

## **Submission on Draft Redland City Council Planning Scheme 2015**

**27 November 2015**

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## 1. Introduction

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Thank you for the opportunity to provide feedback on the *Draft Redland City Council Planning Scheme 2015* (draft City Plan).

The draft City Plan has significantly streamlined the policy intent of the *2006 Redland Planning Scheme* while maintaining the key policy positions and a strong focus on infill development.

Although the new *low-medium density residential zone* and efforts to promote urban infill are welcome initiatives, demand over the extended planning horizon of 2041 will require Redland City Council to identify and zone a greater number of greenfield sites within the local government area.

To achieve the strategic intent of the City Plan, the greatest flexibility will be required to ensure that the expected residential and employment growth can be accommodated over the extended planning period.

The Property Council welcomes the extended period of consultation undertaken by the Redland City Council on the draft plan. By inviting community feedback for double the statutory minimum consultation period, Redland City Council will enjoy greater opportunity to benefit from considered input.

This submission highlights a number of areas of support for Council's approach, as well as areas of concern with the draft City Plan and suggestions for your consideration in finalising the planning scheme.

## **2. Summary of recommendations**

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1. Ensure the inclusion of potential growth areas identified by Council, within the 'emerging community' zone
2. Introduction of lower levels of assessment for retirement facilities to accurately represent the low impact of these developments
3. Remove duplication of assessment triggers between the tables of assessment and zoning designations
4. Ensure a greater amount of industry zoned land to ensure future growth opportunities
5. Create a formal mechanism for challenging overlay mapping in order to reduce time and cost impositions for both applicants and Council.
6. Ensure a new Redland City Council infrastructure plan is developed to incorporate anticipated growth areas

### 3. Property industry's contribution to the Redlands economy<sup>1</sup>

## REDLANDS' BIGGEST INDUSTRY ACCOUNTING FOR 16.9% OF THE AREA'S ECONOMIC ACTIVITY



## CREATING JOBS - PROPERTY IS REDLANDS' LARGEST EMPLOYER

**6,600 JOBS**

PROPERTY INDUSTRY



**3,000 JOBS**  
MANUFACTURING



**500 JOBS**  
MINING



The property industry employs  
more people than mining and  
manufacturing combined

## BUILDING PROSPERITY BY PAYING \$870 MILLION IN WAGES & SALARIES



**1 IN 3 PEOPLE**

IN REDLANDS DRAW THEIR WAGE DIRECTLY  
AND INDIRECTLY FROM PROPERTY

<sup>1</sup> All the statistics in this section are sourced from AEC group, 2015

## 4. Land use zones

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### 4.1 Residential zones

By 2041, the planning horizon for the State Government's impending update of the South East Queensland Regional Plan, the population of the Redland City local government area will have grown by 50,000 people.

The Property Council contends that the limited amount of land zoned for emerging communities and the residential lot mixes outlined in the draft planning scheme are unlikely to match market demand. The inability to achieve adequate residential land supply will result in a failure to achieve Council's objective of housing affordability within the context of a liveable community.

To accommodate demand growth, the greatest flexibility will be required within the local planning scheme.

The Property Council welcomes the adoption of the new *low-medium density residential zone* to support small lot residential development. This move will ensure market flexibility to deliver a greater variety of housing stock for Redland residents.

The reclassification of land from the existing *residential low density zone*, with a minimum lot size of 2000sqm, to the new *low-medium density residential zone*, with a minimum lot size 400sqm will create more flexibility to meet growing demand.

Although the *low-medium density residential zone* has primarily been applied to the major neighbourhood centres and areas surrounding public transport nodes, it is positive to see the application of this zoning to planned greenfield communities at Kinross Road and South East Thornlands.

However, the carry-over of the 'boutique' planning provisions of the Kinross Road and South East Thornlands structure plans will prevent flexible site-based development outcomes in the future and should be reconsidered.

#### ***Emerging community zone***

The new draft City Plan makes use of the 'emerging community' zone to identify and plan for future greenfield developments. Unlike the previous *2006 Redlands Planning Scheme*, which made use of 'investigation' zoning to clearly identify significant areas of potential future development, the 'emerging community' zone has been limited to a select few areas of proposed development.

Although new greenfield communities at Kinross Road, South East Thornlands, Double Jump Road and Victoria Point are recognised within the draft City Plan, the Redlands will require further residential development areas to meet future growth demands.

The Southern Redland Bay area, and the area bounded by Taylor Road, Woodlands Drive and Springacre Road have both been mentioned in the draft plan as potential sites for future urban growth. However, they have not been designated within the 'emerging community' zone.

The Property Council would welcome the inclusion of these potential growth areas within the emerging community zone. Ensuring all potential development areas are clearly

defined within the draft City Plan will guarantee that the community is provided a realistic picture of the local government area's future growth requirements.

### ***Retirement facilities***

The Property Council welcomes Redland City Council's efforts to meet growing demand for seniors' housing through the draft City Plan.

Recent research commissioned by the Property Council, and undertaken by RPS, found that by 2025 the demand for retirement living accommodation for people aged over 65 years is expected to double.<sup>2</sup> If the current rate of development continues there will be insufficient supply of retirement communities to meet expected demand.

To prevent the advent of a seniors' housing crisis the report has recommended that local governments provide greater flexibility in zoning, lower levels of assessment and reduce infrastructure charges. The draft City Plan has achieved progress towards this desired policy framework.

Under the draft plan, retirement living facilities will be code assessable on lots zoned with the new *low-medium density residential* zoning. Code assessable development will also be available within the Major, District, Local and Neighbourhood centre zones. In Principal Centre Zones, retirement living developments will be self-assessable.

However, within the *low density residential zone* retirement living developments will be impact assessable. Consideration should be given to further lowering the levels of assessment for retirement facilities to accurately represent the low impact of these developments and to better align with Council's policy to encourage liveable communities.

Beyond the scope of the draft plan, the Property Council congratulates Redland City Council on recognising the importance of encouraging retirement living developments through lower infrastructure charges. Redland City Council's current infrastructure charges framework provides significant incentives for these developments and reflects the true demand impact of these developments on local infrastructure networks.

## **4.2 Centre zones**

The Tables of Assessment in the draft City Plan outline arbitrary gross floor area thresholds which, when exceeded, trigger impact assessment for shops and shopping centres in the centre zones. These designations are unnecessary as centre growth is managed through the zoning designations. The Property Council would welcome the removal of the duplication of these requirements in the final City Plan.

The designation of both Toondah Harbour and Weinam Creek as Priority Development Areas (PDA) has removed these locations from the scope of the local planning scheme. The Property Council congratulates Redland City Council on its pursuit of PDA designation for these areas, which has allowed the streamlined assessment of

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<sup>2</sup> [\*The 5 A's of Retirement Living – towards, proactive planning\*](#), Aug 2015, RPS Australia East Pty Ltd

developments for these key sites and will allow the community to significantly benefit from new mixed use assets.

#### **4.3 Industry zones**

There is an undersupply of land zoned for industrial purposes within the draft City Plan. Although the draft plan carries forward existing industrial zonings, there has not been consideration of the need to identify further industrial growth opportunities. This is likely to limit future growth in the manufacturing, transport and warehouse sectors and work against Council's strategic intent of developing a robust local economy.

Consideration should be given to opportunities for further industrial zoning in the final Redland City Plan.



## 5. Overlays

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The Property Council congratulates Redland City Council on the significant streamlining of overlay mapping that has been undertaken in the development of the draft City plan.

### 5.1 Environmental Significance overlay

The draft Environmental Significance overlay is a considerable refinement from the 2006 Redland Planning Scheme. The research undertaken by Council to specifically identify areas of environmental significance has resulted in a more credible overlay. The improved delineation of environmental significance areas relies on specific site features rather than blanket coverage of particular zone types.

The refined Environmental Significance mapping will provide greater integrity to the planning scheme's protection of the regional ecosystem, which will in turn lead to better results for the region's vegetation, waterways and wetlands. The new refined mapping will also ensure that development is not unnecessarily caught up in onerous environmental assessment processes.

The Property Council welcomes new common sense provisions within the draft City Plan for native vegetation clearance thresholds. The introduction of an urban area clearance threshold of 500m<sup>2</sup> and a non-urban threshold of 2,500m<sup>2</sup> provides increased flexibility for developers to undertake minor site work without triggering the requirement of operational works applications.

### 5.2 Coastal Protection overlay

The draft Coastal Protection overlay reflects the revised Erosion Prone Area (EPA) mapping released by the State Government. The EPA is a theoretical map, and as such relies on many assumptions about the nature of the coastline (open coast, closed coast) and the waterways (rivers, creeks) it covers.

The stated purpose of the Coastal Protection overlay within the draft City Plan is to ensure development does not occur within erosion prone areas unless very specific criteria can be met. The result of this policy will be severe limitations on development opportunities throughout the Redlands in areas that may not be erosion prone, but have been inadvertently mapped as such.

Despite the theoretical and speculative nature of the EPA mapping, the onus falls on the landholder to undertake expensive technical assessments to disprove the mapping and subsequently request its amendment.

The State Government has committed to support the Moreton Bay Regional Council in producing a more accurate and region-specific EPA study. The Redlands City Council should pursue a similar commitment from the State Government to increase the precision of the EPA mapping and the Coastal Protection overlay.

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.

## 6. Infrastructure

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The Property Council welcomes Redland City Council's commitment to include a new Local Government Infrastructure Plan within their final City Plan. The integration of land-use and infrastructure planning is imperative to the coordinated achievement of local government planning objectives.

The development and adoption of a realistic infrastructure priority pipeline will encourage investment and ensure that industry can continue to provide greater housing options and community facilities in the Redlands.

Redland City Council's expected growth areas need to be adequately serviced through the new Local Government Infrastructure Plan. To provide certainty and consistency the infrastructure plan will also need to complement the State Government's impending South East Queensland Regional Plan and State Infrastructure Plan.

## 7. Conclusion

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The Property Council would like to again thank Council for the opportunity to provide feedback on the *Draft Redland City Council Planning Scheme 2015*.

If you have any further questions about the Property Council or the detail included in this submission, please contact me on [cmountford@propertycouncil.com.au](mailto:cmountford@propertycouncil.com.au) or 07 3225 3000.

Yours sincerely



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## 8. Contacts

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