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12 February 2020

Dale Dickson
Chief Executive Officer
City of Gold Coast
PO Box 5042
GCMC QLD 9729

By POST/EMAIL: cityplansubmissions@goldcoast.qld.gov.au

Dear Mr Dickson,

RE: City of Gold Coast – Our City Our Plan Major Update 2 & 3 Round 2 Amendments

Thank you for the opportunity to provide feedback on the second round of consultation for the 'Our City Our Plan' Amendment. The Urban Development Institute of Australia Queensland Gold Coast Logan Branch (the Institute) understands that the purpose of this round of consultation is to seek feedback from the community on significant changes made to the package following the first public consultation undertaken in late 2019.

The Institute welcomes many of the amendments made in response to submissions received during the first round of advertising of the 'Our City Our Plan' Amendment (the amendment).

Our members provide the housing necessary for current and future residents within the region. Ensuring diverse and affordable housing is available to all members of the community is critical. The Gold Coast City Plan (the planning scheme) is a significant vehicle in advancing this objective through regulating land use and infrastructure outcomes.

The Gold Coast region is expected to accommodate an additional 351,000 people and 158,900 dwellings by 2041 as per the South East Queensland Regional Plan 2017 (*ShapingSEQ*). The State Government's Land Supply Development Monitoring Report (LSDMR) 2019 noted that the Gold Coast Region was not meeting its average consolidation dwelling supply benchmarks. Further, the LSDMR highlighted that recent dwelling approvals showed a declining output of attached dwellings (one to three storeys). This is inconsistent with the preferred future outlined in *ShapingSEQ* and indicates that lot supply is under pressure with only 1.7 years of supply rather than the 4 year benchmark.

This amendment, and any subsequent future amendments to the planning scheme, must acknowledge these trends and provide practical solutions to assist housing supply. In general, we commend the City of Gold Coast for implementing the Low-medium density residential zone code to better facilitate low-medium density development in the Gold Coast. However, we believe there is more to do.

The Institute has reviewed the amendment against our previous correspondence on the first round of consultation and note that the following changes have been made to setback provision within the High density residential zone code. More specifically, the amendment has:

- Reduced the setback provisions (rear and side boundary) for buildings greater than 33m and up to 55m in height to 8m from 9m

- Reduced the setback provisions (rear and side boundary) for buildings greater than 55m in height to 10m from 12m.

The Institute is supportive of reductions made, however, we believe that the proposed setbacks are still likely to significantly affect council's ability to meet *ShapingSEQ* infill targets. The Institute highlights that a reliance on lot amalgamations to achieve setback and site coverage outcomes poses significant challenges to the industry. We are concerned the setbacks provision will not facilitate opportunities to provide consolidated built forms for infill areas in the Gold Coast and will impact on housing affordability in the region.

The Institute has identified the following factors that will limit the ability to provide compact, denser forms of dwelling typologies and thereby housing choice:

- Setback requirements for high density residential development
- Introduction of a new overlay, map, code, and impact assessment trigger in the Neighbourhood elements overlay code
- New deep planting requirements
- Minimum lot size requirements for Multiple dwellings within the proposed Low-medium density residential zone.

The Institute has provided greater detail surrounding the items of concern below.

Setback Provisions for High Density Residential Development

The Institute urges council to undertake a further review and consider greater revisions to amend the setback requirements for high density development in the region. This will present a serious impediment to the delivery of high quality forms of residential development which are needed in areas rich in services and amenities, and in close proximity to public transport. There is no form of economic / feasibility analysis to fully understand the impact of these provisions on residential development and provides no certainty that the proposed setbacks will be workable.

A minimum lot size of 2,400sqm would be required to comply with both council's proposed setback and site cover provisions as confirmed in Figure 1 'Analysis of revised setbacks – adapted from submission #291' included in Attachment I *Changes to Our City Our Plan Amendment Package following Public Consultation* document. To achieve acquired lots of this size in consolidation areas, lot amalgamations will be required. Lot amalgamation as a solution is unrealistic and adds to the already significant challenges involved in securing suitable infill land for redevelopment. It is frequently reported that much of the land required for amalgamation is often occupied by unit complexes and fragmented ownership scenarios. In essence, these provisions will continue to stifle development, impact upon housing supply and affordability, and will ultimately result in non-compliant high rise development scenarios through the statutory planning process.

It is noted that council moved away from the 'tower in a landscape setting' design outcome with the introduction of the City Plan in 2016, with the proposed provisions effectively making a return to this development outcome which is characteristic of the large resort hotel style developments such as those evidenced in Surfers Paradise. These developments were established at time when large parcels of land were available or more easily amalgamated due to their low density tenure. What evolved from this 'tower in a landscape setting' design were large 'compound' outcomes, streetscapes with limited activation, and towers setback from boundaries reducing the ability to incorporate Crime Prevention Through Environmental Design (CPTED) principles.

Whilst the setback provisions have been reduced in response to concerns raised by community and industry bodies, the Institute requests council give further due consideration to these provisions and their impact on the city's further growth.

Targeted Growth Areas and Neighbourhood elements overlay code

The Institute raises significant concern regarding the proposed revisions of zoning, building heights, and residential densities in the targeted growth areas (TGA) and the introduction of the Neighbourhood elements overlay and overlay code.

The Institute indicated in its earlier correspondence support for the TGAs and its intention to increase the theoretical dwelling supply and its potential contribution to housing affordability. It is understood that council undertook a 5 year growth allocation project (GAP) which concluded that realistic dwelling capacity, based on historical conversation rates, has performed lower than required under the regional plan and, in turn, will not achieve 2041 targets. This GAP also identified key statistical areas with potential for additional growth being the TGAs. However, it is the Institute's view that the purpose of the TGAs in supporting additional growth is undermined by the latest amendments.

The Institute has found, in reviewing Attachment K – *Changes to Our City Our Plan Amendment Package Following Public Consultation Item 15 – Targeted Growth Areas*, that changes to zones, building height, and residential density will see a reduction of 7,400 people and 6,000 dwellings of theoretical supply in the TGAs. Compounding these changes, the implementation of the Neighbourhood elements overlay, map, code, and impact assessment trigger will impede the ability of the industry to contribute to the objectives of the GAP.

The Institute holds significant concern now for the efficacy of the Neighbourhood elements overlay, particularly the impact assessment trigger.

Triggering impact assessment for development (excluding Dual occupancy and Dwelling house uses) will create unnecessary uncertainty, and will introduce significant cost for homebuyers and potential delay in delivering compact urban living within the identified TGA's. Site cover is a technical matter and considered a crude mechanism for the trigger that will not necessarily drive improved outcomes or limit impact on neighbours. Rather, assessment of non-compliances can be dealt with through a performance based assessment process as is the normal process used within Queensland's planning system to assess matters of non-compliance.

The Institute suggests that more effective solution would be a comprehensive engagement program which focuses on Queensland's performance based planning process, along with the growth challenges the region is facing (and is subsequently being planned for), rather than introduce unnecessary planning provisions as a 'knee jerk reaction' to appease the community.

Furthermore, review of the Neighbourhood elements overlay, and associated overlay code, appears to be an attempt at introducing a quasi local area plan / structure plan for the development TGA. Whilst there are benefits in undertaking a fine grain planning approach particularly for growth areas, it is considered that more work can be done to improve the current overlay map and overlay code to better realise the vision and intent for the TGA and create certainty for future development. The Performance Outcomes (PO) of the code as currently drafted are too broad and have the potential to create confusion as to the development intent and uncertainty during the assessment process to achieving compliance with the POs.

The Institute requests council revisit the Neighbourhood elements overlay and associated overlay code, and refrain from applying an impact assessment trigger for future development contained within the Neighbourhood elements overlay.

New Deep Planting requirements

The Institute raises concern over the additional deep planting provisions contained within the Low-medium residential, Medium density residential, and High density residential zone codes.

The Institute accepts and encourages the provision of planting to work in tandem with the built form to soften the impacts onto the public realm. However, the Institute urges a better balance between the amount of deep planting required and the proposed built form. Excessive deep planting requirements have the potential to

impact housing affordability if large dedicated spaces are required to be set aside to comply. The Institute highlights a number of opportunities to improve the 'greening' of the region's built form through a number of initiatives which may achieve the desired result, without increasing the current deep planting requirements:

- Allow for deep planting opportunities (in the Multiple accommodation code) within the private open and communal spaces to maximise greenery over the whole site
- Support opportunities for green screening and vertical trellises to complement and enhance variation to the built form
- Amending the definition of a 'storey' to allow the addition of a rooftop amenity space which incorporates significant landscaping and shaded recreational areas, without being included as a 'storey' for the purpose of maximum storeys allowable under the planning scheme
- An incentives program to encourage applicants to deliver green rooftops, vertical green screens and/or additional landscaping.

A table has been provided to compare deep planting requirements against other South-East Queensland local governments.

Local Government Deep Planting Requirements	Deep Planting Requirement		
Brisbane City Council – Multiple dwelling code	10% of the site area		
Sunshine Coast Council- Business uses and centre design code	10% of the site area		
Moreton Bay Regional Council – Residential uses code	5% of the site area		
City of Gold Coast Where no assessable vegetation is retainable.	Low-medium density residential zone	Medium density residential zone	High density residential zone
	15%	15%	10%

The Institute recommends council reduce the additional deep planting requirements to 10%, in line with the other local governments outlined above to achieve appropriate level of green with the dense built form that also make provision for basements and podium development.

Low-medium Density Residential Zone – Minimum Lot size Requirement for Multiple dwelling

The Institute has previously expressed support for the Low-medium density residential zone to provide an appropriate transition from low to medium density. This zoning also provides the platform to deliver the 'missing middle' and fill the housing gap and enable greater housing choice and diversity.

The Institute is concerned that the minimum lot size requirement will exclude some housing development without achieving significantly better development outcomes. The Institute is concerned a range of proposals and innovations that deliver more housing choice for our increasingly diverse community in the Gold Coast may be discouraged by the proposed minimum lot size.

The Institute recommends council remove the minimum lot size requirements and seek other mechanism to resolve built form outcomes.

Conclusion

Thank you for the opportunity to provide comments on the amendment. The Institute provides this feedback in the spirit of collaboration and commends the effort demonstrated by council in undertaking community consultation both with the industry and residents.

Significant investment is required in identifying and implementing infrastructure to council's identified growth areas. It is important that the necessary work is undertaken to ensure the network infrastructure has and will have capacity to accommodate the densities planned in those areas. This not only involves updating the Local Government Infrastructure Plan to suit, but also ensuring that urgent funding is being allocated to undertaken essential network upgrades. Without the infrastructure in place, the dwelling targets cannot be achieved.

The Institute, noting the difficulties with reconciling community views on infill development with the challenge of accommodating population growth, encourages council to undertake further public engagement and consultation, particularly within existing and established urban areas. Failure to achieve these results, requires further action for additional greenfield growth areas.

The Institute's Research Foundation highlights the importance of consulting with the community early to minimise, and potentially mitigate, against any surprises that may occur. We welcome the opportunity for council, as a valued member of the Industry Leaders Research Group, to collaborate with the Institute in any community consultation exercise in the future.

In summary the Institute specifically recommends:

- Avoid policy that relies on the development industry's ability to amalgamate lots to achieve and accommodate projected growth
- Avoid using impact assessment triggers for development within the Neighbourhood elements overlay to avoid excluding housing activity
- Revising the additional deep planting required within the residential zones to align with the other South-East Queensland local governments and acknowledge other planting treatments
- Removing the minimum lot size requirements of 800sqm (greater than 12m) for Multiple dwellings within the proposed Low-medium density residential zone.

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@udiaqld.com.au) on (07) 3229 1589.

Yours sincerely,

Urban Development Institute of Australia Queensland

Jason Murdoch

Gold Coast Logan Branch President