



sustainability

innovation

community dividend

design excellence

Our ref: 17-002

03 March 2017

Draft South East Queensland Regional Plan Review Feedback  
Department of Infrastructure, Local Government and Planning  
PO Box 15009  
CITY EAST QLD 4000

**Via email:** [SEQRegionalPlan@dilgp.qld.gov.au](mailto:SEQRegionalPlan@dilgp.qld.gov.au)

Dear Sir / Madam,

**Re: Submission on ShapingSEQ - Draft South East Queensland Regional Plan**

## 1 Introduction

Thank you for the opportunity to review and comment on the Draft South East Queensland Regional Plan (SEQRP) currently open for public comment. The opportunity to provide feedback on the Draft document is appreciated.

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.

## 2 General Comments on Draft SEQRP

We support the following approach, principles and policy outcomes of the draft SEQRP:

- Adopting a 50-year horizon within the visioning for SEQ
- Planning for expected population and associated dwelling demand for the next 25 years
- Focusing the majority of new development in our existing urban areas but recognising the importance of including additional greenfield land releases not only for reasons of housing choice but also to ensure that the plan does not put at risk land supply constraints placing upward pressure on house prices

- Including both new dwelling and employment targets and considering the associated infrastructure requirements
- Acknowledging the difference between housing affordability and affordable living and including commentary to assist the community in their understanding of how land use and planning decisions influence the cost of living and
- Recognising the need to plan for and deliver a greater range of 'missing middle' housing forms and ensure infill dwelling targets can be realistically met while providing for housing choice across the full spectrum of housing densities, types and forms.

Our concerns, however, relate to:

- The extents to which the 50 year vision challenges current thinking, considering the pace of change and disruption expected, particularly in relation to future city form and community expectations
- Whether there are sufficient greenfield land development opportunities unlocked to properly offset the potential pressure that land supply constraints will place on housing prices, particularly given the strict prohibition imposed on subdivision and other forms of new residential development outside the Urban Footprint
- How the plan will deliver on its policy in relation to increasing the extent of infill housing development, particularly the delivery of a greater range of 'missing middle' housing forms, without addressing this in the regulatory provisions which could have the power to unlock and de-risk infill development opportunities and
- Whether the document, including the vision and explanatory texts, sufficiently demonstrates to the wider community the implications of the decisions made in relation to the extent and distribution of new development (i.e. the infill / greenfield split) on community expectations about the character and amenity of our established urban areas and how these expectations will need to change and evolve.

We therefore believe it is imperative that the plan clearly outline this reality to the community, be bold in its vision given the 50 year horizon, and ensure that this vision is properly delivered through the regulatory provisions, both in prohibiting inappropriate sprawl but also in unlocking positive infill development outcomes.

### **3 Specific Comments on the Vision**

While having a 50 year vision horizon is commended, it lacks narrative about imagining what the SEQ region of 2066 may look and feel like, what the community sentiment may be in relation to development and growth and what potential impact new technology will not only have on how we plan for jobs, commerce and retailing, and housing. For example, we are already experiencing a new way of thinking in relation to autonomous vehicles, yet the vision is silent on what this is likely to mean for our city form.

The vision also discusses increased urbanism but does not acknowledge that to achieve this, existing community expectations and values in relation to development density, mx and height are likely to change and evolve as our value set adapts to an increasingly urbanised environment. Within the next 50 years, communities will need to welcome new developments like they welcome a new neighbour, and embrace the benefits that developments have on their amenity and lifestyle.

#### **4 Specific Comments on Draft State Planning Regulatory Provisions**

While the regulatory provisions are a powerful tool to prevent sprawl or limit greenfield growth, there is no accompanying measure to unlock the ‘tall’ – infill development opportunities and the missing middle housing types.

Additional development within established urban areas will no doubt spark the interest of communities and community groups who, more commonly than not, oppose additional housing densities and increased height and associated impacts including traffic, parking and noise in their neighbourhood, despite the need for housing and the jobs it creates, as well as the lifestyle precincts and other community benefits it delivers. This typically negative sentiment towards development comes at a cost on housing, through factors including delay, risk and increased layers of regulation.

Given a focus on increased infill development over greenfield opportunities is at the cornerstone of the draft SEQRP, it is disappointing that the State Planning Regulatory Provisions do not respond pro-actively by unlocking and de-risking infill development, particularly in our emerging and low density residential areas.

A simple amendment to ensure all suburban residential neighbourhoods, particularly in the major cities, accommodate at minimum self-assessable dual occupancy outcomes, rather than only single family dwellings, is one example of how the regulatory provisions could assist in the delivery of increased infill development to meet the anticipated population projection and dwelling demand.

While one additional dwelling per lot is a small step towards fulfilling the significant infill development targets, low density suburban neighbourhoods represent the largest land holdings in the majority of urban local government areas. In Brisbane City Council, for example, dual occupancy development is impact assessable and inconsistent in low density residential neighbourhoods, despite the ‘Fonzie Flat’ being an acceptable form of low density suburban housing in the community psyche since the 1950s. Unlocking other higher density forms of housing through the regulatory provisions is also supported.

- In relation to how the State Planning Regulatory Provisions prohibit 'sprawl' or further greenified development outside the mapped Urban Footprint, our concern is that the new areas identified for greenfield growth in the draft SEQRP are not sufficient to appropriately accommodate housing choice, but also to ensure that the plan does not put upward pressure on house prices because of land supply constraints.

## 5 Conclusion and Recommendations

Our preference would instead be to:

- Better inform the community of the future vision for our cities and suburbs, outlining realistic expectations for what the intended infill development outcomes will mean in established communities, and the associated benefits
- Facilitate the intended infill growth targets by unlocking opportunities for the missing middle housing forms in areas currently only zoned for single family dwellings eg. enforce dual occupancy as self-assessable in low density areas where compliant with applicable codes and
- Increase the supply of new greenfield land to more realistically de-risk supply issues from placing significant upward pressure on housing prices and limiting housing choice.

Thank you for your consideration of our submission. Please do not hesitate to contact me should you have any queries or wish to discuss any of these matters further.

Yours sincerely,

**YIMBY Qld**



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Natalie Rayment

Co-founder