



sustainability

innovation

community dividend

design excellence

Our ref: 16-003

31 October 2016

Neighbourhood Planning Brisbane (Coorparoo and Districts Neighbourhood Plan)
Brisbane City Council
GPO Box 1434
Brisbane Qld 4001

Via email: neighbourhood_planning@brisbane.qld.gov.au

Dear Sir / Madam,

Re: Submission about the Coorparoo and Districts – Draft Neighbourhood Plan Strategy

Congratulations on releasing the draft Coorparoo and Districts Neighbourhood Plan Strategy and the significant community consultation that Brisbane City Council has undertaken to date.

We support your efforts to engage with the community in this vital discussion about the Coorparoo and Districts, and together create a vision for this part of our city to grow and prosper in a thoughtful, reasoned, measured and sustainable way.

YIMBY Qld

YIMBY Qld, or Yes In My Backyard Queensland, is all about encouraging good development outcomes that enhance everyday life. We believe good development outcomes feature at least one of these four YIMBY Qld qualities being: Design Excellence, Sustainability, Innovation and Community Dividend.

We recognise that Coorparoo and Districts is an established urban area with some quieter neighbourhoods. However, the area is also within 4km of the CBD making it highly accessible to employment, educational and shopping precincts and as such, an ideal location to accommodate growth. Suitable locations for growth within the neighbourhood plan area have already been identified in Brisbane City Plan 2014 as:

- Along the Logan Road transport corridor;
- Future growth nodes at Greenslopes, Greenslopes Mall and Holland Park.

With this in mind, we have reviewed the Coorparoo and Districts Draft Neighbourhood Plan Strategy and support the following strategies:

- Encouraging new housing to meet the needs of families and locals looking for smaller, low-maintenance homes such as students, medical staff at Greenslopes Private Hospital and the growing number of seniors in the area who want to downsize without moving away;
- Removing the Traditional Building Character overlay in the places identified within the draft plan where units and apartments can be located close to public transport corridors and centres and where the streetscape has already been transformed;
- Encouraging the area's three main centres to grow by allowing business and commercial uses to be built above the shops;
- Encourage overlooking and direct access to parks by allowing medium-density residential development next to larger parks; and
- Encouraging greener, more sustainable multi storey development that is built for Brisbane's climate, with green features such as rooftop gardens and green walls. We support good development outcomes that allow our city to breath and offer innovative design solutions.

We believe, however, that the strategy could better promote innovative, vibrant development outcomes for this neighbourhood, in line with the vision for Brisbane.

Promoting Good Development

To facilitate and inspire good development outcomes, with design excellence, innovation, sustainability and community dividend, we recommend that the strategy give further consideration to:

1. Land Use and Density

We are of the view that further consideration needs to be given to land use and density in suitable locations within this inner urban living area. As identified by City Plan 2014, there are suitable locations where increased opportunities should be made available for higher density residential and mixed use development. Heights and densities should be unlocked to take advantage of the area's locational attributes, including its proximity to the busway, motorway, schools, shops, parks and major employers (Greenslopes Private Hospital).

Being only 4km from the Brisbane CBD, Coorparoo and Districts is a prime location to support higher density development to improve efficiency and sustainability in our use of land, promote walkable neighbourhoods, improve access by proximity, support affordable living and increase vitality within our city.

The draft strategy plan identifies that "building heights up to five to eight storeys along Logan Road are acceptable" to the Community Planning Team. However, the draft plan strategy only allows for a maximum of 6 storeys in the locations that City Plan

2014 has identified as future growth zones (Greenslopes, Greenslopes Mall and Holland Park).

The recently released, *Shaping SEQ – Draft South East Queensland Regional Plan* identifies that an increased number of infill dwellings are required to accommodate the region’s growth. In addition, it also focuses on the importance of delivering a greater range of ‘missing middle’ housing forms in suitable locations, such as 6 storey medium-rise apartments.

Considering the draft regional plan requirements, we question whether the combination of the proposed zoning and intended building heights (Up to 6 storeys in existing shopping precincts and district centre zones and only 5 storeys in Medium-Density Residential and Mixed Use Zones) will be sufficient to accommodate future growth, particularly the crucial, ‘missing middle’ housing supply.

2. Transition Rear Setback Requirements

The draft strategy introduces new transition rear setback requirements for proposed development next to low density residential zones as identified in the following table:

Proposed Development	New Rear Transition Setbacks for Coorparoo and Districts	Existing City Plan 2014 – Multiple Dwelling Rear Setback Requirements
Mixed Use - 5 storeys when next to Low Density; OR Medium Density Residential - 5 storeys when next to Low Density	<ul style="list-style-type: none"> • 12m to balcony for upper 2 storeys • 9m to balcony for the first 3 storeys 	<ul style="list-style-type: none"> • 6m to balcony for the upper 3 storeys • 4.5m to balcony for the first 2 storeys

The proposed rear transition setbacks for the neighbourhood planning area are considered excessive in comparison to the existing City Plan 2014, Multiple Dwelling rear setback requirements. Privacy, amenity and deep planting outcomes can be achieved through excellent design outcomes without having to introduce additional rear setback restrictions.

YIMBY Qld is concerned with the creep of additional planning restrictions, which individually may not seem significant but when combined are overburdening development to the point that it is impacting on affordability.

We encourage the testing of all existing and new planning scheme provisions to ensure that each one adds value and aligns with the strategic planning framework. Having lengthy codes and new, onerous provisions impacts on housing affordability and is incompatible with Council's vision for planning and development in our city to "prepare effectively for population and employment growth and demographic change" (Brisbane Vision: <https://www.brisbane.qld.gov.au/about-council/governance-strategy/vision-strategy/brisbane-vision/our-well-designed-subtropical-city>).

3. Design excellence, Innovation, Sustainability and Community Dividend

We believe further consideration needs to be given to the way in which the area can encourage and facilitate good development outcomes that inspire the community and visitors alike, while positively contributing to Brisbane's competitiveness as a 'New World City' on the global stage.

The combination of the proposed zoning, intended building heights and additional rear setback limitations in prime growth locations does not give adequate consideration to the incentives and flexibility required to accommodate further growth and to inspire projects that deliver above and beyond minimum standards.

Recommendations

We recommend:

- Allowing up to 8 storeys in areas identified in the draft plan for heights up to 6 storeys (e.g. existing shopping precincts, and the District centre zone) or introducing a High Density Zoning in these locations;
- Allowing up to 6 storeys in areas identified in the draft plan for heights up to 5 storeys (e.g. Medium-Density Residential Zone and Mixed Use Zone up to 5 storeys);
- Adopting rear setback requirements as per the current City Plan 2014 Multiple Dwelling Code requirements;
- Incorporating incentives for excellence in design, innovation and sustainability through reduction in levels of assessment and / or introduction of height bonuses built into acceptable outcomes, to better embrace local and global opportunities when they arise; and
- Incentivizing the delivery of increased community dividend eg. additional open space, plazas, public art and connectivity through reduction in levels of assessment and / or recognition as a performance outcome to support development otherwise not anticipated under the planning scheme.

Role of YIMBY Qld

We offer our input as a positive voice in the urban development conversation, celebrating good development and the important community benefits that flow as a result, and would appreciate the opportunity to be further involved in the Neighbourhood Plan consultation.

Please do not hesitate to contact me should you have any queries.

Yours sincerely,
YIMBY Qld

A handwritten signature in black ink that reads "Natalie Rayment". The signature is written in a cursive, flowing style.

Natalie Rayment
Co-Founder