

Wednesday, 17 July 2024

The Hon. Grace Grace MP
Minister for Economic Development Queensland
Economic Development Queensland
by email only: edq@dcdilgp.qld.gov.au



Dear Minister

The Woolloongabba Plan

Thank you for the invitation to provide feedback on the development scheme and public realm guidelines from the Woolloongabba Priority Development Area. We also appreciate the deadline extension your team granted us to prepare our submission.

The only way out of the housing crisis is to ensure that all tenures and housing types have abundant supply. Housing provision is not a fixed target, and we believe that our policy framework should encourage dwelling supply that is flexible and responsive to market demands and the needs of the community.

We are proud to support Economic Development Queensland and the Queensland Government in building a better Brisbane for everyone.

Key points

- › We support both the proposed development scheme and draft public realm guidelines.
- › In particular, we want to highlight the introduction of private car parking maximums in key precincts as a reform that should be introduced city-wide.
- › While the boundaries of the priority development area are fixed, the Woolloongabba PDA needs to be situated in its local context. Critically, we want to highlight how much surrounding land is locked down in character or low-density zoning, locking future generations out of these neighbourhoods and guaranteeing a broken urban fabric as the new Woolloongabba city centre crashes into these islands of exclusivity.
- › We want to see more ambition for the Logan Road precinct and turn the green spine into something real. We propose an expanded precinct design that transforms Woolloongabba into a green, pedestrian mall — a superblock that discourages non-resident and non-commercial private vehicles by design.

Recommendations

1. The Woolloongabba Plan and open space strategy be adopted in full, but for the following amendments.
2. Close and narrow additional roads within the Logan Road precinct to create a Woolloongabba “superblock”, unlocking an additional 17,000m² of open space.
3. Reduce the speed limit within the Logan Road precinct to 20km/h and make all side streets shared zones.
4. Investigate a new bus interchange on Balaclava Street to support the Logan Road precinct.
5. Retain adequate land within Woolloongabba Core to deliver necessary community infrastructure — including a future high-rise school.
6. Design and deliver a high-rise, multipurpose library and community centre adjacent to the future central park. A commitment as part of this plan will ensure that delivery isn't left to the whim of other or later administrations.
7. Remove podium setbacks in favour of no setbacks when adjacent to open space or a consistent ground-level setback.
8. Permit street and park-adjacent commercial and community activation as a matter of right for all sites within the plan.
9. Remove protections for character residences entirely from the Heritage and character chapter.

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 ensure that we have enough modern, affordable homes for them.

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

Many of our members live and work near Woolloongabba, and many others would like the opportunity. Many are younger renters, first home buyers or simply people 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 thriving communities.

While Greater Brisbane is entirely supportive of the ambition of EDQ's plan, we would like to note that the Woolloongabba Plan is yet another example of Brisbane's obsession with this "spot upzoning" — isolating a handful of neighbourhoods for urban intensification with the implicit (or often explicit) intention of "protecting" wealthy neighbourhoods from the prospect of having more neighbours.

This approach to development 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.

This jaggedness is especially stark with the Woolloongabba Plan, where land expected to develop upwards of 75 storeys crashes into detached homes only 100 metres away.

Limiting capacity through zoning has slowed housing growth, encouraged speculation and prevented diverse housing options from entering the market.

This approach incorrectly assumes that every potential lot will or should be built to its capacity — where in reality, this rarely happens and where it does, it takes a long time.

Limiting land supply through narrow zoning footprints reinforces speculation and creates scarcity that further inflates prices. This is a vicious cycle in which the cost of land is driven up, making it harder for developers to build and for people to find homes.

In the specific case of EDQ's plans for Woolloongabba, there is no consideration given to the sustainability of the development industry and creating new entry-points for smaller, more innovative firms to enter the development market.

With very few exceptions, the cost of land and the scale of development for almost every site within the Woolloongabba Plan means only the largest developers have the capacity, skills or financial risk appetite to deliver these homes.

Ambitious plans like this are certainly welcome, but cannot be a replacement for a new City Plan fit for the 21st century.

Only by rejecting careful rationing of developable lots and favouring a much more ambitious upzoning across our city can we declare ourselves to truly be on the side of housing affordability, a competitive building market, and a better, future-oriented city.

We want all neighbourhoods across the city to realise their potential. We want communities to renew and develop at a pace determined by opportunity, places that welcome human habitation, activity, and localised vibrancy.

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

The ultimate benefit of EDQ's approach is that it can circumvent Brisbane City Council's outdated planning approaches and deep politicisation of modern best practices in urban design.

EDQ's helicopter intervention is seen starkly in this plan, where whole blocks are carved out with jagged lines separating the plan's positive renewal footprint from what is indefensibly a low-density inner city.

But even with these extraordinary powers to reshape our urban planning and get projects delivered, EDQ's scale in its ambitions still fails to match those in ShapingSEQ 2023. Our state government has been clear that we must deliver 70% of all new homes in infill intensification.

However, EDQ's priority development areas show a dramatic reversal, with over 80% of EDQ-led housing growth happening in greenfield expansion areas. It's hard to see how we can achieve our ambition of 70% infill and delivering a compact city when the agency with the most ambition and power to deliver those goals continues the failed paradigm of greenfield master planning.

Given our support for the plans, our submission focuses on the opportunity cost this spot upzoning poses — and interrogates why Woolloongabba will become a walkable urban village, while a short stroll away a “character homes” zoning blanket limits housing opportunity and prime inner-city land to only a handful of wealthy individuals.

Every neighbourhood is owed the possibility of modern, climate-resilient homes, where people can access their daily needs without being dependent on a private vehicle. This should not and cannot be a luxury for a few.



Local context

This development scheme is hemmed in by a hard border that, from the outside, looks mostly arbitrary. Blocks and lots are carved seemingly at random—although they are more likely to protect a special class of homeowners from the indignity of playing a constructive role in our city's future.

To understand why these plans are so important—but ultimately why our city needs to rewrite the underlying City Plan if we want to achieve long-term sustainable affordability—Greater Brisbane zoomed out beyond the arbitrary boundaries of the plan into the broader context.

We situated the plan within a one-kilometre buffer of the PDA boundary—a little over an hour's walk end to end. Within that are the nearest three public high schools, a TAFE campus, two university campuses, two public hospitals, train stations, shopping centres, employment clusters, and some of Brisbane's most iconic tourist destinations.

This is how the people who will live within and around the Woolloongabba Plan will actually experience daily life.

This is their real neighbourhood, not the jagged boundaries imposed by working around arbitrary zoning overlays.



Brisbane's inner south is a patchwork of different plans, schemes and zones that make navigating the future of our city almost impossible for anyone but the most dedicated.

This approach to planning alienates everyone who either doesn't work in the planning, development or building industries or isn't from a narrow group of time-rich people. It's undemocratic because it locks people out from even envisioning what their city will look like, let alone being able to play a meaningful role in shaping it.

To set the context, we looked at what the Brisbane City Council plans for neighbouring areas set as the maximum extent of intensification. The result was a mess.



It's easy to see from this map how quickly and steeply intensification drops off, with the vast majority of these well-located neighbourhoods remaining the exclusive domain of those who can afford a detached "character home" despite being one of the very few Brisbane locations within walking distance of the city's centre.

To fix this problem with arbitrary lines on a map determining the shape of our city — and who gets to live in our most well-located neighbourhoods — Greater Brisbane would like to abolish Low Density, Low to Medium Density and Medium Density zones and review all existing character overlays to ensure only private residences with genuine historical, architectural and social heritage values are protected to set a new flexible foundation for zoning in our city.

Our new **Urban Residential Zone** would apply to all residential, district centre, and mixed use zoned land within 800 metres of a train or Busway station or a major bus interchange and 400 metres of BUZ and CityGlider stops across Brisbane.

It would also apply to specialist centres and industrial land identified as underutilised or needing housing growth within the same catchment. This would not replace neighbourhood centres, land zoned for higher intensity uses or any community, open space, conservation or sport and recreation zoned land.

This new zone would allow any predominantly residential development up to seven storeys, regardless of the lot size. Any other low-impact use — ranging across retail and hospitality, offices, education, health, temporary accommodation or even some light industry — would be permitted. Precinct-scale projects would have to reserve at least 50% of the floor space for residential uses. Car parking minimums would be removed within this zone.

Our new **Suburban Residential Zone** would apply to all other residential land outside the Urban Residential Zone catchment, as well as underutilised industrial and district centre land. However, it would not apply to neighbourhood centres or any community, open space, conservation, or sport and recreation zoned land.

This new zone would allow any residential developments up to four storeys, including detached homes, townhouses and low-rise apartments. Current car parking minimums would be retained in these areas as we would like to see a move away from on-street parking to free up suburban streets for play, planting and active transport.

This zone would also include a *corner store* rule, allowing neighbourhood hospitality, health and retail businesses to operate on any appropriately large or corner lot.

Any home within these zones that should be protected on character grounds would be required to reach the higher threshold for local heritage listing rather than receive special protection merely for being built in a particular place. Brisbane City Council would undertake an audit over three years to translate these blanket overlays into stronger, targeted protections.

We will have more to say on our new baseline zoning during Brisbane's upcoming City Plan review.

Walkability

In preparing our submission, our members put themselves in the shoes of a tourist visiting Brisbane and walked from South Bank to Buranda.

This is a long route, but it would not be surprising for tourists to follow if they want to see Kangaroo Point Cliffs and the Gabba. Certainly, in a future where thousands more people live in Woolloongabba, and it is a thriving hub of restaurants and bars, we hope many will follow the same walk.

Our experience walking this route exposed how poorly connected, confusing and downright hostile our city is if you don't have a private car.

Even with the admirable work EDQ has done with these plans, you only need to zoom out slightly to see how many hard barriers there are to people moving about our city.

The ambitious green spine is cut off at the neck at Leopard Street and at the waist at Deshon Street.

A pedestrian faces missing links that force them to walk across high-speed, multi-lane roads whether that's at the Vulture Street offramp from Captain Cook Bridge...



...or Logan Road trying to access Buranda Train Station and Stones Corner...



... and not to mention the six lanes both ways anyone faces trying to get from the Woolloongabba Core to Upper Logan Road.



The combination of hostile roads, creating barriers crisscrossing and outlining the plan, and the dead zones of low-density or underutilised industrial land just outside them creates a deeply unsafe public realm for anyone who wants to commute by foot, bike, or wheelchair.

Even at a very micro level, the continuation of East Brisbane State School creates an impermeable barrier to anyone wanting to traverse from the newly built-up precincts to eastern neighbourhoods in this plan, permanently disconnecting those new residents from the loci of activity.

Over the lifetime of this plan, The Gabba Stadium must be reenvisioned as a fully permeable space — or at least one with unimpeded circulation around its outskirts.

Fostering a no-parking mindset

The Woolloongabba Plan dreams of a new, modern city centre based around our iconic Gabba stadium.

This dream is to work from an almost blank slate to avoid the disastrous mistakes that often make our CBD a hostile place for residents and pedestrians. These plans go a long way toward achieving that dream, but in many ways they are thwarted by the arbitrary boundaries that hem them in.

Greater Brisbane would like to congratulate EDQ on its visionary and much-needed parking strategy in Schedule 3 of the scheme.

Parking minimums mean that many of our inner-city developments, where most residents walk or ride to get around, ironically have hostile street frontages dominated by garage accesses.

Private car parking is bad for our collective public realm, especially when every individual car park adds \$100,000 to the cost of an apartment. Construction times drag on and costs blow out with every extra floor of excavations or podiums just to store private cars.

We also welcome the bicycle parking and end-of-ride facilities minimums.

This is more technical than would be canvassed by this plan, but with the increased prevalence of larger, heavier ebikes and more people riding cargobikes, the space, orientation and design of bicycle parking — especially outdoor — needs to accommodate those larger footprint bicycles. This is especially important on streets with narrow ground-floor setbacks where a longer bicycle might impede access.

Removing car parking minimums and encouraging bicycle, scooter and shared vehicle parking is an essential first step. Greater Brisbane wants a future where our streets are made for people, not cars. When new major plans like this are released, we should take the opportunity to start permanently closing streets to private vehicle traffic, converting neighbourhoods to one-way superblocks, and taking lanes away from on-street parking or traffic. That's why we have taken EDQ's ambition for the Upper Logan Road precinct to its logical conclusion.

Superblocking Upper Logan Road

The proposed open space strategy for Woolloongabba (Precinct 2) is ambitious, and the plans to close or restrict access to several streets are welcome.

Greater Brisbane invites EDQ to go even further with these plans, recognising that the scale of redevelopment planned for the precinct makes it ripe for a near-total reprioritisation away from private vehicles. The scheme already proposes introducing resident parking maximums and the relatively few existing apartment buildings mean that this proposal would only mildly inconvenience existing residents.

From the exceptionally strong foundations in the open space plan, Greater Brisbane has developed the concept of a Woolloongabba Superblock. This takes EDQ's proposal to its logical conclusion — converting the precinct into a new CBD, removing all but essential traffic from the precinct to the maximum benefit of residents.

Our proposal converts an additional 17,000m² of road surface and services into potential green space mixed with usable public domain. This new green space, alongside the proposed green space in the public realm guidelines are below in *green*.

We propose a one-way in, (mostly) one-way out scheme with an internal circulating loop. The entire precinct would become a Shared Zone with a 20km/h speed limit for all vehicles, effectively extending the traffic calming proposal from S14 across the entire precinct. This is displayed below in *orange*.

In addition to EDQ's proposed road closures, Greater Brisbane proposes the closure of Logan Road, between Stanley Street and Walker Street — except for cross traffic between Jurgens Street and Trafalgar Street; Nile Street — except for cross traffic laneway between Trafalgar and Walker Streets; Lotus Street and Holden Street. Jurgens between Balaclava and Walker would remain two-way, while the rest of the superblock circular would be one-way, including the Trafalgar exit to Wellington.

What limited traffic is expected to enter would enter Jurgens from Balaclava, reduce speed to 20km/h and proceed through Trafalgar to exit onto Wellington. If necessary, the traffic could double back by following a new laneway onto Logan Road, then onto Walker through to Jurgens where it could turn left to exit back onto Balaclava.

Outside this small precinct, further opportunities exist to reduce traffic on nearby roads. We recommend removing on-street parking from Balaclava Street, Wellington Road, Deshon Street and Logan Road to the Buranda roundabout — and converting all but two lanes on Logan Road and Balaclava Street to dedicated bus rights-of-way and separated active transport paths.

This scheme also anticipates the creation of a bus interchange between Balaclava Street and Logan Road, bookending the precinct with high-frequency transit stations.

Our aim is to create nearly seamless pedestrian access from Southbank and Kangaroo Point Cliffs to Stones Corner and Buranda Station. Any fragmentation, whether a road crossing or an impermeable barrier, penalises pedestrian movement.



By implementing this now, rather than trying to retrofit calming and road closures on an existing future community, we can provide certainty to future residents and business operators about traffic conditions, access to their homes and a world-class demonstration of density done well. Compromising in the way the EDQ's existing plan increases uncertainty and trades reduced political pushback now for more arduous debate down the line.

Other comments

We have some minor comments on the technical details of the plans below.

Community facilities

Strong investment in public infrastructure around new developments — particularly where that investment is foreshadowed in early visions like this — 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.

Greater Brisbane strongly supports a new library in the Woolloongabba Core — but we believe that EDQ should take the lead on designing and delivering this library and handing it over to the Brisbane City Council on completion. Leaving the delivery of community infrastructure up to Brisbane City Council, unfunded and at a much later date, means — in the minds of most people — the project is unlikely to happen.

We would like to see a truly world-class library fit for a modern, dense city, using the examples of high-rise, multipurpose libraries like *narrm ngarrgu* (below) and Library at the Dock in Melbourne.

The residents of this new urban village need a community hub — a true civic square that's thrumming with constant activity. We can deliver that right now, showing the community that the precinct's vision will be positive, if the potential is embraced.



On a related note, we support additional education facilities in the local area including delivering a public K-12 school within the Woolloongabba Core to replace the aging East Brisbane State School and flood-prone Coorparoo Secondary College.

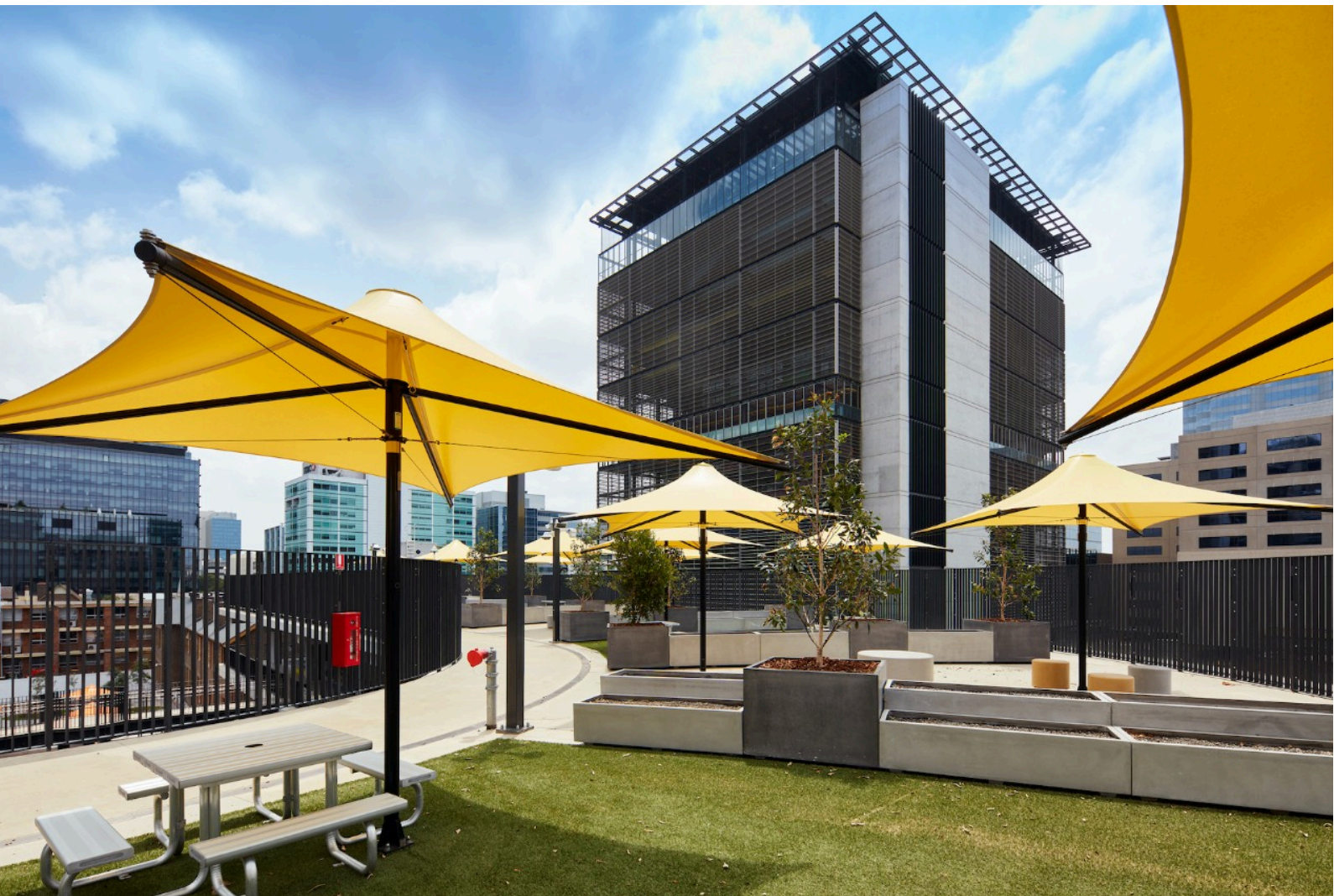
A large, high-rise school adjacent to a new central park would set a new standard for public education in our state. Wurun Senior Campus and Bundha Sports Centre are prime examples delivered as part of Development Victoria's Fitzroy Gasworks precinct — or the new Parramatta Public School and Arthur Phillip High School combined campus (below) with over 2,500 students and up to 14 storeys tall.

This is not a deal-breaker — nor is this an urgent need.

But over the next twenty years, a modern school will be needed to replace existing schools and accommodate the rapidly growing population.

Planning to deliver that now — and putting appropriate land aside — reduces the future cost of finding appropriate land to replace East Brisbane State School at a minimum.

Land that will be extraordinarily expensive after the intensification of the precinct is complete.



Podium setbacks

Greater Brisbane is generally opposed to podium setbacks. We prefer ground-floor setbacks or none at all.

We don't see any utility in staggered setbacks outside of ensuring street trees have adequate light to grow. This “wedding cake” style of having podium setbacks disconnects residents from the street level, reducing passive surveillance and local safety, and facilitating unnecessary thermal bypass. A traditional box building is more attractive, cheaper and offers more floor space for homes.

We would prefer no setbacks on streets where narrowing or conversion to public open space means trees can be planted further away from the curb—or ground-level setbacks on those streets where that won't be happening.

Street frontages

We believe the market is the best mechanism for determining whether a commercial tenancy outside designated commercial zones is viable. Therefore, we do not support restricting low-impact commercial uses to only commercial precincts or major roads.

Greater Brisbane would like to see the Plan encourage the activation of ground-level frontages on all streets with commercial, civic, community, or public uses.

As a general rule, we support the deregulation of “corner store” uses city-wide — that any land appropriate for residential uses is also appropriate for cafes, restaurants, bars, retail or professional services. However, in a more dynamic precinct like this, we do not see much reason why developers should be restrained from any low-impact commercial uses.



Park-adjacent activation

Historically, commercial activation — where street frontage for businesses are permeable and accessible — has faced major roads and streets.

This plan on the other hand envisions a future where the majority of people will walk, ride or wheel, making parks and walkways as lively a space for economic activity as a road's pavement.

This plan creates a large amount of new public open space while largely retaining a requirement that commercial activity be confined to main roads.

We would like to see this plan explicitly encourage commercial activation facing laneways, walkways and parks. We would also like to see limited commercial uses and activities in public open spaces, ranging from outdoor dining or moveable stalls — on the explicit proviso that these uses and activities are non-exclusive and do not infringe on public uses of the space.

That is not to say that parks should require consumption to enjoy them. The best designed parks mix together the many reasons why someone would spend time away from their home. This idea of a third space is key to making great parks and understanding that people have different interests and priorities when it comes to what kind of third space they want to use is why we need to do away with the false binary between commercial and public space. Ultimately, if we want to have well-used parks that people cherish, we need to make the park the centre of that third urban life they lead outside of their home and work. A library at the new park in Woolloongabba Core is a good start — but creating more commercial activation next to every park is even better.

Busy parks, parks with apartments overlooking them, and parks with many uses are safe parks. Vast tracts of unused turf and bitumen are not.



Privately-owned publicly-accessible open space

Greater Brisbane has some misgivings about this category of land.

While we support more private land being accessible by the public and activated in an ecologically sensitive way — like laneways, for example — we are of the opinion that privately owned publicly accessible open space can result in antisocial and inequitable outcomes for the community and lead to exclusion and a monopolised public realm.

For example, West Village in West End has a large “public square” designed to be as hostile to people using the space as possible. Our public spaces aren’t there just to be aesthetic; they serve a utility and should facilitate a range of community uses.

Greater Brisbane would encourage the open space strategy to explicitly address the tendency for privately owned, publicly-accessible open spaces to be designed to be hostile towards the public, especially young people and the homeless.

This should include restrictions on blocking surfaces that people might sleep or camp on including adding crossbars on public benches, installing “move on” equipment like speakers, or architectural or water features designed to be deterrents.

Similarly, guidelines should require access to adequate and appropriate seating (including for sleeping), water stations, bins and appropriately designed, cooled and ventilated public toilets.

Research suggests that generous provision of these amenities — especially public toilets — every few hundred metres along pedestrian thoroughfares increases pedestrian commuting, especially among older people.



Uplift sites

While Greater Brisbane supports greater intensification, we have questions about using “uplift” sites. If greater intensification is desirable, we believe it is better to set the upper bounds (if any) and avoid any discretion for decision-makers to vary that outside of defined public engagement periods like this. This improves certainty for both the community to understand what the future of their neighbourhood holds and developers to know if their proposals will be accepted.

We support their current inclusion, but in the future, we would prefer these upper bands to be uniformly set across the precinct rather than creating pockets of discretion.

Heritage and character

Greater Brisbane generally opposes residential character restrictions — but supports commercial and civic character restrictions that encourage adaptive reuse and sympathetic extensions. In particular, we support retaining the heritage character of the Upper Logan Road (2B) precinct and maintaining these historic buildings.

We believe that heritage should be for our community to use — not for property owners to delay development. Properties that form part of the pre-1911 building overlay should only be protected where it meets a higher standard of heritage protection. In the case of the Plan’s subject area, the majority of properties identified by this overlay are private residences which we do not believe justify protections.

If there are additional character properties that do not currently have heritage protections within the subject area, it is Greater Brisbane’s view that EDQ or Council should acquire those properties and convert them into community use. If neither considers that good value, that burden shouldn’t be passed onto the homeowner.

As such, we do not believe section 4.3.5.2.1 is necessary and should be removed.

Again, thank you for the opportunity to contribute to this important work. Greater Brisbane is always happy to provide feedback on Economic Development Queensland’s work as we strive to advocate for better urban environments for all Queenslanders.

Yours sincerely

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