



sustainability

innovation

community dividend

design excellence

Our ref: 16-004

12 April 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 E to City Plan 2014

Introduction

I refer to the draft Major Amendments Package E to the Brisbane City Plan currently on public notification and make the following submission. Thank you for the opportunity to provide feedback on the draft amendments.

This submission relates specifically to the proposed significant change to housing policy in our outer suburban areas, zoned Emerging Community. It also relates to the new provisions for car sharing. Comment is also made in relation to the drafting style adopted, citing the Subdivision Code as an example.

We support your efforts to engage with the community regarding the Emerging community housing policy and inclusion of car sharing as a car parking option within Brisbane. However, we raise concerns about the policy intentions and implementation measures associated with these important aspects of the amendment package.

We believe more can be done to continue to improve housing options for all and to offer innovative and sustainable options as an alternative available to private car ownership. We also strongly believe the drafting style of the planning scheme amendments is important and sets the tone and culture under which the scheme amendments will be interpreted and applied.

YIMBY Qld

As you may be aware, 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 want to ensure planning policy allows and encourages good development outcome.

Proposed Amendments to the Emerging Community Zone

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. We are therefore very concerned that the changes proposed to the Emerging Community Zone will effectively change the zone to a future Low Density Residential Zone, restricting the ability to deliver compact, walkable neighbourhoods in well located areas across the city and instead encouraging sprawling suburbs of only single family dwellings until the Brisbane City Council area limits.

Specifically, we raise concern in relation to the imposition of dwelling densities of 18 dwellings / hectare as an overall outcome, other than for a very limited selection of sites. This will significantly reduce the available housing options in our Emerging community areas, effectively removing housing choices such as terraces and row houses, apartments and other missing middle housing forms from the significant majority of Emerging community zoned land across Brisbane.

We instead want to see increased housing choices to meet all stages of the life cycle, all income brackets and a diverse range of needs and preferences.

Proposed Amendments to Incorporate Car Sharing

We are strong advocates of innovative and sustainable planning outcomes for Brisbane, and therefore support your recognition and inclusion of car sharing services within the Transport, Access, Parking and Services Code. We strongly believe there is a great opportunity to encourage behaviour change regarding reliance on private vehicles, through this policy. However, we are concerned that the proposed definition is too narrow and the allocation rate to car parking requirements is insufficient to be effectively implemented or to incentivise this important concept.

The definition proposed for car sharing appears to restrict external operators from providing this service, instead requiring the service to be operated by the Body Corporate and included on common property. It would be a positive move forward to allow external operators to provide this service and lease or own the space.

Furthermore, it is disappointing that car sharing spaces will only account for one of the minimum spaces required for development. By their nature, these services are shared services, and so ought to account for more than one standard private space. We would prefer to see the planning policy encourage, support and incentivise car sharing, by recognising that they are the equivalent of more than one standard bay.

Drafting Style

We raise concern with the drafting style adopted in parts of the amendment package, citing the Subdivision Code amendments as an example. Starting the new purpose statement with a negative (i.e. of what we don't want), will set the tone for how the Code is interpreted and applied. It is a first for Brisbane, to start a purpose statement with a negative, and is a disappointing approach. Perhaps this was unintentional. We would prefer to see the regulation clearly articulate the vision for the outcomes sought to be created through subdivision development. This can be supported of course by clear articulation of what is not appropriate or intended.

Conclusion

Congratulations on releasing the Draft amendments for consultation. We hope you will fully consider our comments and recommendations. We look forward to seeing some of the exciting features of the amendments being brought to life and the liveability improvements they could 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,



Natalie Rayment
Co-founder
YIMBY Qld