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6 December 2019

Peter Tabulo
General Manager Planning and Regulatory
Ipswich City Council
PO Box 191
Ipswich QLD 4305

BY POST / EMAIL – council@ipswich.qld.gov.au

Dear Mr Tabulo,

Re: Implementation of Retaining Wall – Ipswich City Council

The Urban Development Institute of Australia Queensland Ipswich Branch (the Institute) writes to Ipswich City Council (council) on matters related to retaining walls and the current and future provisions related to retaining walls. The Institute is appreciative of the opportunity to provide input to the policy relating to the application of retaining walls in the Ipswich region. In addition, we are grateful for council in dedicating the time in meeting with us in early August 2019 to discuss matters that are of priority to the Institute.

As highlighted at that meeting, the Institute has been working with our members who have raised concerns about council's proposed policies with regard to earthworks and retaining wall design.

It is the Institute's understanding that council is currently undertaking the process of reviewing its policy position around retaining walls, particularly for land development based projects. The Institute acknowledges that it is critical that slope and topography is properly and adequately dealt with as part of the earthworks and construction of greenfield developments. The design and construction of retaining structures in the urban residential context must strike a balance between many factors, including:

1. housing affordability;
2. the aesthetics of a development
3. the amenity of public areas
4. the maintenance of the tiers as part of the structure
5. the subsequent construction of housing
6. the utilisation of private open space and preferences of end users

The Institute's members are at the forefront of dealing with these issues on a day to day basis. As such, it is critical that council engage with the Institute on appropriate policies for retaining structures for residential development in greenfield areas. Given the South-East Queensland (SEQ) region will experience significant growth over the next 10-15 years, housing affordability is essential to ensure all forms the community to have accessibility to housing. The Ipswich region is anticipated to accommodate a significant amount of growth and urban development as a result of it. The South East Queensland Regional Plan 2017 (*ShapingSEQ*) anticipates that the Ipswich region will accommodate an additional 319,900 people and 111,700 dwellings by 2041. 83,800 dwellings will be located in the expansion areas, outside the existing urban areas, and will likely be in the form of detached dwellings in greenfield areas.

Ipswich will need to play a critical role in ensuring the delivery of affordable housing options within SEQ. The Institute has identified that an inflexible and overly prescriptive approach to the design and construction of retaining walls, for the purposes of residential development, will impact upon the industry's ability to deliver affordable housing, especially in the Ipswich context. It is critical that council engage with the Institute on the appropriate retaining structures and typologies for residential development in greenfield areas. We note that the Institute has appointed a new sub-committee in 2019 for council's new planning scheme and would be a valuable source of input in this regard to provide advice on the market delivery and feasibility of retaining structures.

It is understood that council's proposed policy will essentially require walls that are greater than 1.5m in total height to be constructed in two separate tiers separated by a 1.0m wide landscape bench. We can appreciate council's positioning and concern around the public amenity and aesthetics and the construction standards and durability of retaining structures. However, the Institute considers that this would overwhelmingly have negative impacts on delivering the necessary housing in Ipswich. We consider the following impacts need to be considered in the development and application of this policy:

- Impacts to housing diversity and affordability
- Compromised housing designs with a reduction in useable open space in back yards and alongside boundaries
- An increase in the number of sloping lots and or rear and side batters.

Housing Diversity and Affordability

Across many different facets, the current policy shift for retaining structures for residential development will impact on the delivery of diverse housing and choice, and affordability.

The requirement to construct two separate tiers where the retaining wall height exceeds 1.5m will see a reduction in overall yield and densities, whilst tightening supply and altering lot typologies. Yield and densities will be reduced as tiered retaining wall footprints are accommodated, civil costs will increase to accommodate more complex retaining structures, average lot prices will rise as retaining wall footprints increase, and increased dwelling building costs will impact purchasers as they seek to offset the impact of retaining wall footprints in their lots. Combined, the application of tiered retaining walls will restrict housing affordability in the region and will deter private homebuyers/owner occupiers to live in the Ipswich region.

It is important to highlight that a key driver in housing affordability in the region is the ability to deliver dwellings at greater volumes over a given period. Characteristically, these homes are constructed from slab on ground design typified by flat lots. To achieve this, suitable retaining wall structures are required to support the necessary earthworks to facilitate slab on ground products. Developers of subdivisions producing multiple stages and multiple lots, are best placed to provide these retaining walls during civil construction. Furthermore, many of the perceived amenity impacts are likely to not exist following the full completion of housing, which effectively remove rear and side walls from view at a streetscape level.

Walls that remain in the streetscape (public facing), should be treated with more consideration, such as added textures, planting to screen height of wall, and if required, tiering. As such, a multi-faceted approach (rather than a "blanket" approach) is required to dealing with different retaining wall solutions. Applying council's current approach to retaining structures will significantly reduce this ability to deliver homes in volume and will require housing designs to be constructed as split slab levels, or other alternative designs not conducive to affordability.

The Institute recommends that council refrain from implementing a single style methodology to retaining structures and facilitate a dynamic approach to appropriately deal with earthworks and slope.

Housing Design and Private Open Space

The housing design, location, and availability of private open space will be impacted by council's current retaining wall policy position. As previously mentioned above in the context of affordability, the two tier approach over 1.5m will alter, and effectively reduce the allotment sizes as the usable area will be reduced by an increased retaining wall footprint.

Concern arises where the requirement to construct multiple tiers at greater heights encroaches into the private open spaces for future dwellings and reduces the usable private open space within a lot. Usable private open space should be maximised in order to ensure the highest quality of living with smaller lot typologies. If usable private open space areas are reduced, dwelling designs will need revision and will incur cost in order to re-gain the area of lost private open space.

In addition to this, specifically for side boundary retaining walls, usable lot frontages will be reduced to accommodate the additional benching. The impact will be that it will eliminate dwelling typologies that are characterised by smaller lot frontages. In turn, this will increase the land area required for smaller lots, increasing prices on lot types that are purposely designed to facilitate affordable products. This affordability impact will limit the choice of housing for buyers and reduce diversity in dwelling typology.

The Institute recommends that council refrain from implementing a single style methodology to retaining structures in order to preserve the amenity and liveability of future dwellings.

Conclusion

The Institute provides this feedback in the spirit of collaboration as a means of engaging with council to assist with improving the development outcomes in the Ipswich region. We are focused on collaborating with council to support good development and community outcomes that grow a diversified economy. In that respect, the Institute recommends council involve the development industry in the development of this policy position for retaining wall structures for greenfield and land development projects.

The Institute acknowledges that outcomes for public facing walls should primarily be driven by aesthetics and amenity considerations. A careful and balanced approach to designing and constructing retaining walls needs to be achieved to ensure affordable residential communities are delivered. Through both our branch committee and sub-committee for the new planning scheme, we offer our assistance and expertise. We would be more than happy to arrange a workshop around retaining wall typologies and have a greater discussion around the detail.

If you have any questions relating to the matters raised in this letter, please contact Robert Tily – Policy Executive (rtily@udiaql.com.au) on 3229 1589. We would welcome the opportunity to further discuss this letter and look forward to work with you closely to address the Institute's points above.

Yours sincerely,

Urban Development Institute of Australia Queensland



Sam Burgess
Ipswich Branch President