

The Honourable Dr Steven Miles  
Deputy Premier  
Minister for State Development, Infrastructure, Local Government and Planning  
Minister Assisting the Premier on Olympic and Paralympic Games Infrastructure  
c- ShapingSEQ 2023 Update Project Team  
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Tuesday 19 September, 2023

Dear Deputy Premier

**RE: 2023 Review of ShapingSEQ: South East Queensland Regional Plan**

On behalf of Position Property, please accept our submission to the 2023 Review of ShapingSEQ: South East Queensland Regional Plan.

We share your assessment in the foreword to ShapingSEQ 2023 Update that:

*“Housing stock delivery has slowed for many reasons on both the demand and supply side, and one reason going forward should not be overly restrictive planning requirements that discourage sensible and gentle growth in the right locations that provide fairer opportunities for people to access the homes they need.”*

**About us**

Established in Paddington in 1999, Position Property is now Brisbane’s leading independent multifaceted real estate group.

Through our project marketing division, Position Property is selling residential developments throughout Brisbane for many of Queensland’s leading property developers, achieving more than \$4.2 billion in sales over that time. More importantly, this represents the sale of over 8,500 homes.

Currently, we have 20 projects in market and are working with developers on an additional 52 residential projects anticipated to deliver a total of 2,565 homes over the next 2-3 years.

Position Property works at every stage of the development – from site assessment, project strategy, development and design, marketing, market release, buyer engagement and project settlement, ensuring a considered and liveable approach is taken to the developments we take to market.

## ShapingSEQ 2023 Update

Deputy Premier, as your foreword recognised, the ShapingSEQ 2023 Update forecast that:

*“SEQ is currently home to 3.8 million people and by 2046 it will be home to six million people. This presents an increase of 2.2 million people over 25 years. This will require around 900,000 new homes for residents as well as homes utilised for tourism and short-term accommodation”.*

ShapingSEQ 2023 also acknowledged that:

*“The planning system has an important role to play in reducing housing supply costs, including through regulation and reducing unnecessary red tape for low-complexity housing, and providing greater clarity and certainty around infrastructure delivery and costs. The draft ShapingSEQ 2023 Update acknowledges that the existing statutory framework needs to do more to enable the delivery of more well-located homes than ever before.”*

On 31 August 2023, with the release of Brisbane City Council’s Housing Supply Action Plan, The Lord Mayor of Brisbane Councillor Adrian Schrinner said *“just 724 apartments were completed in Brisbane last year when the average over the last eight years has been almost 4000.”* The Courier-Mail also reported the Lord Mayor saying that *“Council data showed 47,000 apartments or other attached homes approved to be built, but have not been enacted.”*

ShapingSEQ 2023 specifically refers to the Brisbane City Council’s approach to car parking.

The Brisbane City Plan 2014 (SC6.31) stipulates the car parking spaces in multiple dwellings.

For all other cases – outside the City Core and City Frame - the car parking spaces for multiple dwellings requirements were amended in November 2019 to be:

- Minimum 1 space per 1 bedroom dwelling
- Minimum 2 spaces per 2 bedroom dwelling
- Minimum 2 spaces per 3 bedroom dwelling
- Minimum 2.5 spaces per 4 or more bedroom dwelling
- Minimum 0.25 spaces per dwelling for visitor parking

Prior to that amendment, the requirement was for 1.25 spaces per 2 bedroom dwelling, 1.5 spaces per 3 or more bedroom dwelling and 0.15 spaces per dwelling for visitor parking.

The additional requirement for 2 spaces for a 2 bedroom dwelling has been cost prohibitive for developers, with this generally requiring additional basements to be delivered at a high impact to the project feasibility. The list below is indicative of the types of recent residential projects unable to proceed due to the current car park ratio requirements – totalling 574 new residences unable to be delivered to SEQ residents:

- 55 apartments in Chermside
- 130 apartments in Wynnum
- 40 apartments in Mt Gravatt
- 57 apartments in Chermside
- 292 apartments in Everton Park

ShapingSEQ 2023 Update acknowledges how the Brisbane City Council has sought to address this in Brisbane's Inner City Strategy and that:

*"Within the Kurilpa Sustainable Growth Precinct, maximum car parking rates for higher density residential buildings limit car parking supply to promote sustainable forms of transport and to assist in meeting flood resilient design outcomes. The Kurilpa Sustainable Growth Precinct aligns carparking standards to the City Core area providing a maximum of 0.5 spaces per 1 bedroom dwelling instead of the Precinct's current City Frame area which provides for a minimum of 0.9 spaces per 1 bedroom dwelling under Brisbane's Transport, Access, Parking and Servicing Planning Scheme Policy. Providing for maximum car parking rates allows council to identify the appropriate amount of car parking needed for the building and the community and provides a more definitive and transparent approach to car parking limits than the traditional minimums set by local planning schemes. This is a positive shift in practice as a means to provide more affordable living for our residents as we grow."*

Position Property agrees this "positive shift" and a return to pre-November 2019 car parking space requirements would unlock more developments and potentially deliver, from our engagement with developers, hundreds if not thousands of additional apartments. This particularly applies within a 10-15km radius of the CBD where public transport is an effective alternative to accommodating multiple cars per household.

Position Property also acknowledges the landmark investments by the Queensland Government and Brisbane City Council, including but not limited to Cross River Rail, Brisbane Metro and Green Bridges, to improve public transport and mobility around the city and reduce the reliance on cars to work and play.

## Recommendation

Position Property welcomes ShapingSEQ 2023 Update to identifying as an action for local government - *"a review of car parking requirements, with a view to remove minimum car parking requirements, and provide maximum car parking requirements in accordance with best practice for urban planning nationally"*.

Position Property urges the Government to work with Brisbane City Council to fast-track the car parking requirement review as a priority action.

Position Property offers to provide specific details of the projects "parked" or discounted as unviable due to the carparking requirements, and arrange a delegation of affected developers to meet with officers of your Department and their colleagues at Brisbane City Council.

Kind regards,

Richard Lawrence  
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