Australian Institute of Architects QLD

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Strategic Planning (Amendment Package S)
Brisbane City Council

Re: Proposed Amendment Package S

Dear BCC Strategic Planning Project Team

The Royal Australian Institute of Architects Queensland Chapter thanks Brisbane City Council for the opportunity to provide feedback on City Plan Amendment Package S.

The Institute supports the ongoing review and improvement of the City Plan and welcomes the opportunity to provide constructive feedback on several aspects of the proposed amendments. In particular, our members have identified matters relating to bushfire planning, landscape design and green infrastructure, and sustainable mobility where additional clarity and guidance may assist practitioners, applicants and the broader community.

Bushfire Planning Scheme Policy
Members have raised concerns regarding the accessibility and readability of the proposed changes to the Bushfire Planning Scheme Policy, particularly for members of the community who may be less familiar with technical planning terminology.

The use of diagrams, illustrations and worked examples can assist considerably in explaining planning requirements and their practical application. The Institute therefore encourages Council to consider retaining or introducing appropriate visual material to complement the written provisions and improve accessibility for a wider audience.

The Institute also considers that further guidance may be beneficial regarding bushfire risk in suburban settings, particularly where residential properties adjoin parkland, nature corridors or other vegetated areas.

Greater clarity around when vegetation management may be considered necessary or appropriate to manage bushfire risk would assist practitioners and property owners, particularly where bushfire mitigation measures need to be balanced against landscape, environmental and biodiversity considerations.

The Institute therefore suggests that the policy provide clearer guidance and, where appropriate, illustrative examples showing how bushfire risk should be addressed for suburban properties adjoining areas of significant vegetation.

Landscape Design and Green Plot Ratio
The Institute also welcomes the proposed amendments relating to landscape design and green infrastructure. We suggest, however, that further guidance may be helpful regarding the practical application of Green Plot Ratio (GPR) requirements.

In particular, the amendments could more clearly explain how GPR values are to be applied to individual sites and the types, quantity and quality of green infrastructure that may contribute towards satisfying the required ratio.
Providing greater clarity regarding matters such as planting types, canopy provision, deep planting, green roofs, green walls and other forms of green infrastructure would assist applicants in understanding Council's expectations and support more consistent assessment.

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To help achieve high-quality and enduring landscape outcomes, the Institute recommends that the amendments provide additional guidance on both the quantity and quality of green infrastructure expected within relevant developments, together with the methodology Council will use to measure and assess compliance.

Sustainable Mobility and Sustainable Travel Plans
The Institute supports the objective of encouraging more sustainable travel choices through building design, development planning and site-specific measures.

We consider, however, that the proposed provisions relating to Sustainable Travel Plans could provide greater clarity regarding the standards expected of these plans and how they will be implemented, monitored and reviewed over time.

For example, section 12.1.2 refers to achieving sustainable travel outcomes through innovative building design and measures encouraging residents, tenants and visitors to use public and active transport. However, sections 12.1.4, 12.1.5 and 12.1.6 provide relatively broad requirements regarding responsibility for implementation and ongoing management.

Further guidance could assist applicants and assessment officers by identifying the minimum components expected within a Sustainable Travel Plan, the criteria against which plans will be assessed, and the mechanisms through which commitments will be monitored following development approval.

The Institute suggests that Council consider providing clearer guidance, examples or assessment criteria covering matters such as:

- minimum requirements for a Sustainable Travel Plan;
- examples of building, site and operational measures that may contribute to sustainable travel outcomes;
- responsibility for implementation and ongoing management;
- monitoring and reporting expectations; and
- how Council will assess whether proposed measures are likely to achieve the intended outcomes.

Providing greater certainty in these areas would assist applicants in preparing meaningful Sustainable Travel Plans, support consistency in assessment and improve the likelihood that the intended sustainable mobility outcomes are achieved in practice.

The Institute appreciates the opportunity to contribute to the review of City Plan and would be pleased to discuss any of the matters raised above or provide further information if this would be of assistance.

Yours sincerely,

Kim Richards
Queensland Chapter Executive Leader

Yours sincerely,

Andrew Watson
Queensland Chapter Chair of Climate Action and Sustainability