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City Gold Coast  
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**BY POST / EMAIL – [ATZANNES@goldcoast.qld.gov.au](mailto:ATZANNES@goldcoast.qld.gov.au)**

Dear Ms Sheers,

**RE: City of Gold Coast – Our City Our Plan Planning Scheme Amendment**

The Urban Development Institute of Australia Queensland (the Institute) writes to the City of Gold Coast (council) on the 'Our City Our Plan' amendment (the amendment) to the 'Gold Coast City Plan (planning scheme). The Institute commends and supports council in undertaking the process to update the planning scheme to support the delivery of 'missing middle' and fostering a well-designed city.

A well-balanced planning scheme is fundamental to allocate land use planning, development, and infrastructure throughout the region to balance economic, social, and environmental outcomes. In this respect, the Institute lends our experience as the peak professional body for the development industry on the Gold Coast and Queensland.

We highlight that the development industry is a major contributor to the Gold Coast economy; with the industry providing 10.9% of the region's employment and \$7,395.1 million to the Gross Regional Product (GRP)<sup>1</sup>. The Gold Coast region is expected to accommodate an additional 351,000 people and 158,900 dwellings by 2041 as per *ShapingSEQ*; of which 127,900 dwellings are to be within consolidation areas. The amendment must ensure the region is able to sustain the anticipated population growth pursuant to the South East Queensland Regional Plan 2017 (*ShapingSEQ*) and logically plans this growth and development across the Gold Coast. Enabling efficient settlement growth and residential development in an orderly and timely manner will be critical to allow the region to house its population growth.

It is the Institute's understanding that council undertook a 5-year population growth allocation project and determined that, under the current conversion rate, council would not be able to achieve its dwelling supply benchmarks for 2041. We are supportive of council identifying growth areas as part of the amendment, however, urge council to seek greater opportunities to facilitate infill development opportunities particularly in the existing and planned light rail corridors to ensure current and future residents are located within well-serviced locations.

We support council's inclusion of the Courtney Drive Precinct into the amendment and encourage council to provide additional resources into additional investigation areas so that these can be considered, and expanded, to address the lack of supply in the greenfield (individual lots and lower density attached homes) segment of the planning scheme.

<sup>1</sup> The Institute's Research Foundation - *The Contribution of the Development Industry to Queensland*, Urbis, March 2018

In addition, the Institute believes that the introduction of the Low-medium residential zone presents great opportunity to facilitate additional infill development and development within the consolidation areas of the Gold Coast. However, it needs to be explored further to increase its utility to cater for additional housing in established residential areas and meeting the population growth needs.

The Institute has provided further feedback below on the amendments.

### High Density Residential Zone – 12 metre Setback Requirement

The Institute is concerned with the proposed changes to the building envelope requirements within the High density residential zone, in particular the side and rear boundary setback requirements.

The 12m requirement for side and rear boundary setbacks within the High density residential zone is an unnecessarily onerous provision that will effectively reduce the number of homes developed. In turn this will limit the ability to provide a steady supply of dwellings within the consolidation areas and restrict the delivery of a critical housing form, negatively impacting housing affordability.

The availability of land suitable to accommodate the required setbacks is limited. It is apparent council's position will require the acquisition and purchase of adjoining allotments and the amalgamation of these sites. This presents a significantly costly endeavour in acquiring additional land and adds considerable time in further the development project. This could render developments unfeasible, reduce the supply of housing, and increase the price of homes. This will impact the industry's ability to provide affordable housing. The Institute also does not accept that the built form outcome from the proposed setbacks is a desirable one or consistent with the built form character sought for the Gold Coast in past studies, or that required in modern cities.

The Institute has provided a table below comparing the site coverage and setback requirements with other relevant local governments in South-East Queensland to contextualise how high density built forms are provided. The proposed requirements under the amendment represent the greatest setback requirements across the region and the provisions are likely to render most sites unfeasible and limit the provision of steady dwelling supply in the region.

Table One: Other Local Government Site Coverage and Setbacks Requirements

Council (High density residential zone or equivalent)	Site Coverage	Setbacks (Side and Rear) etc	
Brisbane City Council – Up to 15 storeys	40%	6m	12m
Sunshine Coast Council – Up to 37.5 storeys	40%	8m	8m
Moreton Bay Regional Council (Sliding Scale 2m plus 0.5m for every 3m above 8.5m) up to 55m	Not Applicable for sites less than 1,000sqm	7.75m	5m
City of Gold Coast Current – (Sliding Scale 2m plus 0.5m for every 3m above 7.5m) up to 55m	30%	8m	8m
<b>City of Gold Coast Proposed Amendments – up to 55m</b>	<b>30%</b>	<b>12m</b>	<b>12m</b>

The Institute recommends that council reduce the setback requirements or maintain its present positioning around the built form responding to the proposed height.

### High Density Residential Zone – 9 metre Setback

The Institute is concerned over with council's proposal to require a 9 metre side and rear boundary setback for building heights between 33m and 55m. Prescribing a 9m building setback for the side and rear boundaries for building heights at 33m versus 55m will deter the delivery of buildings less than 55m.

A building constructed at 33m high will be required to meet a 9m setback; the same as a building constructed at 55m. The Institute views this as a disincentive to construct buildings closer to the 33 m threshold and will reduce these built forms and typologies from being delivered.

The Institute also considers that the built form that will be delivered from the assessment benchmarks within the High density residential zone will deliver rectangular prisms and will not encourage variations in the built form. In the current planning scheme, the built form within the residential zones for high/medium density development is required to respond to the building height by arranging setbacks based on height of the built form. This allowed for the built form to incorporate variation in the building form and prevented the structure from presenting as one-dimensional. The amendment has sought to enhance the design of the intended built form, however, in the Institute's opinion, this outcome will not be achieved and potentially lead to more adverse design outcomes.

The Institute recommends council provide a more responsive setback requirement related to building height to provide greater variation of built form and seek other methods to enhance the attractive city scape.

### **Low-medium Residential Zone – Minimum Lot Size**

The Institute is, in principle, supportive of the introduction of the Low-medium density residential zone, to encourage further housing diversity in these areas. However, greater facilitation is required for more dense housing opportunities, particularly in the form of small lots.

The Institute considers small lot typologies should be a strong theme within the Low-medium residential zone in order to maximise the delivery of dwelling houses. The amendment facilitates lot sizes from 125sqm (RD5) to 400sqm (RD1) and is distributed throughout the Gold Coast region. The Institute believe that the distribution of RD5 is infrequent and will not deliver small lot housing across the region. Also, the RD1 lot size is too low a density outcome for this strategically important zone.

The Institute believes that council should maximise the opportunity of the introduction of the Low-medium density residential zone to enable the delivery of small lot housing in appropriately located areas. There have been notable examples demonstrated throughout the South-East Queensland region where freehold micro lot terrace products have been delivered that convey an innovative form and typology. This form of development could not be delivered in this zone under the proposed amendment. This typology would only be deliverable within the medium density or high density residential zones, which are not otherwise strategically relevant for small lot housing.

Diverse housing forms and typologies are essential to housing affordability and meeting *ShapingSEQ* dwelling targets that enable the provision of various residential developments, including small lot housing. The Institute recommends that council revise the minimum lot size provisions within the Low-medium residential zone and seek to enable greater variations of lot types.

### **Maximising Density along the Light Rail Corridor**

There is strong logic and sound planning principle on maximising the density of housing in proximity to the light rail stations in order to achieve beneficial planning outcomes and optimise the underlying support for the infrastructure. The Institute acknowledges that council have purposely not undertaken the planning on enabling greater density opportunities along Stage 3 light rail. However, we urge council to commence the forward planning on incorporating denser urban outcomes along the light rail corridor to support the delivery of infill development within the region's consolidation areas.

The Institute recommends council undertake the necessary planning studies that explore options to better utilise the light rail corridor for efficient land use planning and for the betterment of housing affordability.

## Other matters

The Institute also raises the following matters:

- Low density residential zone minimum lot size should be reduced to 400sqm in all instances, not 600sqm. Less than 400sqm should easily be achievable where it is well located for services, amenities and open space at minimum. This is also a standard minimum lot size across South East Queensland.
- Low-medium density residential zone code Acceptable Outcome 11.2 minimum road frontage of 12m is small given the context of small lots. These should be scaled with density and a lot size nominated to facilitate smaller lots.
- Performance Outcome 10 of the Low-medium density residential zone code and Medium density residential zone code should be written as the Acceptable Outcome and allow an alternative solution in the Performance Outcome. The Overall Outcome has no direct reference to density for built form only to infrastructure provisions This will simplify the assessment process, be consistent with the desired theoretical lay out of planning schemes and provide for innovation by the industry.
- Medium density residential zone code Overall Outcomes need stronger policy around to support the prevailing desired character to encourage low-medium rise apartments, medium rise apartments, and high rise in well located places. Land use Overall Outcomes also should remove dwelling houses and small lots. Dwelling houses have the potential to fragment the zone and make consolidating lots more difficult. These changes are recommended to make best use of the important resource that the medium density zone represents for housing supply, diversity and affordability.
- Buildings up to 9m in height (on lots equal to or greater than 400sqm) in the Medium density residential zones should permit a site coverage of 60 percent; consistent with the requirements for buildings greater than 9m. Low-medium rise apartments will then be better equipped to support greater housing diversity opportunities.
- Medium density residential development from 9m-16m in height and 16m-33m has the same rear setback. This setback should be amended to reflect the appropriate intended density as it is not responsive to varying building heights.
- Removal of the greenfield investigation area potentially puts the region's expansion dwelling supply benchmarks at risk and should be consider against the requirements under *ShapingSEQ*. The Institute recommends council commence work in identifying other investigation areas to accommodate future development within the expansion areas of the region.

## Conclusion

Thank you for the opportunity to provide comments on the amendment. The Institute provides this feedback in the spirit of collaboration with council. The Institute takes this opportunity to sincerely thank council for its early engagement with the industry on the amendment prior to the public consultation. In addition, the Institute is appreciative of the time taken to speak and present at our event in September.

In summary the Institute specifically recommends:

- Reducing the setback requirements for buildings over 55m in building height in the High density residential zoned areas
- Maintaining the position of allowing the building height to guide the building setback requirements
- Exploring greater opportunities to allow smaller lot housing within the Low-medium density residential zone
- Seeking greater opportunities to reduce minimum lot size requirements within the Low density residential zones, particularly within well serviced locations
- Responsive frontage requirements within the Medium density residential zone that account for density and lot size

- Stronger Overall Outcome provision relating density and built form, in the Low-medium density residential zone and Medium density residential zone codes, to support density outcomes in the built form
- Stronger Overall Outcomes within the Medium density residential zone code that contains a stronger policy direction and objective on low-medium rise apartments, medium rise apartments, and high rise in well located areas
- 60% site coverage for buildings up to 9m on lots equal to or greater than 400sqm in the Medium density residential zone code to support greater opportunities to facilitate low-medium rise apartment style buildings
- Revising the rear setback boundary requirement of 4m for building heights between 9m-16m to 3m to appropriately reflect the reduced density for buildings between 16m-33m
- Investigating greenfield opportunities to accommodate the anticipated population growth and demand for dwellings in the expansion areas as per *ShapingSEQ*.

We look forward to council's response and offer to meet to discuss these matters in greater detail. If you have any questions in relation to the items raised in this submission, please contact Policy Executive, Robert Tily ([rtily@udiaql.com.au](mailto:rtily@udiaql.com.au)) on (07) 3229 1589.

Yours sincerely,

**Urban Development Institute of Australia Queensland**



Jason Murdoch

**Gold Coast Logan Branch President**