

11 March 2022

Mr. Darren Scott
Chief Executive Officer
Logan City Council
PO Box 3226
Logan City DC QLD 4114

By email: strategicplanning@logan.qld.gov.au

Dear Mr Scott,

Major Planning Scheme Amendment 2021

Thank you for the opportunity to provide feedback on the proposed Major Planning Scheme Amendment 2021.

The Property Council of Australia is the leading advocate for Australia's biggest industry – property. We are a national not-for-profit organisation established to promote the work of the property industry in delivering prosperity, jobs, and strong communities to all Australians. Here in Queensland, the Property Council represents over 380 member companies across residential, commercial, retail, retirement living, industrial, tourism and education sectors.

As a general principle, the Property Council supports the ongoing and timely review of planning documents to reflect current trends and future development demands. As such, Council's review of the planning scheme is welcome and supported.

This submission provides comment on the proposed amendments on behalf of our members who will be responsible for delivering housing product within Logan City Council.

Housing and Lot Diversity Amendment

The Property Council supports the intention of the housing and lot diversity amendment which is to better preserve the character of the city's urban residential areas and facilitate greater diversity of housing choice.

Our members are concerned however by the proposal to replace minimum average lot sizes with a minimum individual lot size, the smallest of which would be 300m² in Small Lot precincts.

This amendment would stop the selective incorporation of terrace style or other more affordable dwelling types into developments in these precincts, thereby constraining housing diversity and affordability whilst greatly reducing the supply of new dwellings to the market.

This would also cause a widening of the gap between the South East Queensland Regional Plan's density objective for growth areas and Council's requirements outside those areas. Should this happen, development outside of EDQ's Priority Development Areas would be further disadvantaged.

We are further concerned by the proposed increase in minimum lot sizes in Suburban Precincts from 350m² to 400m². This change removes the opportunity to incorporate appropriately designed and located smaller lots, whilst also further diluting housing choice, diversity, and affordability.

Logan City is one of the largest contributors in South East Queensland of affordable housing and is a major source of new dwellings for the region. As such, we are extremely concerned that any amendment that would impact the delivery of affordable housing would have significant impacts across the region and may result in Logan City Council struggling to meet its growth obligations under the South East Queensland Regional Plan, further adding to the housing availability and affordability crisis.

Change to Frontage Requirements

The Property Council notes that changes are also proposed to frontage requirements to achieve greater diversity through a better mix of lot sizes and widths. Specifically, it is proposed to reduce minimum lot frontage from 15m to 12.5m in Suburban Precincts and from 18m to 15.5m in Village Precincts.

Whilst the intent of the proposed changes is supported, along with the move to reduce some frontages, it is recommended that further reduction is needed.

Specifically, it is recommended that the minimum frontage in Village Precincts is further reduced to around 14.5m. This is considered a better reflection of current market trends for such areas and would further improve housing choice by providing a frontage that is suitable for a broader range of dwelling types.

Dual Occupancy

The planning scheme currently offers a density concession for dual occupancies on corner lots and lots with dual frontages.

This density concession is proposed to be removed in the current planning scheme amendment. The Property Council is concerned that the removal of these existing concessions would further impact on housing diversity, affordability, and supply.

Additional Matters for Consideration

Through consultation with our members, additional matters were identified that we encourage Council to consider for inclusion in the current amendment or as part of future planning scheme amendments.

Development approval requirements for Logan City Council's Emerging Community Zones.

The planning scheme currently requires the proponent to override the planning scheme via a Material Change of Use (MCU) approval to allow the subdivision to occur, in addition to seeking approval for the Reconfiguration of a Lot (RAL).

Given the purpose of Emerging Community Zones is to protect land for future urban development, it seems illogical to require proponents to secure the MCU approval in addition to the RAL approval for urban developments in these zones.

Application Fees

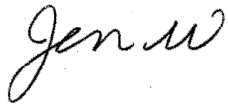
As an associated issue, the resultant default Council application fees, when applied on a per lot basis, is high and necessitates an applicant request to vary the fee. In most circumstances to date, Council has generally agreed to vary the fee and the varied fee is usually considered reasonable by the industry.

The opportunity for a review of the above application fees and the process currently applied would be warmly welcomed by our members.

Thank you for the opportunity to provide feedback on the review of the proposed amendments.

We welcome the opportunity to discuss any aspect of this submission with Logan City Council in more detail. If you have any questions in relation to the Property Council or this submission, please do not hesitate to contact me on jwilliams@propertycouncil.com.au or 0448 432 936.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jen W', written in a cursive style.

Jen Williams
Queensland Executive Director