

2014 CORPORATE PARTNERS



Cr Tom Tate
Mayor
Gold Coast City Council
PO Box 5042
GOLD COAST MAIL CENTRE QLD 9729

Dear Cr Tate *Tom*

Draft City Plan 2015



The Property Council of Australia, Gold Coast Chapter, has given significant consideration to the current *draft City Plan 2015*. Our members come from many fields within the construction and development industry and there have been a wide range of comments made to the committee by members that reflects these divergent activities and interests.



Among these comments there are a number of recurring issues raised by our members and the attached submission concentrates on these, as a submission from a whole of industry body.



Our submission is offered with the sole intention of helping make the final City Plan a document that will guide the next 10+ years of development of the Gold Coast in ways that create an enticing and thoroughly liveable city for both residents and visitors while also encouraging developers to continue to actively participate.



Of particular concern to the industry in achieving this vision, is Council's decision to increase infrastructure charges from 1 July, 2014.



At a time when the City of Gold Coast should be encouraging development, this increase in charges sends a negative signal to the property industry, reduces the feasibility of projects, and ultimately increases costs to end users.



Finally, we commend Council for the time that staff have made available to liaise with industry representatives to discuss and clarify matters relating to the Draft City Plan 2015. In this spirit, our Gold Coast Chapter would be pleased to participate in future discussions or working groups.



Yours sincerely



Kathy Mac Dermott
Executive Director



1. Vegetation Management and Environmental Offsets

With the introduction of a new Queensland Government Environmental Offsets Framework on 1 July, many of the provisions within the Scheme's offsets policy now conflict with the State's requirements.

In accordance with the *Environmental Offsets Act 2014* and supporting regulations, the Scheme's offsets policy will need to be redrafted to ensure the maximum costs do not exceed those in the legislation, and the requirements do not duplicate those of another level of government.

2. Accommodating Population Growth

The scheme indicates (correctly) that there will be significant population growth within the city. We are not convinced that the provisions for infill growth together with the amount of land available for new greenfield development will collectively cater for this projected growth.

2.1 Greenfield Development

- There is no recognition of the (very) small lot opportunities, despite local existing successful examples.
- The land available for development is very limited. A number of the investigation areas noted in Map 1 are existing park residential areas with very fragmented ownership. As such, the realistic increase in supply of additional dwellings from these areas is likely to be much less than anticipated.
- Some currently approved and substantially completed residential estates are not shown as residential zones.

2.2 Infill Development

- The (limited) changes to height and density provisions are not likely to create sufficient opportunities for the scale of infill development across the city that is envisioned in the population projections.
- There is no recognition of Bundall as an area that could – and should - sustain a significant residential population in a variety of medium and high density developments. Indeed this increased population in Bundall will be a significant catalyst in the success of the upcoming Cultural Precinct and will also assist in achieving the target infill numbers. Bundall is close to all major services and has public transport and good road linkages.
- There has been discussion within Council for over 10 years about utilising these assets and yet the scheme does not move these discussions forward in any way.
- Including a prescribed unit mix for high-rise residential (with only 20 per cent variation allowed) will only be a deterrent to development. Using the same mix across the city is even more concerning and further diminishes the existing local flavour of different centres.

- Car parking provisions for multi-unit developments should vary depending on proximity to services/public transport, etc.
- The jump from 1 space/2 bed unit to 2 spaces/3 bed unit is far too great.
- The requirement for 2 spaces/dwelling for a dual occupancy should be reduced to 1 space for the second dwelling.
- The size limit of 80 square metres for the second dwelling of a dual occupancy should be deleted in favour of outcome driven requirements relating to over-viewing / amenity / outdoor recreation space, etc.
- The current variety across residential zones along the coastal strip adjacent to the beach should be encouraged and enhanced. This variation is an important component in reinforcing the varying characters of these places.
- There seems to be a move to provide broad-brush provisions that will lead to increased uniformity of development.
- These provisions also do not reflect existing developments in some areas (e.g. Miami, Mermaid Beach).

3. Industrial Land Supply

- Significant amounts of current industrial land have been down-zoned. This will likely inhibit the opportunities for employment growth.
- The widened requirement for Impact Assessment will be a deterrent for small to medium sized enterprises looking for new premises.
- Council should undertake a detailed planning study (as allowed in the State Planning Policy) to determine appropriate separation distances and buffers so as to retain existing zonings wherever possible.

4. Centres Zones

- The emphasis on Centres is welcomed, however there needs to be acknowledgement that Centres of equal standing (e.g. District Centres) in different locations within the city will have widely varying characteristics and characters. This variety should be encouraged and even reinforced by the scheme. The desired outcomes should be tailored to suit individual centres.
- Burleigh Heads and West Burleigh are significantly different and should be separated to make sure this differentiation is nurtured.
- Residential development should be encouraged in all Mixed-Use Zones.
- There appears to be some discrepancies regarding required setbacks.
- Carrara Centre does not appear to have been progressed at all.
- Maximum shop sizes for Code Assessment do not reflect current requirements of major tenants, e.g. a supermarket is often greater than 4,000 square metres and a discount department store is usually greater than 6,000 square metres. These size restrictions lead to the likely requirement for Impact Assessment and will reduce the likelihood of an application being made.
- Surfers Paradise Specialist Centre should include more provisions to encourage permanent residential uses.
- The nominated 50,000 square metre cap on office space at Varsity Station Village appears to be far too high to be relevant during the life of this scheme.

5. Flood Overlay

- There is still a requirement for flood-free access and no acknowledgement of refuge in place provisions as an acceptable alternative solution. This is likely to exclude areas such as Peninsular Drive, Surfers Paradise from being re-developed, thereby further limiting the ability to achieve the nominated amount of infill housing.
- The exemption from flood storage requirements for houses appears to have been deleted. This will make it very difficult to redevelop these sites with new houses and particularly dual occupancy.

6. The Beach

The beach is an intrinsic part of our city. It is the main reason that tourists come here and a major reason that residents move to the coast. This significance should be highlighted and careful attention given to creating a framework for the beaches and the immediate surrounds.

7. General Notes

- Consider minimum densities along the light rail to encourage densification.
- Introduce ability to include 'micro-lot' housing with appropriate design guidelines.
- Reinforce the strategic provisions to encourage east-west corridors.
- Encourage affordable housing through appropriate bonuses.
- Assist in unlocking the development potential within existing body corporate developments by making representations to the State Government.
- Delete the need for specialist social planner inputs on all except 'public realm' buildings.
- All provisions of the scheme should be aligned to maximise the possibilities for development on the Gold Coast that enhances the city environment.