



11 June 2020

Alisha Swain
Director Economy, Planning & Environment
City of Gold Coast
PO Box 5042
GCMC Qld 9729

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

Dear Ms Swain,

RE: Our City Our Plan - Jefferson Lane Public Consultation

The Urban Development Institute of Australia Queensland (the Institute) writes to the City of Gold Coast (council) on its third round of consultation for 'Our City Our Plan' which proposes a specific change to the residential density overlay mapping.

We understand that the change reflects the second round of consultation on the proposed reductions in building height and residential density not reflected at the time in the residential overlay map. The Institute accepts this specific change as consistent with council's height intentions but has concerns with its relation to the wider direction of building height and density changes. According to the Grattan Institute, the housing market is one of the few that behaves in reality as expected in theory; in that scarcity of homes results in increases in home prices to the considerable detriment of those segments of the community seeking to buy a home, particularly those families already experiencing housing stress.¹ It is our view that the changes will reduce the production of new housing and induce price-increasing scarcity.

As the Gold Coast emerges from the COVID-19 health crisis, we of course understand that there will be some volatility in the property market as consumer confidence adjusts and moves towards pre-COVID levels. However, the Institute urges council to maintain a forward-thinking posture, with a view to meeting the benchmarks set out in *ShapingSEQ*.

We reiterate our previous concerns raised during council's first (11 November 2019, attached) and second (11 February 2020, attached) rounds of consultation. These include the impact of the changes on the ability of the city to meet the housing benchmarks of *ShapingSEQ* by:

- Increasing setback requirements for the High density residential zones that reduce infill achievement

¹ Daly, J. 2019. The Future of Housing. 28 February 2019, Brisbane

- Reducing housing density opportunities within council’s newly designated Low-medium density residential zones and the Gold Coast’s light rail corridor
- Significantly reducing the population and dwelling potential of the Targeted Growth Areas and impact on assessment certainty of the Neighbourhood elements overlay code.

We also raise a new point emerging from council’s first round of consultation in relation to carparking in podiums. We consider council’s position on carparking for multiple dwelling type land uses to be a considerable shift that has significant consequences for delivering affordable apartment homes. The new requirement for car parking locations to be below ground or at grade only impacts negatively on the costs of residential development, likely reducing the supply of housing in the Gold Coast.

To illustrate this point, the Institute has provided a table below outlining the cost in prescribing carparking underground, where at grade cannot be achieved:

Gold Coast Region	
Cost to Provide Basement Car Parking	An additional \$40,000 build cost per unit
Feasibly Impact	Average 2 bed unit price increase of \$129,000
Comments:	Development project would not be feasible

The consequence is that, given the additional cost, projects will not proceed as it would be unfeasible to deliver. Where there is an inability or barrier to deliver housing supply, there will be direct consequence to the affordability of housing.

The Institute strongly recommends council does not proceed with restricting parking within or behind tower bases/podiums. We urge council to work with the Institute on alternative, aesthetically pleasing provisions that can accommodate car parking in podiums, such as sleeved or architectural treatment of parking. More broadly, the Institute encourages solutions to reduce car dependency within the region and resolve the issue at its source.

We once again reiterate that the planning scheme amendments have not provided for a diversity of housing choice with little or no additional supply being made available in the low density and emerging community zones. We are eager to collaborate with council on amendments 4 and 5, particularly with respect to greater opportunities to create the much sought after “missing middle” product.

Thank you for considering the items raised in this submission. We look forward to continuing our on-going engagement with you in order to seek improved development outcomes for the Gold Coast community. If you have any questions, 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