



sustainability

innovation

community dividend

design excellence

Our ref: 16-004

21 August 2019

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

Email submission: Strategic.Planning@brisbane.qld.gov.au

Dear Sir / Madam,

Re: Submission on Draft Major Amendment Package H to City Plan 2014

Introduction

YIMBY Qld requests that you do not proceed with proposed Major Amendment Package H to the Brisbane City Plan to restrict townhouses and other multiple dwellings from low density areas. We write this objection with urgency and on an open basis. Our objection is based on social, economic and environmental grounds.

The grounds for our objection are, in summary, that the proposed restriction on townhouses and other forms of multiple dwellings from Brisbane's low density residential areas will:

1. Erode housing choice and diversity across the majority of Brisbane's residential land
2. Reduce housing affordability
3. Create negative social impacts
4. Further exacerbate our city's car based urban sprawl legacy
5. Pre-empt outcomes of the proposed Council Housing Strategy, which should instead be forward-focused on unlocking new housing opportunities
6. Result in inconsistency with the current Strategic Framework of the City Plan 2014
7. Result in inconsistency with the SEQ Regional Plan and
8. Result in a poor planning outcome for the community of Brisbane.

YIMBY Qld

YIMBY Qld, or Yes In My Backyard Queensland, is a not-for-profit organisation tasked with 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 want to ensure planning policy allows and encourages good development outcomes that are affordable and sustainable for current and future generations. Importantly, we believe more should be done to improve housing choices for all, so that Brisbane can be a city for everyone who wants to call Brisbane home.

Submission Grounds, Facts and Circumstances

1. Eroding housing choice and diversity

Not everyone wants a house. In a diverse and multi-cultural society, how could everyone's 'Great Australian Dream' be the same. Some people want more choice than a high rise or house. The proposed amendment to stop townhouses in our low density suburbs will erode housing choice and diversity, specifically missing middle housing forms. It will remove the last alternative housing form to the single family dwelling in our low density residential neighbourhoods, that is approximately 70% of Brisbane's residential neighbourhoods.

There are many benefits to having low density multiple dwellings as an alternative and usually more affordable housing form in Brisbane's low density suburbs. There are benefits to downsizers looking for an alternative lower maintenance housing product in the neighbourhood they call home, in the years between becoming empty-nesters and / or retiring and moving to aged care. There are also benefits to our children (the millennials) hoping to be able to afford to rent or buy a home in the neighbourhood they've grown up in.

Instead of banning this important housing type, we want to see increased housing choices made available to meet all stages of the life cycle, all income brackets and a diverse range of needs and preferences.

2. Reduce housing affordability in our City

Townhouses are on average lower cost than a single family dwelling of a similar age in the same neighbourhood. Taking out this housing option will disadvantage first home buyers, lower income households and key workers who want to reduce their commute.

According to John Daley, CEO Grattan Institute, housing is becoming out of reach for the young and poor in Australia and so the important lesson for Brisbane right now is that boosting housing in our middle suburbs is the single most important and effective government policy option we have. This proposed amendment to stop townhouses in our low density suburbs will erode housing affordability in our city.

3. Create negative social impacts

The World Economic Forum warns that inequality is one of the greatest challenges facing the future of cities. Restricting comparatively more affordable housing options across up to 70% of Brisbane will make it more difficult for millennials, first home buyers and key workers to find a home they can afford in the neighbourhood close to their family or workplace.

Furthermore, loneliness is recognised now as one of the major causes of death in the elderly yet many people do not want to move straight from their single family home to a nursing home or retirement village, they want to downsize in their own neighbourhood typically by moving to a townhouse or apartment. If that becomes impossible in the majority of Brisbane's residential neighbourhood, this raises an important planning issue and a significant social risk to Brisbane.

Our concern is that this proposed City Plan amendment will create exclusive areas all over Brisbane protected for only single family dwellings, with no housing choice or diversity. As a result, the proposed amendment will result in social exclusion across our city, in the name of protecting neighbourhood character, which appears to have become the socially acceptable way to call for segregation based on wealth. We are passionate about ensuring Brisbane is an inclusive city, ensuring housing choice and affordability is available to all who want to call Brisbane home. Policy of this nature has the dangerous potential to divide Brisbane into the 'haves' and 'have nots'.

4. Exacerbate our sprawl legacy

Brisbane is already our most sprawling mainland capital in Australia and falls well short in the sprawl rankings compared in international cities we often criticise as being low density, car-dominant, seas of sprawling suburbia. Is this Brisbane's legacy? The proposed amendment to stop townhouses in our low density suburbs will further exacerbate our city's car based urban sprawl legacy, by removing a more compact form of urban living from the available housing typologies within Brisbane's low density suburbs. This will stagnate the population of our low density suburbs and therefore maintain the very low population density of our established low density residential suburbs, reinforcing our position as Australia's most sprawling mainland capital city.

Restricted zoning in Brisbane will push more lower cost compact housing forms across the border into Logan, Moreton or Ipswich, increasing congestion on roads and the burden on infrastructure and services, increasing the cost of living for those who commute, and increasing the working day, and time away from family, with longer commutes.

It will also mean that Low Density Zoned land around major centres and transport hubs will be likely to be underutilised, when they could instead accommodate higher density development. This will result in inefficient use of strategically located sites suitable for higher density living.

5. Pre-empt outcomes of the Housing Strategy

This amendment pre-empts outcomes of the Housing Strategy, which we understand is currently underway in Brisbane. The Housing Strategy should instead be leading our housing policy and improving housing choice, diversity and affordability in our city, to ensure it is sustainable for future generations.

Instead, we need a housing strategy that actively supports compact low density housing forms such as townhouses in our large expanses of low density residential neighbourhoods, consistent with the South East Queensland Regional Plan.

We should also be learning from policy measures being adopted by progressive global cities already experiencing significant affordability issues. Responsive land use reforms are taking hold in American cities as the converging issues of climate change, housing unaffordability and pollution threaten cities and other urban areas. For example, the 2040 Minneapolis Plan will make the city the first in the US to upzone all of its single family residential neighbourhoods to allow up to three dwellings per lot. That is missing middle housing, the types of naturally affordable low to medium scale neighbourhoods prominent in many US cities built before World War II. Oregon has a plan to eradicate single family zoning in cities with 10,000 people or more. Similar efforts are occurring in Seattle, and have already been put in place in the majority of Vancouver's residential neighbourhoods.

Other US cities are looking to eliminate off-street parking requirements as they work to reclaim the enormous amount of space taken up by parked cars, and the heavy costs it adds to housing. San Francisco will soon be the largest city in the US to remove parking requirements altogether, citing both climate response reasons and to reduce housing costs.

Our Housing Strategy should be the driver of housing innovation, choice and affordability for Brisbane. The ban on townhouses should, at the very least, be put on hold until the Housing Strategy is developed and implemented.

6. Inconsistent with Strategic Framework of City Plan 2014

The proposed amendment will be inconsistent with the City Plan 2014 Strategic Framework, including section 3.4.3, Element 2.2 Brisbane's Housing and Accommodation Choices, Specific Outcome SO2 "*Brisbane's housing is diverse in type and form, offering choice to different household types and income levels and individuals with specific housing needs.*"

It is also inconsistent with the corresponding Land Use Strategy L2 "*Residential development contributes to housing diversity, particularly supporting ageing in place and assisted living and housing suited to households on different incomes, within each neighbourhood and across the city, as outlined in the applicable zone or neighbourhood plan*".

The proposed amendment will reduce housing diversity and choice for different household types and income levels and will remove opportunities to age in place within each neighbourhood and across the city.

7. Inconsistent with SEQ Regional Plan

The proposed amendment will be inconsistent with State interest matters invested in the South East Queensland Regional Plan 2017 (Shaping SEQ), a document that advances certain State interests in established planning strategies and direction, not least of which includes housing targets for all local government areas in South East Queensland and an appropriate framework to deliver a range of housing types at a range of price points to suit a range of income levels. In our opinion, consideration of the impact on housing supply needs to properly consider all types of housing and all income levels, and not simply raw numbers. The potential impact on missing middle housing forms is a specific concern.

8. Poor Planning Outcome for our City

Removing low density townhouse living from Brisbane's housing mix will, for the reasons outlined above, result in a poor planning outcome for Brisbane. While said to be in response to community feedback during the Plan Your Brisbane community consultation exercise undertaken, we not only question whether this feedback was a real reflection of broad community views and informed community views in relation to the potential consequences and trade offs, we also raise concern that the proposed amendments go further to un-wind Neighbourhood Planning outcomes which were prepared in direct consultation with their local community.

We believe townhouses are good for our City because:

- They provide housing choice for those who don't choose a house or high-rise
- They provide entry into the housing market at a lower cost on average compared to a house of a similar age in the same neighbourhood

- They give downsizers an opportunity to stay in the suburb they call home and have made social connections
- They offer lower maintenance living in comparison to owning a house, attractive for the time poor amongst us
- They are a more affordable living option for first home owners, lower income earners and key workers who want to reduce their long commute
- They offer a small backyard plus shared access to green spaces and other common facilities is great for getting to know your neighbours
- Internal low-speed private roads are safer for children to play
- More compact urban living in low density neighbourhoods makes better use of existing infrastructure
- When designed well, they add character to the neighbourhood and
- Townhouses in low density areas protects more central and accessible locations for higher density living.

Once lost, it will take significant effort to reintroduce housing choice, diversity and affordability to our city.

Conclusion

The proposed ban on townhouse living in low density areas of Brisbane will make living in Brisbane more expensive and potentially out of reach for many families, further eroding housing choice and affordability in our residential suburbs. It will also fuel social exclusion and urban sprawl.

We urge you to discontinue this proposed amendment, or at the very least shelve it until a comprehensive and consultative housing strategy is adopted that provides innovative, sustainable and affordable housing choices now and into the future.

Please do not hesitate to contact me should you have any queries or wish to discuss any of these matters further.

Yours sincerely,



Natalie Rayment

Co-founder and Chief Executive Officer

YIMBY Qld

CC

The Honourable Cameron Dick

Minister for State Development, Manufacturing, Infrastructure and Planning

Via email: statedevelopment@ministerial.qld.gov.au