterisation of traffic as “less than one vehicle movement per minute.” This figure is derived by averaging total movements across an hour, which does not reflect how traffic actually behaves.

In reality, vehicle movements that are concentrated into peak periods do not occur at regular cadences – they are clustered. Morning departures typically occur within a relatively short window as residents leave for work or school. Similarly, afternoon and evening arrivals are clustered as residents return home. These concentrated

periods result in multiple vehicles entering and exiting the street network within short timeframes, increasing the likelihood of conflict at intersections and along constrained sections of road.

The assessment does not model these peak conditions adequately. It also does not account for the fact that roads in the locality do not operate at full design width due to parked vehicles. By assuming an unconstrained carriageway, the report effectively assesses a network that does not exist in practice.

In addition, the assessment does not consider cumulative development. It does not incorporate traffic generated by recently approved or completed subdivisions, nor does it consider future development that is already proposed in the area. This omission further reduces the reliability of the conclusions.

Taken together, these limitations mean that the traffic assessment significantly understates the real impact of the development.

7. Safety Implications and Existing Risk Conditions

The conditions described above have direct safety implications. The need for vehicles to encroach into opposing lanes, combined with limited visibility at bends and intersections, creates an environment where drivers are required to make frequent judgement calls under constrained conditions.

At the intersection of Paddington Street and Redhead Street, for example, visibility is often reduced due to parked vehicles. Turning movements require careful positioning, and drivers often do not have a clear line of sight to oncoming traffic. This is particularly problematic in poor weather or low-light conditions.

These are not isolated issues but part of the everyday experience of navigating the local road network, and the problem is rapidly becoming more severe. The proposed development will introduce many additional vehicles into this environment and replicate the same constrained street design internally. As further developments of this type are approved, these conditions will become more frequent and more pronounced.

8. Public Transport and Structural Car Dependence

The application suggests that the area is reasonably serviced by public transport. This does not reflect how transport is actually used by residents.

Bus services in the area are limited in frequency and do not provide direct or efficient connections to major employment centres. Travel times using public transport are significantly longer than those achievable by private vehicle. As a result, the majority of residents rely on cars for daily travel.

This reliance is not a matter of preference but a function of the available infrastructure. It leads directly to higher rates of vehicle ownership and increased demand for parking. Any realistic assessment of traffic and parking impacts must account for this. The current proposal does not do so.

9. Interaction with Service and Emergency Vehicles

The issue of service and emergency vehicle access extends beyond whether these vehicles can physically enter the street network. It also concerns how their presence affects overall safety.

Larger vehicles such as garbage trucks require more space to manoeuvre and often need to occupy a greater portion of the carriageway when turning. In an environment where the effective road width is already reduced by parked cars, this can result in vehicles crossing into opposing lanes.

A recent incident on Albert Street illustrates this. A garbage truck turning left from Albert St into Paddington St was required to veer onto the wrong side of the road due to parked vehicles. This created a situation where I had to brake suddenly and adjust position of my vehicle to avoid a frontal collision as I attempted to turn left from Paddington St into Albert St. While speeds are relatively low, the risk of such interactions is real.

The proposal does not address how these interactions will be managed within an already constrained network.

10. Conclusion

The proposal fails to demonstrate that it can be accommodated within the existing road network while maintaining safe and functional conditions.

The evidence from the surrounding locality shows that:

- current street designs are already operating under constraint
- parking demand exceeds available capacity
- traffic movement is inconsistent and often compromised
- safety margins are reduced as a result

The application relies on assumptions that do not reflect these conditions and does not provide sufficient analysis to support its conclusions.

This is not a minor or speculative issue. It is a clear and observable mismatch between the intensity of development being delivered and the capacity of the supporting infrastructure.

11. Requested Outcome

For the reasons outlined above, I respectfully submit that the proposed development should **not be approved in its current form**.

The application, as submitted, does not adequately demonstrate that the development can be accommodated within the existing road network while maintaining safe, functional, and efficient conditions. The supporting material relies on assumptions that do not reflect how the locality actually operates, and it does not sufficiently address the cumulative impact of recent and ongoing development in the surrounding area.

If the application is to be further considered, it would require a **substantial and comprehensive reassessment of both the design and the supporting technical analysis**, such that the proposal can be properly evaluated against the intended outcomes of the planning framework and the demonstrated constraints of the locality.

In that context, it is reasonable to expect that the following matters are addressed in a revised proposal:

11.1 Density and Yield

A reconsideration of the proposed density would be appropriate, having regard to the intended outcomes of the Doolandella Neighbourhood Plan and the demonstrated limitations of the surrounding road network. It would

be necessary to clearly demonstrate that the level of development can be supported without further degrading traffic function, parking availability, or residential amenity.

In particular, reliance on surrounding approvals as justification should be approached with caution. It would be important to establish, through evidence, that the proposed density represents an appropriate outcome in its own right, rather than a continuation of an emerging pattern that may already be exceeding the capacity of local infrastructure.

11.2 Road Network Design

A revised road layout and design approach would be warranted to ensure that streets can operate safely under realistic conditions, including the presence of on-street parking. It would be important to demonstrate that effective carriageway width is sufficient to support two-way vehicle movement in practice, not just under idealised conditions.

Given the observed performance of comparable 5.5 metre carriageway streets in the locality, particular attention should be given to how the proposed design responds to those known constraints, rather than replicating them.

11.3 Parking Demand and Provision

A more detailed and locality-specific assessment of parking demand would be necessary to establish whether the proposal adequately reflects actual vehicle ownership patterns. This should include consideration of multi-adult households, visitor parking, and the likely extent of on-street parking demand.

It would also be important to demonstrate how parking demand will be accommodated without compromising traffic flow, reducing effective carriageway width, or creating additional safety risks.

11.4 Traffic Impact Assessment

A revised traffic assessment would be expected to provide a more realistic representation of how the network will operate. This would ideally include:

- analysis of peak period traffic movements, rather than reliance on averaged hourly rates
- consideration of cumulative development in the surrounding locality
- modelling of how constrained road widths, particularly where on-street parking is present, affect network performance
- assessment of intersection operation under realistic traffic conditions

Such an approach would provide a more reliable basis for understanding the true impact of the development.

11.5 Demonstration of Safe Operation

Further analysis would be appropriate to demonstrate that the development can operate safely in practice, taking into account the conditions that currently exist in the locality.

This would include consideration of:

- vehicle passing behaviour on constrained streets
- sightlines at intersections and bends

- interaction between vehicles, pedestrians, and cyclists
- driver behaviour under conditions where road width is reduced

It would be important that this analysis is grounded in observed conditions rather than purely theoretical design assumptions.

11.6 Service and Emergency Vehicle Interaction

Consideration should be given not only to whether service and emergency vehicles can access the development, but also how their operation will interact with general traffic under constrained conditions.

This would include demonstrating that:

- larger vehicles can manoeuvre safely without requiring significant encroachment into opposing lanes
- their presence does not introduce additional conflict points or safety risks
- the combined effect of large vehicle movements and on-street parking has been appropriately considered

11.7 Explicit Consideration of Cumulative Impact

A more explicit and transparent assessment of cumulative impact would be appropriate, incorporating recently approved, constructed, and proposed developments within the surrounding area.

Such an assessment should demonstrate that the combined effect of development does not exceed the functional capacity of the road network or result in unacceptable safety outcomes. Without this, it is difficult to properly understand the true impact of the proposal.

11.8 Alignment with Neighbourhood Plan Outcomes

Finally, it would be important for the proposal to clearly demonstrate alignment with the intent of the Doolandella Neighbourhood Plan, particularly in relation to:

- safe and efficient vehicular movement
- functional and integrated residential communities
- development that responds to the established pattern and infrastructure capacity of the area

At present, this alignment has not been convincingly demonstrated.

Until these matters are addressed in a comprehensive and evidence-based manner, it is not possible to conclude that the proposal represents an appropriate or sustainable development outcome for this locality.