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Draft Ipswich Plan 2024

The Property Council of Australia welcomes the opportunity to provide input into the draft Ipswich Plan 2024.

The Property Council is the leading advocate for Australia's property industry with over 400 member companies here in Queensland. Our members represent a cross-section of the property sector and are spread across all asset classes – they are city-shapers and community builders, who are committed to delivering projects that embrace local characteristics and benefit Queenslanders for the long-term.

Our members invest in, design, build and manage places that matter to Australians. They have a long-term interest in the future of our places and spaces and are committed to creating great cities, strong economies, and sustainable communities.

As the fastest growing local government area in Queensland, Ipswich will play an essential role in responding to the State's housing crisis. As such, this scheme represents a key opportunity for both Ipswich and South-East Queensland and it is imperative to ensure this scheme gets the balance right in providing the development industry with certainty and confidence to build critical supply.

In addition to helping house South-East Queensland's rapidly growing population, Ipswich has a high level of land suitable for industrial uses in comparison with other local government areas. Industrial land is not only crucial in terms of its value as an employment driver but due to its ability to help facilitate development outcomes for all industries including the residential sector. With a comparative lack of adequate and serviceable industrial land in neighbouring LGAs there is an opportunity for Ipswich to continue to unlock industrial land in order to help the City's economy to continue to mature and to enable the production of materials essential in fuelling Queensland's housing and infrastructure pipeline.

As such, the Property Council's feedback on the draft Ipswich Plan 2024 relates firstly to the residential provisions within the plan followed the provisions that will impact industrial development.

Residential provisions

Housing diversity

Ipswich is growing rapidly and evolving in terms of demographics and Council deserves credit for harnessing this growth and consistently outperforming neighbouring LGA's in terms of lot approvals and multiple dwellings approvals.

Furthermore, the recent announcement by Council that it would be waiving DA fees to incentivise certain multiple dwellings in medium and high-density residential zones highlight Ipswich City Council's recognition that we need to build our way out of the current housing crisis by facilitating housing supply and diversity across all typologies.

The draft Ipswich Plan 2024 builds upon this with the welcome acknowledgment that multiple dwellings may be established in the low-density residential zone when they are compatible with the scale, character, and amenity of the area. Provisions such as these are exactly what industry requires to build stock that is more affordable and highlight Ipswich's leadership in this space.

However, it is vital that other provisions in the Draft Ipswich Plan 2024 supplement these objectives by allowing the flexibility necessary to unlock a diversity of housing typologies.

The Property Council is particularly concerned by the Building Height and Density Overlay in the draft plan will largely limit lot sizes to 600m² in established residential areas. Combined with the minimum lot size and density specifications in the Reconfiguring a Lot Code this will restrict opportunities for redevelopment and hinder Ipswich's ability facilitate density in well located and serviced infill areas.

As such, the Property Council believe that residential densities in the Low Density Residential Zone should be adjusted to 187.5m² (7.5m x 25m lot). This would be in keeping with some of the smaller lot sizes that have been successfully trialled in the Ripley Valley PDA and have been proven to result in more affordable product.

Additionally, there should be no minimum lot sizes for subdivisions in the low-medium residential zone to enable the development of essential "missing middle" style typologies. This will ensure that the intent behind the welcome initiatives outlined above can be fully realised.

Slope Design

It is concerning that lot frontages are dictated by the slope of the land with frontages expanding as sloping increases. This will curb the development potential of sites and also increase costs for the end consumer - exacerbating affordability concerns.

Additionally, it will add additional unforeseen costs in regard to managing the slope itself. For example, on steep roads smaller frontages are useful as they can be used to limit the height required by a retaining wall by instead employing multiple small walls to progressively "step up" a hill. In the current scheme, Council the larger frontages will result in taller, more expensive retaining walls.

The Property Council believes that Council should reconsider linking frontages to the sloping of the lot to help facilitate product that can be delivered and maintained affordably.

Subdivisions

The Property Council welcomes all subdivisions being code assessable under the draft plan. However, it is worth noting that Moreton Bay Regional Council introduced similar provisions where all subdivisions were code assessable but could not be serviced by subsequent appeals.

Confining development to prescriptive outcomes limits the industry's ability to deliver housing. The property sector should have the ability to engage in discussion around positive development outcomes that fall outside a development code.

Dwelling Houses

Of key importance to our members is certainty. Currently, our members have raised concern around potential inconsistencies between the intended assessment process for Dwelling Houses and the State Government's *Planning Regulation 2017*. Recent changes to the planning act mean that overlays that regulate design of a dwelling house are excluded from the definition of a "relevant overlay". As such, material change of use (MCU) for a dwelling house is prohibited from being impact assessable as a part of a planning scheme if no relevant overlay applies.

Under the *Planning Regulation 2017* a referral agency is correct process for assessing the design and siting of a dwelling house.

Bushfire Overlay

The draft scheme includes bushfire mitigation measures that exceed those already required under *Australia Standard 3959:2018 - Construction of buildings in bushfire prone areas*. As the role of a planning scheme is simply to designate a bushfire prone area the Property Council suggests that draft plan reconsider this in order to align with appropriate process under the *Building Act 1975*.

Small lots

The Property Council believe that many of the current provisions regulating the location of small lots could be reconsidered. Currently, many constraints (in particular hazard overlays) are already addressed during subdivision applications and there is no need to duplicate this.

As highlighted above, facilitating the delivery of small lots will be crucial in responding to current housing affordability pressures and will do much to facilitate the delivery of diversity of product.

Industrial provisions

High Impact Industry uses

There appears to be no zones or locations where high impact industry is code assessable in the draft plan. This is counterintuitive to the statement in the strategic framework (Part 3, section 1.2(3)) that Council hopes to see diversification in the economy and specifies a critical sector as "food production and agribusiness."

Schedule 1 use definitions and Table SC 1.1.2 industry thresholds dictate that food and beverage processing of more than 200 tonnes per year is defined as High impact industry. 200 tonnes is a relatively low threshold and all high impact industry being impact assessable will only add further risk and cost to the very projects that council is intending to facilitate.

Furthermore, it is worth noting that modern food processing technology and trends towards cleaner more sustainable industrial design is resulting in many traditional impacts (such as odour and emissions) being increasingly self-contained.

In addition to food and beverage processing, concrete batching plants would be considered impact assessable as a blanket rule. This is a direct impediment to the delivery of the infrastructure that will

be essential in allowing Ipswich to house its growing population and capture the economic opportunity that it is presented with.

Finally, there are several additional references to high impact industry in the strategic plan that outline Council's intention to accommodate high impact industry uses.

Strategic framework section 2.5(1) says that:

*Substantial areas of industry have been established which provide areas for low, medium and **high impact industry uses**, and are a major source of employment, goods and services for the City, South East Queensland and beyond.*

Section 3.3(3) states that

*Enterprise and Industry Places **accommodate higher impact industries** toward the centre of industry areas, with lower impact industries on the periphery to maximise the separation between high impact and sensitive uses, and provide easy access to low impact service industry uses from residential areas.*

The current planning scheme provides for Special Industry and higher impact General industries as code assessable uses anywhere within the Regionally Significant Business and Industry Area zones (subject to demonstrating no discernible amenity or environmental impacts).

The Property Council recommends that Special Industry and higher impact General Industry remain as code assessable uses within the medium-impact areas and are introduced as impact assessable development within the Low-Impact area of the Regionally Significant Business and Industry zones.

Building height

A016.1 specifies maximum building height of 15 metres.

This does not reflect the changing nature of industry, where automation (e.g. of logistics facilities) is giving rise to high-bay warehouse buildings.

The Property Council provide the following examples of exemplar industrial buildings for consideration:

- Woolworths chilled warehouse, 30 Seeana Place, Heathwood – 20.8 metres – *This building was originally approved at 45.0 metres high however the approval was subsequently amended and height was reduced to 20.8m when they changed their level of automation.*
- Coca Cola Euro Pacific warehouse facility at 260 Orchard Road, Richlands – 20.586 metres high
- Asahi, 14 Seeana Place, Heathwood – 32.825 metres high
- Hilton Foods, 22 Seeana Place, Heathwood – 20.32 metres to ridgeline / 23.9 metres to top of roof equipment
- Teys Cold storage facility at the Port of Brisbane – 26 metres high
- Coles Redbank Distribution Centre – 36 metres high

Flood Risk and Overland Flow Overlay Code

The Property Council understands the purpose of the Flood Risk and Overland Flow Overlay Code is to provide for development that protects people and property and provides for risk responsive design and appropriate development outcomes which are aligned to the flood risk profile of the site, land use vulnerability and overall settlement pattern. The Property Council further notes that the Flood Risk and Overland Flow Overlay Code mapping is informed by numerous data sets including the Flood

Commission of Enquiry, the Brisbane River Strategic Floodplain Management Plan and data from flood events in 2011, 2013 and 2022.

The Property Council does however note that in many instances the mapping is based upon historical underlying topography/terrain profiles and the mapping does not consider the change in landform that has been undertaken by the Development Industry under lawful approvals. Furthermore, the overlays and mapping do not consider the detailed, site-specific flooding and hydrological studies and reporting undertaken for each development site. As a result, many developed areas across the City are erroneously mapped as inundated or containing a high flood which is contrary to the actual onsite landform or the site-specific modelling undertaken for each site.

The Property Council recommend that the draft Flood Risk and Overland Flow Overlay Code is updated to represent the finished landform profile and the site specific flood risk profile as detailed within the approved earthworks, flooding and stormwater management plans for completed developments.

Noise Criteria

The draft scheme provides actual noise criteria, being the acoustic quality objectives identified in *Schedule 6.9 Noise Impact Assessment Planning Scheme Policy*. The objectives are consistent with the *Environmental Protection (Noise) Policy 2019* criteria for residential receivers. This is the same criteria which has been applied for noise assessments for Development Applications made under the current planning scheme and the Property Council are supportive of this ongoing approach.

The Property Council notes that Council have introduced a new clause 6.9.13(2) into the Noise Impact Assessment Planning Scheme Policy which states "*Council may require the use of broadband or low noise 'smart' alarms, despite the achievement of demonstrable compliance with the numerical values listed in Table 1*". The Property Council notes that this could result in conditions requiring broadband alarms being imposed on development despite the developer demonstrating compliance with the acoustic performance criteria stipulated in the planning scheme. This may result in inconsistencies throughout the City and provides the development industry with a lack of clarity as to the required outcomes of development. It is further noted that the *Environmental Protection (Noise) Policy 2008* (a regulation under the *Environmental Protection Act 1994*) does not contain specific outcomes, requirements or recommendations regarding what types of noise are permitted to be generated by development.

The Property Council recommend that Council amend the *Draft Ipswich Plan 2024* to remove the above clause 6.9.13(2) from the Noise Impact Assessment Planning Scheme Policy.

Car parking rates

In the draft scheme car parking rates for industrial use and warehouses have been increased to 1 space per 100m² of Gross Floor Area which does not account for the changing nature of industry and logistics operations, including advances in automation and technology which have reduced the demand on car parking.

The Property Council believe that carparking rates should be maintained at 1 space per 200sqm of Gross Floor Area. This car-parking rate is representative of the requirement of current and future industrial trends.

Landscaping provisions

P08.1 / A08.1.1 to 2 states that acceptable solutions for landscaping include:

- a. 10 meter wide buffer where adjoining land containing a sensitive receptor
- b. 3 metre wide landscape area to the full length of road frontage

By comparison Brisbane City Council only requires 2 metre wide landscape area to frontage. Bringing these provisions in line with Ipswich could be considered to allow more efficient use of industrial land.

Loading and outdoor storage areas

A013.1 states that "loading areas and outdoor storage is not located between the road frontage and the building. In addition, P013.1 also includes that "loading areas and outdoor storage areas are ... located to reduce the visual impact on the public roadway."

These provisions are unnecessary and will hinder industrial development. Street facing loading docks are not unreasonable or unexpected in an area that has been zoned industrial. As such, the Property Council believe that the provisions relating to loading area/storage locations in P013 and A013 should be deleted.

Employee breakout space

A018.1 specifies a 2m² per employee rate for employee breakout space and also that this should be outdoors. This is excessive, and fails to recognise that shift change over times mean that all staff don't take breaks at the same time and that modern facilities typically also include high amenity internal staff areas or lunch rooms that typically include kitchens.

By comparison Brisbane City Council does not specify a square metre rate and instead just specifies a general area be provided.

As such, the Property Council believe that the 2m² prescription should be removed.

Once again, thank you for the opportunity to provide feedback in relation to the draft Ipswich Plan 2024. We would welcome the opportunity to discuss any aspect of this submission in more detail. If you have any questions, please do not hesitate to contact me on jcaire@propertycouncil.com.au or 04 991 813 66.

Regards



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