



sustainability

innovation

community dividend

design excellence

Our ref: 17-003

13 March 2017

Neighbourhood Planning (Dutton Park-Fairfield)
Brisbane City Council
GPO Box 1434
Brisbane Qld 4001

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

Dear Sir / Madam,

Re: Submission about the Draft Dutton Park-Fairfield Neighbourhood Plan

Congratulations on releasing the draft Dutton Park-Fairfield 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 Dutton Park/Fairfield area, 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 Dutton Park and Fairfield are established urban areas with tracts of character housing. However, the northern area is also within 1.5km 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:

- Brisbane South Rail Transport Corridor
- Planned growth node at Fairfield

With this in mind, we have reviewed the draft Dutton Park-Fairfield Neighbourhood Plan and support the following strategies:

- Providing for the expansion of regionally significant health and knowledge uses by support for building heights up to 20 storeys;
- Removing the Traditional Building Character overlay in the places zoned Low Medium Density where the streetscape has already been transformed;
- Promoting increased densities for residential development on sites near railway and busway precincts

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 considers:

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 railway, busway, future public transport stations, motorway, schools, shops, parks and major employers (Mater Hospital, Lady Cilento Children's Hospital, Princess Alexandra Hospital, the University of Queensland and the Ecosciences Precinct).

At its southernmost point, this Neighbourhood Planning area is less than 5kms from the Brisbane CBD. It 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 plan states that "higher density development will be encouraged through proposed catalyst sites and precincts". The intention of this focused growth is to protect traditional building character housing in other parts of the neighbourhood planning area. However, in much of the proposed catalyst sites and precincts intended for residential uses, densities are limited to 5-12 storeys.

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, a key strategy of the draft regional plan is to focus density so that "higher density development is located in areas with good access to high-frequency public transport, employment and services".

Considering the draft regional plan requirements, we question whether the combination of the proposed zoning and intended building heights will be sufficient to accommodate future growth, particularly in an area that is already identified in the planning scheme as a planned growth node, features access to high-frequency public transport, major employment nodes, regional services and will be home to future public transport stations.

In particular, limiting the building height of development to 9 storeys in the Boggo Road Urban Village North severely restricts the potential for transit-oriented development in this sub-precinct. This is despite the sub-precinct being ideally located for higher density development being directly adjacent to the Boggo Road Busway Station, the Park Road Railway Station and a future public transport passenger station.

There appears to be a contradiction in the draft plan in relation the proposed maximum building heights of the Boggo Road Urban Village north sub-precinct (Dutton Park-Fairfield neighbourhood plan/NPP-002a as stated in Table 7.2.4.3.4:

Table 7.2.4.3.4– Maximum building height in storeys

	Building height (number of storeys)		
Site area	800m to less than 1,200m ²	1,200m ² to <2,500m ²	2,500m ² or greater
Site frontage	20m	20m to 30m	30m
If in the Boggo Road Urban Village north sub-precinct (Dutton Park-Fairfield neighbourhood plan/NPP-002a)			
Development of a site in the Mixed use Corridor zone precinct	12 storeys (refer note)		

Note—Separate [setback](#) and [building height](#) requirements apply to sites in the Boggo Road Urban Village North sub-precinct that adjoin or are located within 40 metres of a site in the Community Facilities - Education Purposes zone precinct in accordance with [AO11.1](#).

The table allows for 12 storeys except where a site in the sub-precinct adjoins or is located within 40 metres of a site in the Community Facilities - Education Purposes zone precinct in accordance with AO11.1. Draft acceptable outcome 11.1 does not include any references to setbacks or building height. It is presumed that the relevant acceptable outcome is A012.1.

A012.1 states that “development in the Boggo Road Urban Village North sub-precinct where adjoining, or within 40 metres of, a Community Facilities Education purposes zone precinct has a building height of no more than nine storeys”. However, there is only one lot in sub-precinct NPP-002a: Lot 1 on SP217441. It is within 40 metres of a site zoned Community Facilities – Education Purposes. As such, the 12 storey building height listed in Table 7.2.4.3.4 contradicts the 9 storey building height of A012.1.

2. Transition Rear Setback Requirements

The draft plan introduces new transition rear setback requirements for proposed development in the Boggo Road Urban Village South sub-precinct where adjoining the Character Residential Zone as stated in A012.2:

- (a) 10 metres where for the first 2 storeys or 7 metres
- (b) 15 metres where exceeding 2 storeys in height.

The proposed rear transition setbacks for the NFF-002b sub-precinct 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 15-20 storeys in areas identified in the draft plan as catalyst sites and precincts or introducing High Density Zoning in these locations;

- Allowing up to 20 storeys in the NPP-002a Boggo Road Urban Village North sub-precinct
- 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



Natalie Rayment

Co-Founder