



FW: Subject: Submission - Objection to Development APPLICATION A006894483

From dalodgement <dalodgement@brisbane.qld.gov.au>
Date Tue 3/02/2026 10:20 AM
To CPEDS-DS-PlanningSupport <CPEDS-DS-PlanningSupport@brisbane.qld.gov.au>
Cc DA RECORDS <DA_RECORDS@brisbane.qld.gov.au>

SECURITY LABEL: OFFICIAL

Sent: Tuesday, 3 February 2026 10:07 AM
To: dalodgement <dalodgement@brisbane.qld.gov.au>
Cc: DA RECORDS <DA_RECORDS@brisbane.qld.gov.au>
Subject: Subject: Submission - Objection to Development APPLICATION A006894483

This email originates from outside of Brisbane City Council.

Address: [12 Croxley Street, Upper Mount Gravatt QLD 4122](#)

Dear Assessment Manager,

I am writing to lodge a formal objection to the above development application for a reconfiguration of a lot (1 into 2 lots) at [12 Croxley Street, Upper Mount Gravatt](#).

My objection is made on planning grounds and relates to non-compliance with the Brisbane City Plan 2014, unacceptable impacts on residential amenity, and insufficient information to properly assess the proposal.

1. Non-compliance with minimum lot size provisions

The subject site has an area of 607 m² and is proposed to be subdivided into two lots of approximately 303 m² each. The application material confirms that both proposed lots are below the generally anticipated minimum lot size of 400 m² for the Low density residential zone.

While the applicant argues that the site is only marginally outside the 200 m walking distance threshold to a centre, the planning scheme clearly establishes this threshold as a benchmark for determining whether reduced lot sizes are appropriate. The proposal does not meet this benchmark and therefore relies on a discretionary departure rather than clear compliance.

1A. Arguments against supporting the discretionary departure

The proposed departure from the anticipated minimum lot size provisions should not be supported for the following reasons:

1. **The 200 m walking distance threshold is a deliberate and meaningful benchmark**, intended to ensure that higher intensity development is located in areas with genuinely convenient access to centres and services. Accepting a proposal that exceeds this threshold weakens the clarity and certainty of the planning framework.
2. **The proposed lots are materially smaller than the anticipated minimum**, at approximately 303 m² compared with the 400 m² benchmark. This represents a significant quantitative departure rather than a minor or technical non-compliance.
3. **Approval would undermine the intent of the Low density residential zone**, which seeks to maintain a low-density suburban character defined by larger lots, lower intensity development, and reduced amenity impacts.
4. **Reliance on nearby sub-400 m² lots does not justify further intensification**, particularly where cumulative impacts have not been assessed. Past approvals should not be treated as automatic precedent where they risk eroding the intended character of the area over time.
5. **The functional outcomes of the planning scheme are not adequately demonstrated at subdivision stage**, with no dwelling design, noise assessment, traffic assessment, or enforceable controls provided to ensure acceptable future built form and amenity outcomes.
6. **Supporting the departure would set an undesirable precedent**, increasing pressure for similar applications in the surrounding area and resulting in incremental change that has not been strategically planned or publicly consulted on.

2. Likely adverse impacts on residential amenity

The creation of two small lots in this location is likely to result in amenity impacts that are inconsistent with the expectations of the Low density residential zone, including:

- **Increased noise impacts**, arising from closer building setbacks, reduced separation between dwellings, and intensified use of the site compared with a single dwelling;
- **Increased traffic generation** on Croxley Street, including additional vehicle movements, on-street parking demand, and potential conflicts with existing driveways;
- **Reduced private open space and landscaping opportunities**, which are typical consequences of small lot development and detract from the established suburban character.

These impacts are not adequately addressed in the application material and have the potential to result in adverse effects on the amenity of adjoining properties and the wider streetscape.

3. Lots of insufficient size to comfortably accommodate future development

Although the application suggests that future dwellings could be accommodated on the proposed lots, the reduced lot size significantly constrains future building outcomes. Smaller lots typically lead to bulkier building forms, reduced setbacks, and limited opportunities for meaningful landscaping, which is inconsistent with the prevailing character of the area.

The subdivision should be assessed not only on its own merits, but on the likely built form outcomes it enables, which in this case are unlikely to align with the intent of the Low density residential zone.

4. Incomplete driveway crossover information

Council's information request dated 24 November 2025 confirms that the application does not include adequate driveway crossover information and does not sufficiently address **AO3.2 of the Subdivision code**.

Specifically, the proposed plans do not show the driveway crossover for each lot, and Council has requested amended plans to demonstrate compliance with BSD-2022 standards. Until this information is provided, it is not possible to properly assess access arrangements, impacts on street trees, services, or on-street parking.

This lack of information further supports the view that the application is premature and should not be approved in its current form.

5. Conclusion

For the reasons outlined above, I submit that the proposed subdivision:

- Does not comply with the anticipated minimum lot size provisions of the Low density residential zone;
- Relies on a discretionary departure that is not justified on planning grounds;
- Is likely to result in adverse amenity impacts, including increased noise and traffic;
- Creates lots that are too small to comfortably accommodate future development consistent with neighbourhood character; and
- Lacks sufficient information regarding driveway crossovers to enable proper assessment.

Accordingly, I respectfully request that Brisbane City Council refuse the application.

PS PAPER DOCUMENT POSTED 28 JANUARY 2026