



23 April 2020

Alisha Swain
Director Economy, Planning & Environment
City of Gold Coast
Gold Coast Mail Centre Qld 9726
PO Box 5042

BY POST/EMAIL – aswain@goldcoast.qld.gov.au

Dear Ms Swain

RE: City of Gold Coast Pre-lodgement Feedback

The Urban Development Institute of Australia Queensland's Gold Coast Logan Branch (the Institute) writes to the City of Gold Coast (council) to provide feedback on your pre-lodgement services. The Institute supports council's commitment to improve services and ensure pre-lodgements add value to the development assessment process.

We commend council in reaching its first year milestone of delivering an upgraded pre-lodgement meeting service. High quality pre-lodgement services are highly beneficial for both the property development industry and council and allows our members to suitably accommodate and respond to any issues identified. This in turn can ease the passage of the development assessment process and ensure the delivery of new dwellings for Gold Cost residents sooner.

Quality of Pre-lodgement Minutes

The Institute has received feedback with respect to minutes distributed post pre-lodgement meetings. Some members have indicated that the minutes do not adhere to typical minute taking protocols. It is recommended the minutes should:

- Record outcomes of the meeting that notes agreed and disagreed between applicant and council
- Record of outcomes that may require a further investigations and additional engagement
- Be circulated for acceptance by the other party before being adopted as a true record of meeting
- Be produced with 48 hours of the meeting concluding.

The industry acknowledges that the pre-lodgement meeting process and meeting minutes is not a "Pre-Approval" process but is necessary identify where further detailed investigation and engagement of professionals is required to assist in the assessment process.

Communication

Our members have observed that the pre-lodgement meeting has led to council officers restricting advice or comments in drafting technical reports prepared by consultants post pre-lodgement meeting.

An example provided relates to a technical consultant and the need to discuss technical matters with council's relevant technical officer being restricted to the pre-lodgement meeting. Often engagement between the technical professionals deliver the best outcome or at least provide an explanation for each party's stance.

We do acknowledge that certain technical officers such are receptive to the engagement prior to and during the process but this is not a consistent approach. The Institute encourages that interaction during the report preparation phase and should be not dissimilar to the interaction during the assessment phase.

Conclusion

We take this opportunity to thank council for considering the matters raised in this submission. The Institute is very supportive of this process and welcomes council's commitment to improvement of the pre-lodgement service.

We acknowledge that some of our members utilise pre-lodgement during preliminary site acquisition investigations and others use pre-lodgement as a preliminary assessment process.

The Institute is mindful of the impact that this can have on council's time and it may be appropriate to clarify this area further. However, we think multiple pre-lodgement meetings are very important to work through specific items, minimise cost should reworking be required, discussion of performance based planning outcomes, and to enable reaching a mutual interpretation before formal lodgement of the application occurs.

Overall, the Institute acknowledges and supports the efforts of council to continually improve and optimise its services to ensure quality outcomes for the community. The Institute provides this feedback in the spirit of collaboration and as a means of genuinely engaging with council to improve development related services.

If you have any questions relating to the matters raised in this letter, please contact Policy Executive, Robert Tily (rtily@udiaqld.com.au) on (07) 3229 1589. We would welcome the opportunity to further discuss these items and work with council closely to address them.

Yours sincerely,

Urban Development Institute of Australia Queensland

Jason Murdoch
Gold Coast Logan Branch President