

Sunday, 16 June 2024

Neighbourhood Planning
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To whom it may concern

The draft Nathan, Salisbury, Moorooka Neighbourhood Plan

We are writing to you today regarding the draft Nathan, Salisbury, Moorooka Neighbourhood Plan. Thank you for the option to submit feedback on this draft.

Greater Brisbane is a fully volunteer grassroots collective of people who felt locked out of conversations about our city.

We want a Brisbane where everyone is welcome and has the opportunity to live a good life wherever they want. We believe housing abundance — **building more homes where people want to live** — is the key to solving the housing crisis and building the kind of cities people love.

As long as people want to live in our city, we need to make sure we have enough modern, affordable homes for all of them.

To do this we need to build abundant housing of all types and tenures where people want to live — public, private and commons, townhouses to skyscrapers.

Many of our members live and work in the subject area of the plan, others would like the opportunity. Many are younger renters, first home buyers or simply individuals frustrated that the future of Brisbane's neighbourhoods are being dictated by reactive policies that only serve to appease a vocal few, at the cost of dynamic and thriving communities.

We believe the proposed planning changes do not go far enough to facilitate housing development and mixed uses — the total footprint of this neighbourhood plan has existing amenity with great access to employment, schools, hospitals, retail and the public transport network.

As it stands, this draft repeats the problems that have plagued previous neighbourhood plan reviews across Brisbane.

The developable area is narrow in scale, lacking ambition and will only further exacerbate the slow pace of desperately needed infill.

This “path of least resistance” approach is damaging to the long-term viability of our city, as the climate gets hotter, housing gets more unaffordable and people’s everyday travel stretches their limited time across more distant locations.

This drag on people’s quality of life is a direct result of fragmented zoning.

Restricting development to a handful of large, expensive sites on main corridors or where industry is vacating creates an anti-competitive environment for development, privileging large existing developers over more innovative, smaller entrants.

According to Brisbane’s Vision 2031, every suburb is meant to have a diversity of housing options that actively facilitate people using public and active transport for the majority of their trips.

This draft plan fails at this basic hurdle to facilitate that. It fails by Council’s own metric.

It is impossible to see how Brisbane City Council can achieve its housing targets and its own vision for the future of our city while continuing to rely on the lowest common denominator approach to planning.

And if this approach continues, the outcome will almost certainly be the Queensland Government asserting more direct influence over planning — as both the Victorian and NSW Governments have been aggressively pursuing in recent years.

Given the scale of ambition the Queensland Government, especially Economic Development Queensland, are pursuing in their own housing projects, Council’s own planning should meet those ambitions.

Failing to do so invites Moorooka and Rocklea becoming a priority development area in the near future to get it done.

Council can change this right now with one simple change.

By rejecting this careful rationing of developable lots in this neighbourhood plan with a much more ambitious blanket upzoning, Council could declare itself to be on the side of housing affordability, a more competitive building market and a better, future-oriented city.

That's why Greater Brisbane supports broad upzoning.

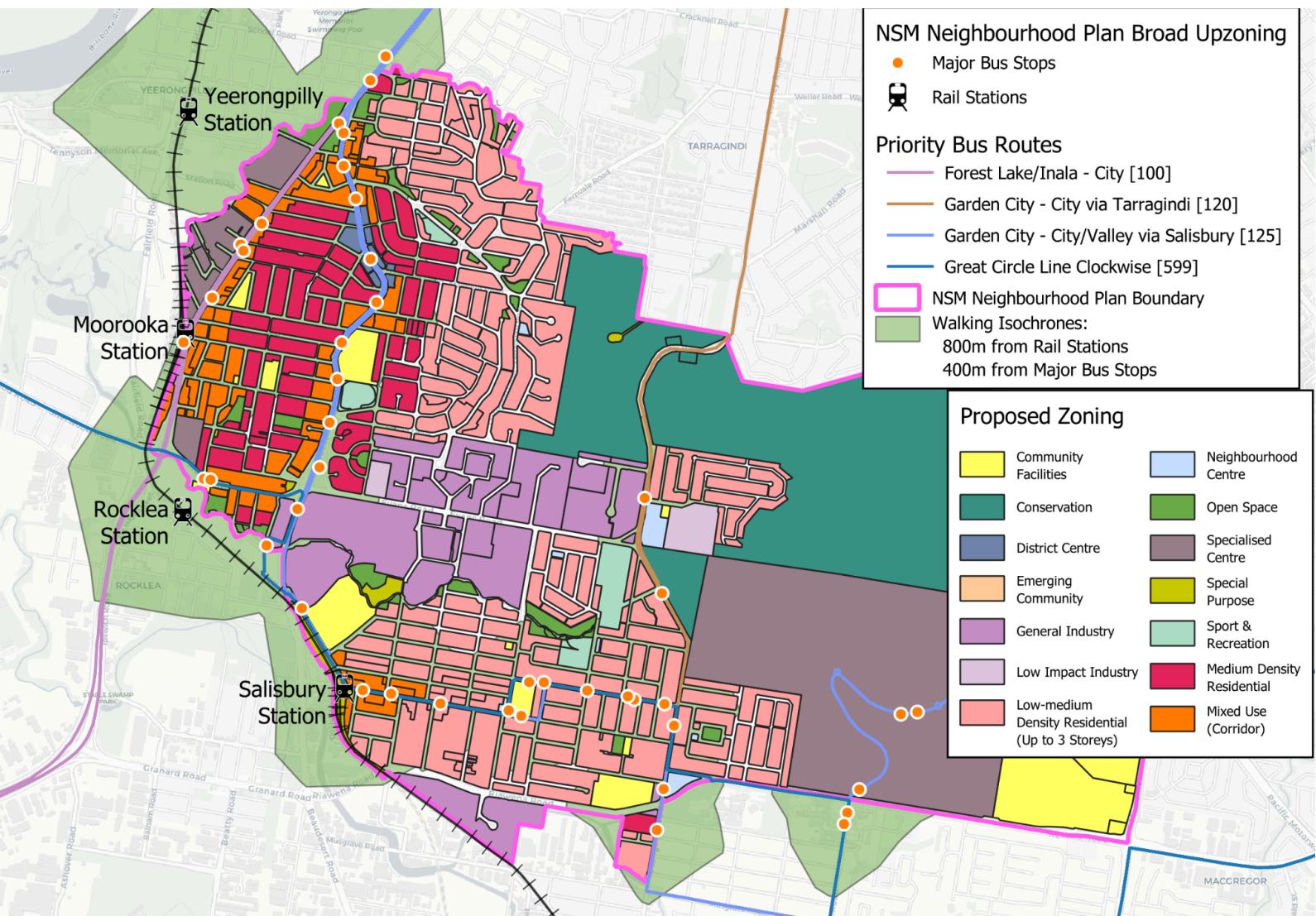
We want everywhere across this neighbourhood plan to have the opportunity to build and for streets to densify at the natural pace of renewal.

We want to give homeowners back the right to develop their suburban blocks into more townhouses and flats people can live in.

Critically, we believe everywhere within a short walk of Yeerongpilly, Moorooka, Rocklea and Salisbury train stations (including the bus stops along Ipswich Road) should at minimum be zoned for mixed use (corridor) or medium density residential.

This map below shows our alternative plan for Moorooka, Salisbury and Nathan in its surrounding context. We discuss our alternative plan in detail below.

We believe that this neighbourhood plan did not put enough emphasis on critical points of interest outside the boundaries' borders — notably Yeerongpilly and Rocklea Train Stations, Rocklea Markets and the generous green space at Yeronga Memorial Park, Oxley Creek Common and Stable Swamp Creek.



We also encourage Council to move the locus of development both off flood-prone post-industrial land which demands significant engineering to accommodate Brisbane's regular flood events, and off main roads towards "second streets", where there's less pollution, noise and potential dangers to pedestrians.

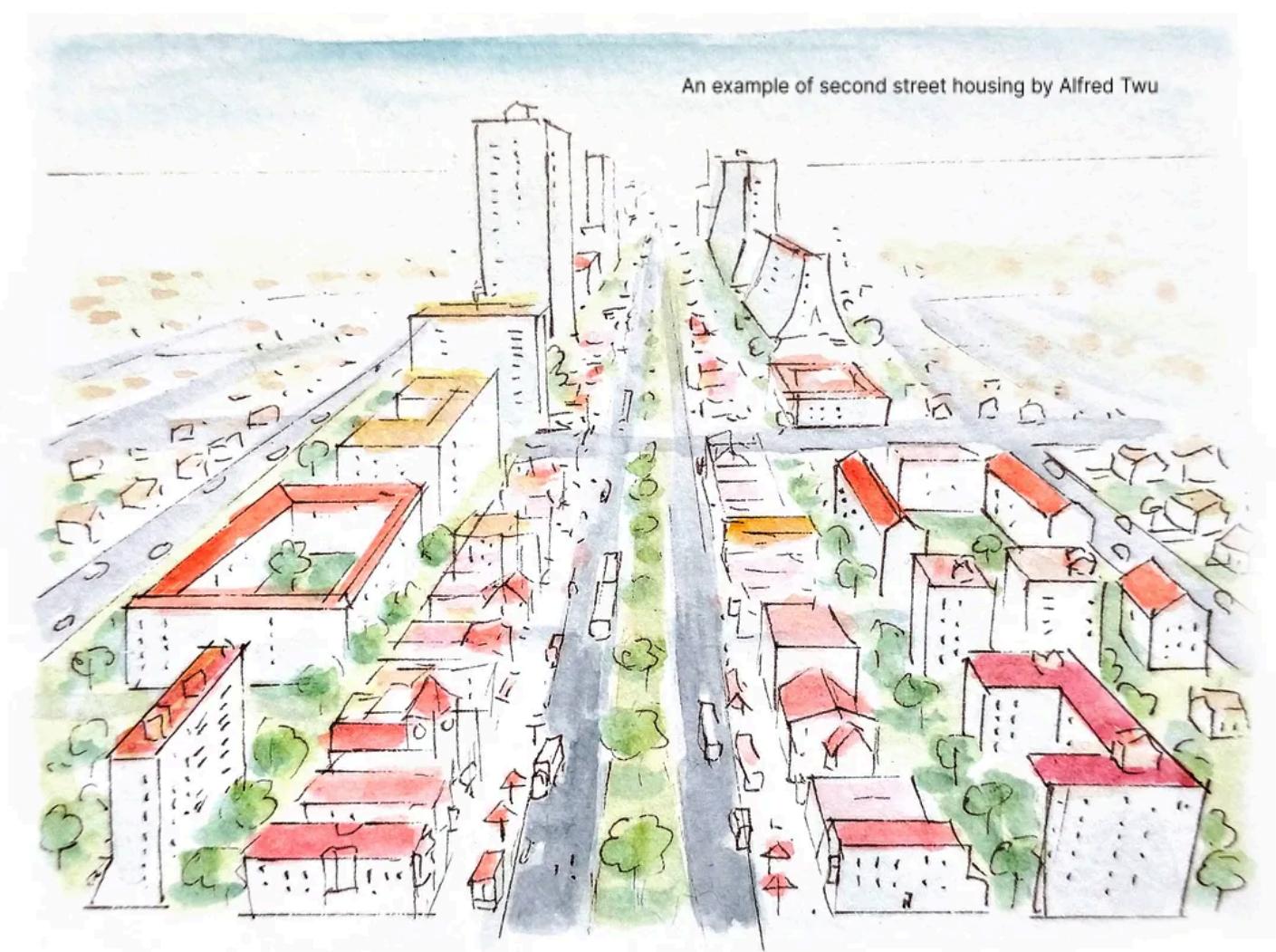
Second street housing is a way to start unpicking the unpopular compromises that comes with focusing development on main roads.

This should not mean less development on main roads — but towards a balance between main road development which might lean more commercial and "second street" development which should lean more residential.

Second street housing is also a more intuitive way for people to understand their neighbourhood. It rejects the fear of density as a cause of noise and congestion and replaces it with a more accurate appreciation for quiet enjoyment and walkability, things existing residents in suburban streets value.

While this principle is not immediately applicable to the Magic Mile's industrial and car-oriented flavour, this is a useful tool for understanding Muriel Avenue and Beaudesert Road — as well as helping guide what a post-industrial future for Ipswich Road might look like.

An example of second street housing by Alfred Twu



General comments

Brisbane needs more homes. Our housing crisis has become so acute that we can no longer afford to tinker at the edges of planning reform. Neighbourhoods like this with good public transport connections, access to jobs and proximity to our city's centre need to have planning policies that reflect the 'New World City' we want to become.

We can not continue prescribing a narrow range of built forms across the majority of the city, reserving development to a small number of (rapidly depleting) locations.

While this manifests most egregiously in exclusionary character restrictions and the ban on townhouses and duplexes in arbitrarily defined low-density residential neighbourhoods, even the way we permit development is problematic.

Our "spot" approach to development — constraining most increased density to selected post-industrial precincts, many being flood prone — denies the vast majority of our city the benefits of walkable neighbourhoods. It reinforces an uneven urban fabric where high and low density neighbourhoods collide with no buffer in between.

By limiting capacity through zoning we've slowed housing growth, encouraged speculation and prevented diverse housing options from entering the market.

It incorrectly assumes that every potential lot will or should be built to its maximum capacity, when in reality this rarely happens (where it does, it takes a long time). Limiting land supply through narrow zoning footprints reinforces speculation and that scarcity further inflates prices. This creates a vicious cycle where the cost of land is driven up, making it harder for developers to build, and for people to find homes.

A better approach to planning is to reject careful rationing of developable land, which limits developability to a handful of players, in favour of broad upzoning that encourages market competition — as inspired by the success of Auckland's reforms.

That's why Greater Brisbane advocates for the abolition of *Low-Density Residential* and *Character Residential* zones entirely in favour of blanket *Low-Medium Density Residential* zones — and the broad upzoning of everywhere within a short walk of a public transport hub, commercial or employment hub or local shops to, at minimum, *Mixed Use (Corridor)* or *Medium Density Residential* zones.

Our submission on this plan is guided by this core principle. Ambitious plans are very welcome but cannot be a replacement for a new floor fit for the 21st century.

Every neighbourhood in our city is owed the possibility of modern, climate resilient homes with their daily needs accessible without a private vehicle.

This should not and cannot be a luxury for a few — and renewal potential cannot be limited to the inner city.

An amenity rich and attractive neighbourhood plan

The Nathan, Salisbury and Moorooka Neighbourhood Plan must be considered in the context of how people live their lives — something that rarely aligns neatly with boundaries on a map.

As such, our alternative plan is more accurately described as an inner south-west transit oriented development plan.

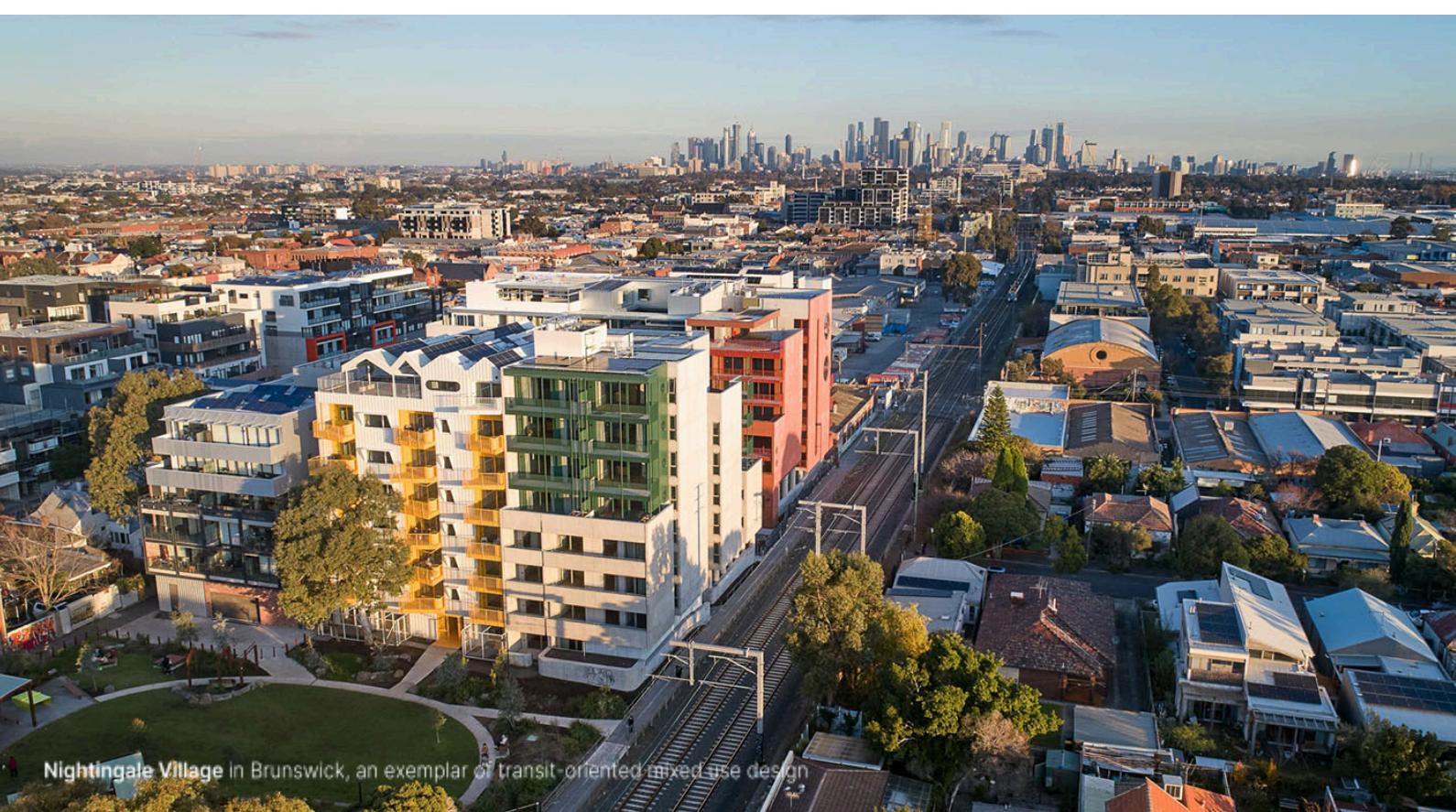
We're focused on how future residents will live their lives, walking or riding a bike, bus, or train to the shops, to their work or participating elsewhere in the community or city.

We aim to create a public realm that encourages and welcomes people to walk or bike to cafes, bars, the library, pool or local school.

We are prioritising interconnectedness. We want to ensure that people can seamlessly walk or ride to their train station, park or local shops without having to face the dangers of busy main roads or unsafe industrial precincts.

This neighbourhood plan — especially the *Magic Mile precinct* and its *sub-precincts* — has an opportunity to be an exemplar of denser mixed use, surrounded by gentler density and pedestrian friendly living in the subtropics.

But it takes some ambition, and importantly a willingness to let go of nostalgia and embrace a people focused future Brisbane.



Nightingale Village in Brunswick, an exemplar of transit-oriented mixed use design

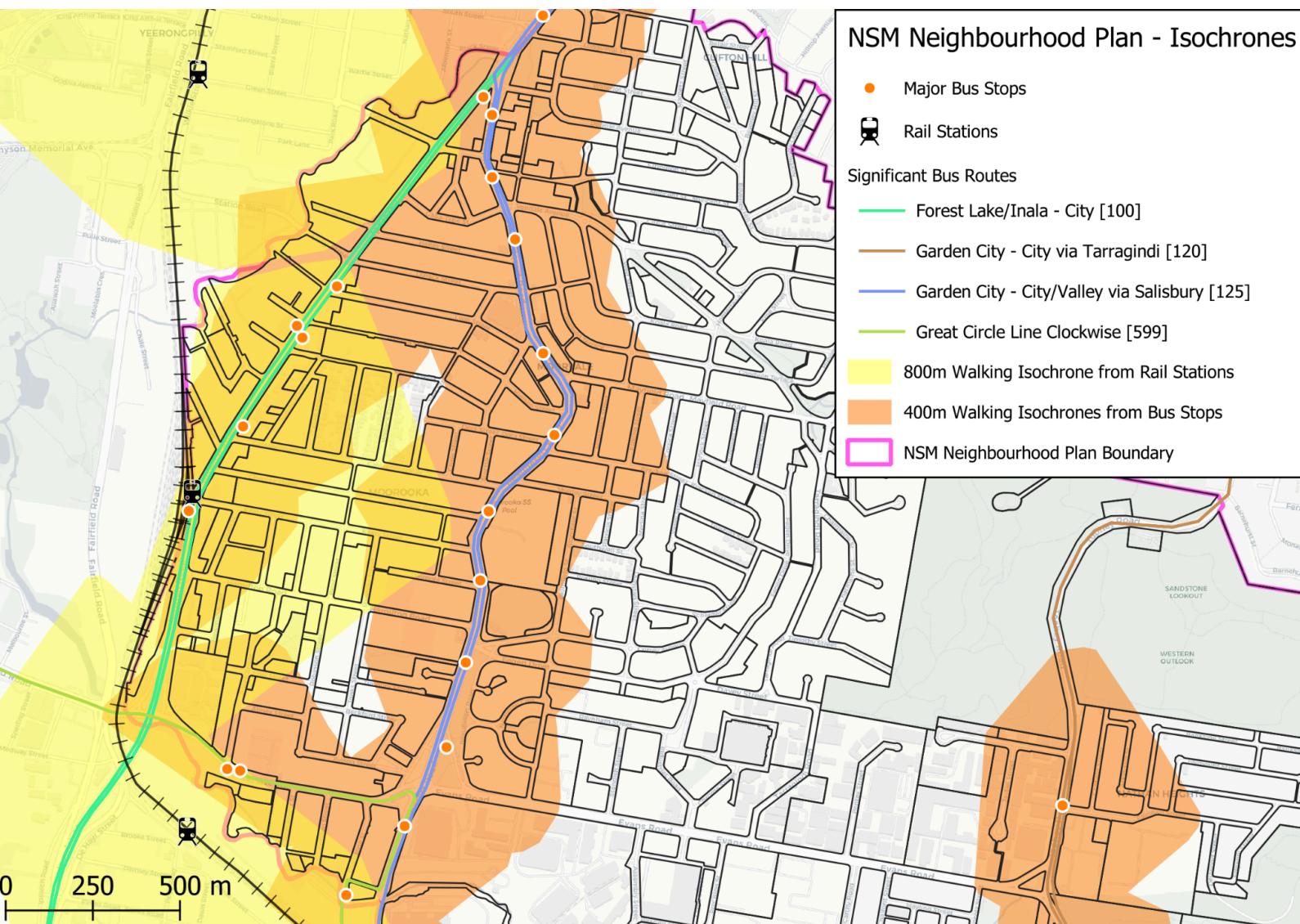
As such, our alternative plan focuses on neighbourhoods surrounding the Yeerongpilly, Moorooka, Rocklea and Salisbury train stations — and to a lesser extent, those within a short walk of stops for Routes 100, 120, 125 and 599.

As you can see from our map below, only a very small part of Moorooka — around Beckford Street — doesn't fall within a walkable neighbourhood of either a train station or frequent bus stop. In fact, a fairly straightforward improvement to pedestrian access across Rocky Water Holes Creek would mean frequent public transport would be accessible to everyone in Moorooka in a short 20 minute walk.

This makes the precinct ideal for ambitious transit oriented development.

We would rather see residential purposes included in more of the employment sites — notably that properties that cease industrial uses within the *Employment core sub-precinct* should be subject to the same mixed use residential transition as the *Gow Street renewal sub-precinct*.

This is especially important along Lucy Street which is an important pedestrian connection to Yeerongpilly Train Station.



We are concerned that there are no areas zoned for Community Purposes near Ipswich Road.

Strong investment in public infrastructure around new developments — particularly where that investment is foreshadowed in early visions like this neighbourhood plan — is a critical step in building social licence for greater density. The benefits of compact living and having all your needs within a short walk may not be immediately evident to a stressed family already worried about overcrowding at local schools or congestion on their streets. Including these investments, even as uncosted “ambitions” in plans, demonstrates to the public that Council are listening to their concerns and are prepared to make the investments necessary to balance growth with improving conditions for existing and future residents.

That's why we believe that Brisbane City Council should take this opportunity to give this new community a modern and future-proofed library and community centre — particularly given the expected population growth near the train station. There are also no new pocket parks or playgrounds adjacent to the growth corridor.

While we are not committed to a specific site for this, we believe that both western side of Gainsborough Street and along Mackie Street are strong possibilities for creating community hubs with parks or a library. We intend for our alternative plan below to use these as indicative possibilities rather than requests on our behalf.

On the other hand, land adjacent to Len Stimson Park, Moorooka Lions Park and Veterans Park are underutilised. We'd welcome ambition to densify these surrounds, to activate the park frontages with more commercial and community uses.

Bargoonga Nganjin in Fitzroy, a modern multi-use suburban library



Our alternative proposal re-envisioned the entirety of the precinct bounded by the train line and Beaudesert Road.

Our plan rejects the approach of carefully rationing out zoned capacity in favour of a mass uplift.

This approach won't see the whole suburb suddenly become as dense as Teneriffe overnight, but empowers property owners to consolidate, encourages land assembly and enables smaller, more innovative developers to enter Brisbane's very uncompetitive building market.

The main departure from the proposed changes is the considerable expansion of *Mixed Use (Corridor)* along the entirety of the Ipswich Road and Beaudesert Road corridors, as well as select "second street" precincts around Lucy Street, Mackie Street and Holmes Street.

We're also proposing that the remaining residential zoned sites in this area be rezoned as *Medium Density Residential* and have any existing traditional character protections removed.

As Brisbane's Vision 2031 says, each suburb should have a diversity of housing choices to accommodate lifestyle changes. As it stands, there is little in this draft that would facilitate the kind of gentle density that would empower local residents to downsize and age in place.

Council's addition of arcades on Amery Street is admirable and we would like to see this kind of low-impact cross-blocks links in all streets to encourage permeability.

We also want to encourage Council to consider whether laneways or linear parks could sit behind the Ipswich Road mixed use precincts, creating pedestrian and active transport connections between Moorooka Station and new community and mixed use precincts as they develop.

In the long term, we'd like to see the pedestrianisation of connecting streets designated Primary Walking Routes like, for example, Keats or Gainsborough Streets connecting to Moorooka State School.

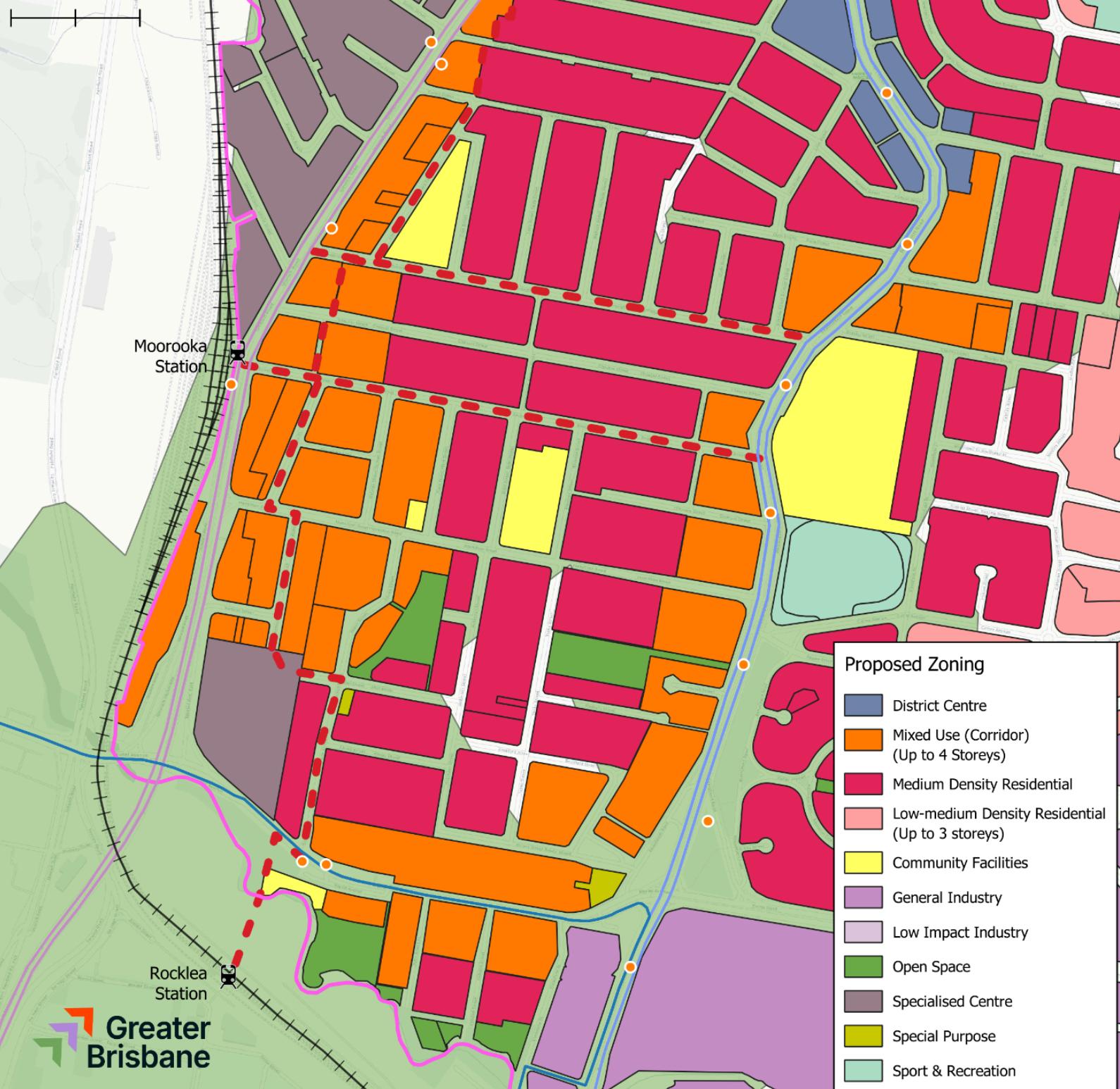
Our alternative plan for Moorooka follows on the next page. This comprehensive reimagining is a significant departure from the draft Neighbourhood Plan and reflects the community's appetite for more ambitious planning for infill.

While our focus has been on Moorooka, these principles would equally apply to areas around the Salisbury train station or anywhere with high frequency public transport.

Nathan-Salisbury-Moorooka Neighbourhood Plan Proposed Broad Upzoning

- Rail Stations
- Major Bus Stops
- Priority Bus Routes**
 - Forest Lake/Inala - City [100]
 - Garden City - City via Tarragindi [120]
 - Garden City - City/Valley via Salisbury [125]
 - Great Circle Line Clockwise [599]
- Walking Isochrones:
 - 800m from Rail Station
 - 400m from Major Bus Stops
- NSM Neighbourhood Plan Boundary
- Proposed Primary Walking Routes

0 100 200 m



Other comments

Parking

Greater Brisbane wants a future where our streets are for people, not cars.

The reduced parking minimums for the south end of the Magic Mile precinct are a positive step — but in our view, they are not ambitious enough and don't reflect the transport options available to residents.

The parking mandate changes should also be expanded across the entire Magic Mile precinct and anywhere within a short walk of a train station.

When new major plans like this are released, we should not only take the opportunity to open streets for the community but also restrict or diminish motor vehicle access. This could potentially be achieved by converting neighbourhoods to one-way superblocks and taking lanes away from on-street parking or passing traffic.

We support implementing parking maximums within these areas of — for example — one residential car park and 0.5 visitor car parks per unit regardless of the number of bedrooms.

We also support moves to encourage active transport parking, end-of-ride and maintenance facilities. Council could facilitate this by installing first-class facilities at libraries and community facilities and working with the state government to ensure train stations are equipped with adequate cycling infrastructure.

The cost of active transport infrastructure is negligible when compared to the cost of car parking, both in construction and as an end cost to the consumer.



Comparatively little attention given to Salisbury and Rocklea

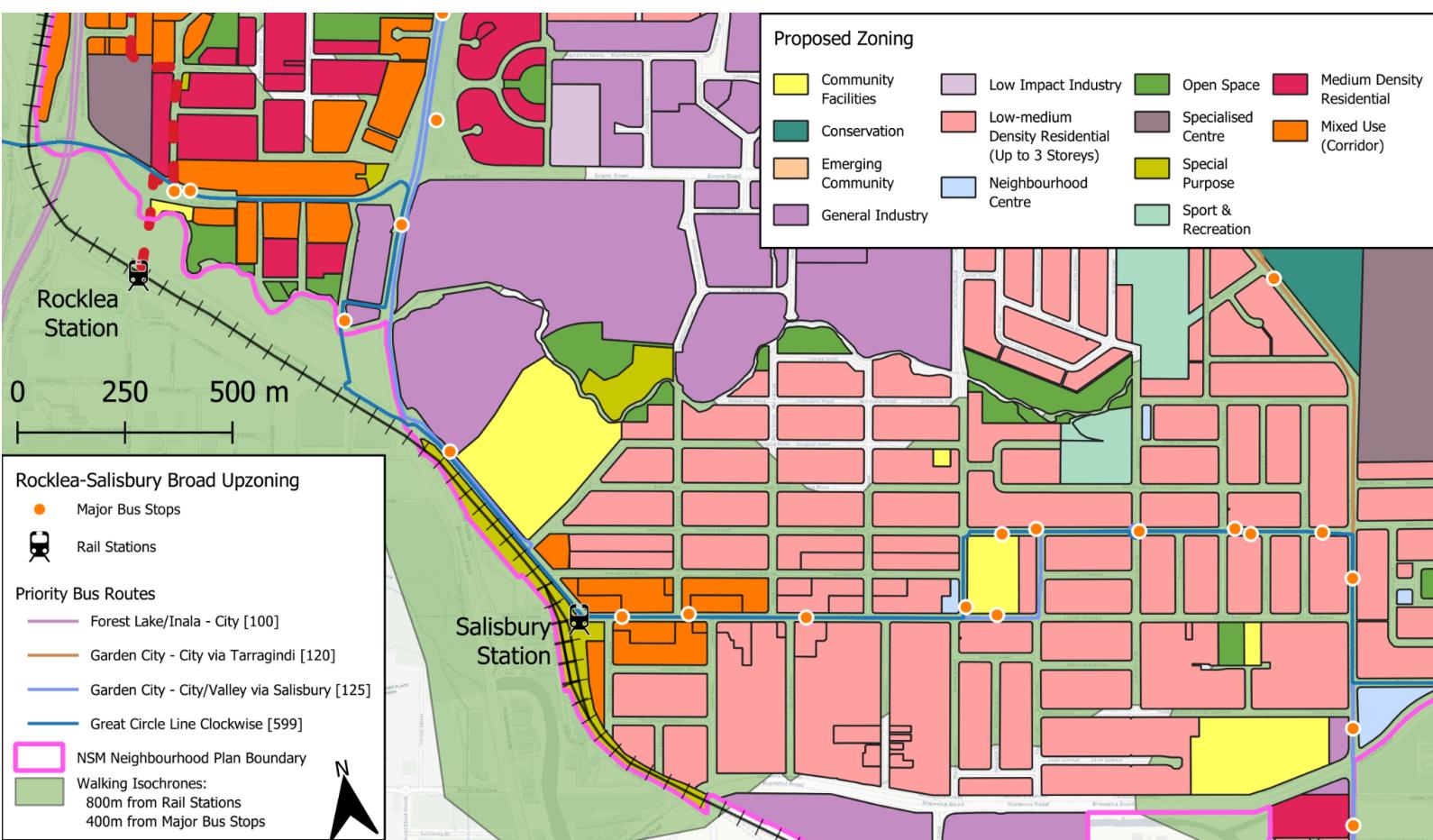
We note that there is very little change to the majority of Salisbury and the southern end of Moorooka.

We would like to see, at minimum, the properties with a proposed zone change near Salisbury Train Station to be made *Mixed Use (Corridor)* and all blocks abutting Lilian Avenue be zoned *Low Medium Density Residential*. This street is well serviced by buses and the proximity to the train station and Brisbane Christian College would support some commercial uses.

We also strongly endorse the community vision for Rocky Water Holes Creek around Rocklea Train Station alongside applying the same upzoning principles to properties around Muriel Avenue. Improving pedestrian and cycling connectivity to Rocklea Train Station — and by extension, Oxley Creek Common and the Rocklea Markets — are key parts of making Moorooka a truly walkable neighbourhood.

There's a strong case for creating a contiguous mixed use precinct between Moorooka and Rocklea Train Stations and facilitating permeability between the two and the streets bounded by them.

This is our alternative plan for Rocklea and Salisbury Train Stations as examples of what extending the ambition from the Magic Mile down along the train line might look like.



Character restrictions and the War Workers Housing Estate

We oppose unjust, unnecessary and exclusionary restrictions like Council's proposed expansion of character protections that merely seek to privilege existing homeowners.

In fact, we strongly believe that the existing Traditional Building Character overlaid properties within those transport catchments above should be removed to encourage gentle densification.

Recent research clearly shows that even parts of Brisbane targeted for densification through infill development, character house retention requirements and minimum lot sizes completely preclude housing diversity.

The War Workers Housing Estate heritage listing in particular is offensive. It's a cruel irony that a progressive homebuilding programme from our past is being used to justify stopping any housing renewal in perpetuity.

Rather than pay lip service to what these homes represent and locking future generations out as a result, we should resurrect the spirit of the policy with our own 21st century mass public building campaign.

If Council isn't prepared to invest in a building programme themselves, they should at least get out of the way and let an open market do so.

An example of the War Workers Housing Estate



Thank you once again for this opportunity to contribute to this draft Neighbourhood Plan and the future of our city.

We hope that this Neighbourhood Plan is the first in a new trajectory for Brisbane.

One that distributes our city's growth throughout our suburbs and helps people stay embedded in their local communities as they age, start families and eventually downsize.

One that supports a more competitive and diverse building industry and incentivises innovative approaches to compact living, rather than making it impossible for new players wanting gentle density to even get a look in.

One that puts people — not cars — first.

We're always keen to work with Council and fellow travellers on ensuring that we're planning for the future with housing, transport and infrastructure.

As always, reach out if you would like any clarification or with any questions — or if you'd just like to have a yarn about the city we all love.

Yours sincerely

Robert Lucas and **Kurt Labuschewski** | Greater Brisbane spokespeople

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