

21 August 2015

Cr Allan Sutherland
Mayor
Moreton Bay Regional Council
PO Box 159
Caboolture, Qld 4510

Dear Cr Sutherland

Please find enclosed the Property Council's submission on the *New Draft 2015 Moreton Bay Regional Council Planning Scheme*.

Regards,



Jen Williams
Queensland Deputy Executive Director

Submission on the New Draft 2015 Moreton Bay Regional Council Planning Scheme

21 August 2015

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1. Introduction

Thank you for the opportunity to provide feedback on the *New Draft 2015 Moreton Bay Regional Council Planning Scheme* (planning scheme).

The Property Council is pleased to note that Council has taken on board many aspects of the feedback provided in our submission on the earlier draft of the planning scheme.

Additionally, we commend Council for taking the initiative to carry out such a thorough review of the earlier draft of the planning scheme and implement considerable policy changes to reflect community concerns.

As highlighted in August 2014, the planning scheme is an incredibly long and at times unwieldy document. We note that the new draft is even longer than the earlier draft planning scheme.

While most of the codes are written in plain English and easy for users to understand, greater use of sub-headings, hyperlinks and colours would assist users in navigating individual sections of the document.

The following pages highlight a number of concerns and suggestions for your consideration in finalizing the planning scheme.

2. Summary of recommendations

1. Implement a formal mechanism to challenge overlay mapping
2. Ensure higher order assessments reduce the level of assessment for subsequent applications
3. Lower the car parking requirements for residential uses
4. Refine industrial use criteria to reflect market requirements
5. Ensure infrastructure planning includes anticipated growth areas

3. Property industry's contribution to the Queensland economy

The property industry in Queensland creates the homes we live in, the offices in which we work, and the shopping centres and recreational areas where we spend our leisure time.

It has a larger footprint on the Queensland economy than any other industry¹.

3.1 Contribution to Gross State Product (GSP)

The property industry directly contributed \$33.8 billion to GSP in Queensland in 2013-14, representing 11.4 per cent of total GSP.

It is estimated to have contributed a further \$49.9 billion to Queensland GSP through flow-on demand for goods and services.

3.2 Contribution to employment

The property industry directly employed 239,772 full time equivalent (FTE) employees in Queensland in 2013-14, representing 12.1 per cent of the state's workforce.

The industry also supported some 292,684 additional FTE jobs through flow-on activity.

Approximately 27.4 per cent of wages and salaries paid to Australian workers are generated by the property industry.

3.3 Contribution to government revenues

The property sector in Queensland contributed approximately \$9.9 billion in combined State Government tax revenues and local government rates, fees and charges revenue in 2013-14. This equates to 49.8 per cent of total State taxes and local government rates, fees and charges revenues in 2013-14.

3.4 Contribution to the Moreton Bay economy

In 2013-14, the property industry contributed more than \$1.97 billion to Moreton Bay's Gross Product (almost 15 per cent) and provided full time work for more than 14,800 people- over 15 per cent of jobs in the Moreton Bay Regional Council area.

¹ All the statistics in this section are sourced from AEC group, 2015

4. Flooding and coastal management

Limited development zones

When the earlier draft planning scheme was released in 2014, the Property Council raised significant concerns with the use of limited development zones in areas mapped as subject to flooding and/or the potential to be affected by the future impacts of climate change.

We are pleased to note that the extent of limited development zones has been considerably reduced.

Overlays

The Property Council has ongoing concerns regarding the use of overlays and the ability for development proponents to challenge incorrect mapping outside of the development assessment process. A formal mechanism for challenging the mapping (for all overlays, not just flooding) would reduce time and cost impositions for both applicants and Council.

Additionally, we are keen to see a mechanism included in the planning scheme whereby higher order assessments reduce the level of assessment for subsequent applications. For example, where the constraints within an overlay have been addressed through a material change of use application, the subsequent development that occurs on that site should be subject to a lower level of assessment.

Elevating material change of use and reconfiguration of a lot applications to impact assessment as a result of the coastal hazard overlays is considered unnecessary. Constraints may be able to be resolved through code outcomes, or may not be relevant due to previous works on the site.

It is questioned whether or not this elevation in the level of assessment adds any value to the overall process.

5. Land uses

Residential

The Property Council notes the requirements for residential lot mixes outlined in the planning scheme are unlikely to match the market demands of many developments, as the range of required lot types is too broad.

Additionally, with a commitment to housing affordability, we are disappointed to note the requirement for 3 car parks for each residential dwelling. While this is considerably lesser in a number of key development areas, it is considered to be excessive and will add unnecessary costs to new housing product.

These excessive rates are also reflected in the provisions for residential care facilities, where 7 spaces per 100m² are required. This is well above the actual usage of the residents, who primarily have limited mobility.

The Property Council is keen to see Council reduce these requirements- along with minimum widths for residential streets- in order to retain downward pressure on the cost of housing in the region.

Industrial

As noted in our submission on the earlier draft planning scheme, the change in definition of industrial zones has meant that existing operators of medium impact uses in the new mixed use and business areas may be restricted in the expansion and adaptation of their operations through limitations on uses such as retail, showroom, and hardware and trade supplies.

A number of other recommendations regarding limitations on industrial development were provided by the Property Council, to better reflect the requirements of the market. A number of these have been addressed, however we are still keen to see:

- Amendment to the servicing requirements to reflect those in the current planning scheme
- Increase in the combined area for display and retail sales to a maximum of 10 per cent, up from the stated 5 per cent
- Limits on ancillary office increased to 20 per cent up from the stated 10 per cent

6. Infrastructure

When released for public consultation in May, the Property Council lodged a submission with Council on the draft *Infrastructure Charges Resolution* and associated *Implementation Policy*.

Through this submission we noted our members' concerns that key emerging areas within the region have been excluded from the Priority Infrastructure Area (PIA).

These concerns remain, as we note considerable areas identified for future growth have no or very little mapping for trunk infrastructure such as roads, sewers and parks.

Excluding trunk infrastructure from planning instruments means many applicants will be required to rely on the trunk conversion process, imposing additional time and costs on both Council and the applicant.

The Property Council is keen to ensure that Council's infrastructure plan reflects the region's growth patterns foreshadowed in the planning scheme.

7. Conclusion

The Property Council would like to again thank Council for the opportunity to provide feedback on the *New Draft 2015 Moreton Bay Regional Council Planning Scheme*.

If you have any further questions about the Property Council or the detail included in this submission, please contact Chris Mountford on 07 3225 3000, or cmountford@propertycouncil.com.au.

Yours sincerely



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