



sustainability

innovation

community dividend

design excellence

Our ref: 16-004

21 September 2018

Strategic Planning, City Planning and Economic Development  
Brisbane City Council  
GPO Box 1434  
BRISBANE QLD 4001

***Online submission***

Dear Sir / Madam,

**Re: Submission on Draft Citywide Amendment to City Plan 2014 on Retirement and Residential Care Facilities**

**Introduction**

Congratulations on releasing the draft Citywide amendments to City Plan 2014 relating to the development and growth of retirement and residential care facilities. Thank you for the opportunity to provide feedback on the draft amendments.

We believe in the ability to age in place, with a variety of housing options available at a variety of price points, in all neighbourhoods within our City. We value the importance of having housing options available in your neighbourhood through all phases of the life cycle, to reduce displacement and segregation. The importance of this planning principle has been heightened given the growing awareness of the impact of loneliness from a community health perspective. We therefore strongly support planning policy changes that protect and enhance the ability to age in place.

We therefore support your efforts to engage with the community regarding the development and growth of the retirement and aged care sector in Brisbane, and to reduce the red tape and improve incentives for good development outcomes in this sector. We believe more can be done to continue to improve these housing options for all.

## **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.

### **General Comments on Proposed Amendments**

We support the initiative to provide more tailored provisions in City Plan 2014 regarding retirement and aged care living. In particular, we support:

- opportunities for Retirement and Residential care facilities to be established in Suburban living areas, including Code assessment in the Low density residential zone;
- improving opportunities to co-locate care related activities within new and existing Retirement and Residential care facilities; and
- incentives to reduce red tape and financial costs associated with providing Retirement and Residential care facilities.

However, our concerns include:

- the amendments do not appear to unlock opportunities for alternative housing solutions for older persons, particularly those not yet reliant upon the formal structure of an integrated Retirement or Residential Care facility, such as smaller lower maintenance residential lots, duplexes and auxiliary dwelling units to enable income earning capacity through a secondary dwelling;
- the amendments do not reduce car parking provisions, despite the important role planning policy can have in encouraging behaviour changes.

In relation to car parking provision, we strongly believe there is a great opportunity to encourage behaviour change regarding reliance on private vehicles, through this policy. While we understand further work is being undertaken by Brisbane City Council in terms of studying parking demand for these types of facilities, we recommend that a policy led approach be adopted to encourage behaviour change, rather than a behaviour led approach to writing policy for our New World City.

### **YIMBY Qld Qualities of Good Development**

We support the vision and guiding frameworks as discussed above because they align with some of the four YIMBY Qld qualities that indicate good development outcomes.

We recognise that the delivery of community dividend is a strong component of the amendments, particularly in relation to providing better retirement and aged care outcomes for our communities, including the ability to age in place and create walkable neighbourhoods for residents.

Innovation also appears to be a feature of the draft, as evidenced by the focus on incentivising co-location of care related facilities. In our opinion, these facilities should be further incentivised through reductions in car parking provision given the co-location benefits that improve walkability and reduce reliance on private vehicles.

However, we believe further work can be done. The draft amendments appear to be relatively silent on design excellence and should incentivise world-leading architecture, landscape and urban design outcomes. Sustainability should also be further encouraged in the draft, through additional incentives for sustainability features such as reduced resource usage of water energy and materials.

## **Conclusion**

Congratulations again on releasing the Draft amendments for consultation. We look forward to seeing some of the exciting features of the amendments being brought to life and the liveability improvements that they will bring to our New World City.

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