

23 August 2021

City Planning and Economic Development (Industrial Strategy Review)  
Brisbane City Council  
GPO Box 1434  
Brisbane QLD 4000

Dear Industrial Strategy Review Team

### **Our Productive City: Brisbane's Industrial Future**

Thank you for the opportunity to provide industry feedback on *Our Productive City: Brisbane's Industrial Future* (industrial strategy). The Property Council wishes to highlight that we have recently provided feedback to Council on its [Major amendment K package](#), and reinforce this amendment package needs to align with the proposed industrial strategy, in order to unlock economic opportunity for the city.

As you know, 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 360 member companies across residential, commercial, retail, retirement living, industrial, tourism, health and education sectors.

As Brisbane enters its golden decade of opportunity- anticipated through the successful 2032 Olympics Games bid and post pandemic economic opportunities- it is crucial that industry has certainty on Brisbane City Council and State Government's planning intent for industrial land.

The Property Council notes that we have also provided industry feedback on *Brisbane Industrial Strategy 2019*, which resulted in the introduction of a range of amendments that posed challenges to the sector. We are hopeful the current public consultation process assists in resolving these challenges, ultimately unlocking flexibility to cater for the changing nature of industrial use.

We wish to draw Brisbane City Council's attention to the following key points:

- Attractive policy and planning settings need to be implemented, balancing adequate industrial land provisions, as well as maintaining Brisbane's competitive advantage.
- COVID-19 has accelerated the trends and evolution of the industrial sector, prompting a need to focus on major renewal in industrial precincts and to support the strong reliance on logistics and supply chains in our local economy.
- Support the enhancement of flexibility in use rights, ensuring that market demand can be met by the industrial sector, boosting confidence to invest and draw enterprise to Brisbane.

Overall, the Property Council, supports the aims of *Our Productive City: Brisbane's Industrial Future* to facilitate industrial renewal and enhance the amenity of industrial areas.

### **Urban Enterprise Areas**

The Property Council supports the notion of Urban Enterprise Areas (UEAs) as it will encourage high value employment precincts, as well as contributing to the continued development of Brisbane's knowledge economy. However, it is important to note that a blanket approach cannot be applied to these areas, as unique attributes and local market drivers need to be considered.

We wish to query the background research and modelling that Council has undertaken to determine market viability for start-ups and bio-laboratory tenants. The Property Council feels that community engagement has been limited and not consistent with the standard expected of industry. It is important to note that UEAs have not adequately considered the off-site amenity impacts that these types of uses will have on an inner-city locality.

UEAs allow the ideal environment for residential dwellings to co-exist alongside niche manufacturing, provide secondary (rental) income for proprietors of industrial businesses, and the ability for start-up business owners to live and work on the same site to make their venture more feasible. The success in mixed use co-existing, particularly in retail and business centres, is clearly proven. While niche manufacturing is ideally suited to inner city industrial areas they must add to the amenity of the area. The UEAs concept has great potential to facilitate and support existing use, while enhancing the amenity of the local area.

The Property Council would welcome the opportunity to provide further consultation on workable planning scheme amendments that facilitate mixed use, while ensuring the primacy of industrial uses remain.

### **Major Industry Areas**

The Property Council supports the industrial strategy's objective of preserving land for heavy industry to limited, specific locations surrounding the Port of Brisbane and Brisbane Airport, instead of a 'one size fits all' approach to land that is classified as Industry C Zone. However due to its close proximity to important logistics hubs, there also needs to be adequate provision for warehousing purposes within this zone, as the demand for ecommerce increases.

We support a new approach that considers the availability of land suitable for high impact industrial uses in the wider South East Queensland region- not only the Brisbane City Council jurisdiction- which will allow for the removal of restrictions on lower order industry uses in high order zone precincts, alleviating pressure on the finite amount of land available.

The Property Council has previously foreshadowed in our Major Amendment K Package submission to Brisbane City Council that limited concessions for logistics use over 15,000 square metres are insufficient and not compatible with this strategy's objectives to encourage renewal and accommodate the changing nature of the sector.

Flexible planning provisions that also instil confidence and provide certainty in the land use approval process are essential to attract enterprise, business and development to Brisbane. This is particularly true in the instances of approvals in General Industry C precincts, where lower impact industries such as warehousing, logistics, etc are being proposed.

The Property Council supports the allowance of small scale non-industrial uses in Major Industry Areas, as there is an expectation from employees in the precinct they will be able to access basic amenities, such as food and beverage outlets. We welcome Brisbane City Council's proposed incentives to encourage industrial areas to offer higher amenities, that not only service employees, but a local catchment as well.

The Property Council encourages Council to facilitate lower order industrial and warehouse uses (as accepted and code assessable) in high order zones, to ensure that General Industry C Zone land can keep up with market demand, as land supply becomes finite. At present planning provisions fail to recognise the historic and existing use of areas such as Geebung, Rocklea, Larapinta and Hemmant, which contain many long standing small to medium sized warehouse, distribution, and lower impact uses. Under current planning provisions, it would be difficult for such existing facilities to be upgraded or expanded if a proposed redevelopment triggers impact assessment on a site that has been occupied long term.

There is strong industry feedback that locking up General Industry C for the sole purpose of higher order industrial use fails to recognise that most of the zoned land in the localities mentioned above, is already developed and not readily available for large scale redevelopment. It also fails to recognise that due to the modernisation in manufacturing techniques, many high impact industries can- and do- co-exist as neighbouring tenants.

Relaxing use rights across zone precincts, removing barriers to renewal and expansion of historical uses in General Industry C zone will add weight to this objective, as well as supporting the creation of jobs and investments, especially as Brisbane heads towards hosting the 2032 Olympics.

### **Citywide Catalysts**

The Property Council is supportive of the citywide catalysts identified in *Our Productive City: Brisbane's Industrial Future*, especially considering the successful Olympics bid and growth expected in the region over the next ten years, driving further market demand. Our members are particularly keen to be part of an ongoing conversation with Brisbane City Council to implement new statutory actions to support the objectives of this industrial strategy.

### **Colmslie Temporary Local Planning Instrument**

The Property Council has written to the State Government regarding the Temporary Local Planning Instrument (TLPI) overlaid over the Colmslie Road Industrial estate. While we acknowledge this is a State Government planning decision, it is important that both levels of government reach agreement on industrial land use, that meets community expectation and market demand. The Property Council has also requested that State Government seek a solution with all land holders in this precinct.

The Property Council strongly urges both levels of government to facilitate tangible flexibility and performance-based planning outcomes, especially as demand tightens in the next decade. While this does not directly relate to the *Our Productive City: Brisbane's Industrial Future* document, the Property Council feel it is important to highlight as a potential conflict with the industrial strategy document's objectives.

Thank you once again for the opportunity to provide feedback. If you require any additional information or would like to discuss this matter further, please don't hesitate to contact me on 0448 432 936 or [jwilliams@propertycouncil.com.au](mailto:jwilliams@propertycouncil.com.au).

Yours sincerely

A handwritten signature in cursive script that reads "Jen W".

**Jen Williams**  
Queensland Executive Director