



sustainability

innovation

community dividend

design excellence

Our ref: 16-004

25 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](mailto:Strategic.Planning@brisbane.qld.gov.au)

Dear Sir / Madam,

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

## Introduction

YIMBY Qld requests that you do not proceed with proposed Major Amendment Package J to the Brisbane City Plan to increase car parking requirements for multiple dwellings outside the CBD fringe of Brisbane. We write this objection with urgency and on an open basis. Our objection is based on economic and environmental grounds.

The grounds for our objection are, in summary, that the proposed increase in car parking requirements will:

1. Reduce housing affordability, with every additional car parking space estimated to add at least \$30,000 to the cost of an apartment or townhouse in Brisbane
2. Result in higher parking requirements than larger Australian capital cities (Sydney and Melbourne) as well as other Queensland cities and towns in regional areas
3. Increase car parking rates when progressive global cities are decreasing car parking rates in response to concerns with housing costs and environmental consequences
4. Further exacerbate our city's car dominant legacy, which is ironic given Council is focusing on public transport improvements including the Metro project and the City has new alternative transport methods including Uber and shared scooters
5. Pre-empt outcomes of the proposed Council Housing Strategy

6. Result in a poor planning outcome for the community of Brisbane, in relation to affordability and environmental issues and also because we believe adding car parking spaces will only increase traffic and congestion in our residential neighbourhoods.

## **YIMBY Qld**

As you would be aware, 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 affordability, so that Brisbane can be a city for everyone.

## **Submission Grounds, Facts and Circumstances**

### **1. Reducing housing affordability in our City**

Increasing car parking rates will come at a cost to our city in terms of housing affordability. At an average cost of \$30,000 (above ground) to \$50,000 (basement) per additional car parking space, this amendment will add significant construction costs to multiple dwelling projects outside Brisbane's CBD fringe, pushing up the cost of housing in our suburbs.

The World Economic Forum warns that inequality is one of the greatest challenges facing the future of cities. Adding \$30,000 plus to the cost of an apartment or townhouse will make it more difficult for millennials, first home buyers and key workers to find a home they can afford in Brisbane.

### **2. Result in Higher Parking Requirements than Sydney, Melbourne & Regional Qld**

We understand the proposed changes to car parking requirements will:

- Increase car parking rates for multiple dwellings from 1.25 to 2 spaces (a 60% increase) for 2 bedroom units and 1.5 to 2 spaces (a 33% increase) for 3 bedroom units
- Increase car parking requirements for multiple dwellings from 1.5 to 2.5 spaces (a 66% increase) for 4 plus bedroom units
- Increase visitor car parking ratio for multiple dwellings from 0.15 per unit or roughly 1 per 7 units, to 0.25 per unit or 1 per 4 units and
- Remove the ratio reductions for multiple dwellings on sites outside the city core and city fringe but otherwise within 400m of a major suburban public transport node. These rates are currently 0.9 for 1 bedroom (with new rates of 1 car space per unit, this is a 10% increase), 1.1 for 2 bedrooms (at the

new rate of 2, this is an 82% increase) and 1.3 for 3 bedrooms (at the new rate of 2, this is a 54% increase) and 1.3 for 4 or more bedrooms (at the new rate of 2.5, this is a 92% increase, almost double).

We understand these proposed new rates will be higher than those in Sydney and Melbourne and many cities and towns in regional Queensland. Why now, when we have increased expenditure by the State Government on cross-river rail, Council on the Metro and other public transport and cycle way improvements, and alternative forms of transport have entered the Brisbane market, including Uber, GoGet & Lime Scooters?

### **3. Opposite to Actions of Progressive Cities**

These amendments come at a time when progressive cities around the world, including cities in what is often referred to as car dominated USA, are doing the exact opposite and removing minimum car parking requirements due to concerns about climate change, housing unaffordability and pollution.

We should instead be learning from policy measures being adopted by progressive global cities. A number of 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 is aiming to be the largest city in the US to remove parking requirements altogether, citing both climate response reasons and to reduce housing costs. The Brisbane Blueprint is doing the reverse.

### **4. Further Exacerbate our Car Dominant 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 substantially increase car parking, even when in easy walking distance of major public transport stations, will further exacerbate our city's car based planning legacy.

We need to consider what problem we are really addressing by increasing rates. If the community concern is about traffic and congestion, then we need to be careful about the real effects of this policy. Will it simply increase private car reliance? Or even free up on-street parking spaces near major transport stops, encouraging commuters from further afield to drive into these neighbourhoods, park and take a shorter public transport ride into the city?

### **5. Pre-empts 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 affordability in our city, to ensure it is sustainable for future generations.

## 6. Poor Planning Outcome for our City

For the reasons outlined above, the proposed amendment will result in a poor planning outcome for Brisbane. Once increased, it will take significant effort to undo this and reduce car parking rates across our city, in line with new global standards. Brisbane's planning and transport policies should instead be sustainable and should not adversely impact affordability.

### Conclusion

YIMBY Qld does not support these proposed car parking ratio increases, particularly in walking distance to public transport stations. We are passionate about ensuring Brisbane is an inclusive and affordable city, available to all who want to call Brisbane home. We therefore request that the proposed amendment be discontinued.

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](mailto:statedevelopment@ministerial.qld.gov.au)