

31st January 2020

Chief Executive Officer

City of Gold Coast Council

PO Box 5042. GCMC 9729

mail@goldcoast.qld.gov.au

CityPlanSubmissions@goldcoast.qld.gov.au

Gecko Environment Council Assoc. Inc. submission on Round 2 City Plan Amendments.

Theme and Item	Reference	Comment	Recommendation
Theme 1 Building Height overlay and new height categories.			
Item 1 & 2	Reduce building heights along Jefferson Lane in Palm Beach to respond to infrastructure constraints.	Gecko supports the reduction of heights along Jefferson Lane to enable some reduction in the amount of traffic along Jefferson Lane until such time as the City Plan can be changed to facilitate widening of the Lane. However we have concerns that potential developers in these 9 blocks will have 12 -18 months to apply for development at the current height under the superseded city plan arrangements and probably will do so to get higher yield on their investment. It is essential that approvals of development along the Lane do not add to issues of shadowing on the beach, wind tunnel and downwash as well as privacy. Jefferson Lane is currently operating as an access path to Palm Beach in the absence of an Oceanway path for walkers and bike users However there is no formalisation of a pathway along this narrow lane	That Council address with urgency the correction of the city plan needed to ensure that road widening can be enforced in Jefferson Lane and in other relevant streets throughout the Gold Coast. That Council undertake a safety audit of Jefferson Land in order to provide much improved safety for pedestrians and cyclists along the Lane.

		<p>leaving pedestrians and cyclists at risk of vehicle strike. There is a similar situation along Hedges Ave Mermaid Beach, but there separate lane marking and much reduce speed limits have provide some degree of safety for users. Gecko requests that Council urgently address this situation in advance of any success of being able to widen the Lane with resumptions of property.</p>	
	<p>Reduce building heights in the Currumbin neighbourhood centre zone to 12 metres to ensure built form remains complementary to the surrounding area</p>	<p>Gecko fully supports this reduction of height from 15m – 12m in the neighbourhood centre area to provide consistency along the beach front.</p> <p>It is possible that potential developers will seek more than 3 or 4 storeys under the superseded plan arrangements and Council should resist such requests.</p> <p>Gecko requests that Council undertake to return a Local Area Plan or equivalent to Currumbin to ensure its unique and traditional features are retained and that this area, which is the beginning of a critical biodiversity corridor into the hinterland, is more adequately protected. Currumbin, like the Targeted Growth Area, would benefit from a Neighbourhood Elements overlay and the imposition of the design principles in the Site Context and Urban Design policy</p>	<p>That Council adopt a height of 12 m for the neighbourhood centre area of Currumbin Beach.</p> <p>That Council undertake to return a Local Area Plan or equivalent to Currumbin Beach as soon as possible.</p>
	<p>Modify the Strategic framework to emphasise that the future Light Rail corridor (from Broadbeach to Coolangatta) cannot be used to justify increased heights and densities until appropriate investigations have been done</p>	<p>Gecko supports this modification in the hope that a repetition of the excessive relaxations of height and density etc in Palm Beach do not occur along the remainder of the Gold Coast Highway. Some clarification of what the “appropriate investigations” are, would be useful and improve the transparency of the whole Light Rail Urban Renewal Overlay (LRURO). It is not clear how Council intends to enforce this “rule” especially when Code assessment is not required to refer to the Strategic Framework. The anger and anxiety about a repeat of the Palm Beach development relaxations is high in these communities.</p> <p>Clear statements of what LRUR actually will look like along the remainder of the route to Gold Coast airport would increase transparency and improve community confidence.</p>	<p>That Council adopt this modification to the Strategic framework and provide additional information to the community about the Light Rail Urban Renewal.</p>
	<p>Improve administration definitions for all building height categories to link the Building height overlay map to the Strategic intent while ensuring the categories are</p>	<p>Gecko supports this improvement to increase understanding in the community of the building height categories.</p> <p>Council planning staff must be instructed not to enable or allow unjustified applications for heights over those specified in the Building Height Overlay. Gecko would like to see this amendment amplified to remove the 50% height exceedance allowance altogether throughout</p>	<p>That Council adopt this improvement to administrative definitions for all building height categories.</p> <p>That Council bring forward an amendment to remove the 50% height allowance throughout the City.</p>

	not used to justify greater heights in development applications.	the City. There is not much point in having a height overlay map if it is constantly ignored. Any additional height allowance should not be more than 10%.	
Item 3	Introduce provisions in the Multiple accommodation code to support an 800m2 minimum lot size for Multiple dwellings greater than 12 metres in height in the Low-medium density residential	Gecko supports this change as a means of ensuring some degree balance in development of multiple dwellings, though it needs to be accompanied with the requirement of reasonable setbacks. Given the increasing issue of rising temperatures it is important that there is reasonable space around and between buildings to allow for cooling airflow, particularly in suburbs in the north and west of the city away from sea breezes. This amendment may help with this.	That Council adopt this change for L- M density residential areas in conjunction with adherence to reasonable setbacks..
	Introduce a new provision in the Low-medium density residential zone to regulate roof form to ensure the intended three storey height can be achieved	Diversity of roof form can add interest to the look of the built environment and Gecko supports this, though we are unsure about how it can be enforced. Some consideration of facilitating the placement of solar panels or vertical wind turbines on medium and high density buildings is also needed. Other consideration could be the inclusion of roof terraces with gardens or greenery to add to places for residents/ tenants to enjoy the outdoors.	That Council take into consideration roof forms that can accommodate solar panels and/ or small vertical wind turbines on medium density buildings.
Theme 2 Built Form and Urban Design			
Item 9 Built form improvements	Modify the content and layout of the Site Context and Urban Design Policy (SC&UD) and the relevant zone code provisions that relate to urban context.	Gecko notes that these design changes do not include reference to climate change mitigation or adaptation despite the reference in the Planning Act 2016, Purposes of the Act (iv) accounting for potential adverse impacts of development on climate change, and seeking to address the impacts through sustainable development (sustainable settlement patterns or sustainable urban design, for example). (https://www.legislation.qld.gov.au/view/whole/html/inforce/current/act-2016-025) Further in the Benefits of the new planning system it is stated “ The impacts of climate change must be considered in all development proposals. ” (https://planning.dsdmip.qld.gov.au/planning/our-planning-system/new-system-benefits) It is our understanding that this requirement is mandatory as articulated in Part 5 Advancing purpose of Act (j) avoiding, if practicable, or otherwise minimising the adverse	<ol style="list-style-type: none"> 1. That Council include the requirement that all developments address potential adverse impacts of climate change through sustainable development as per the Planning Act 2016. 2. That Council adopt these changes to improve the design of buildings within a suburban context and improve separation and airflow. Further that Council undertake to mandate these changes so that they are enforceable. 3. That Council establish an independent expert design

		<p>environmental effects of development (climate change, urban congestion or declining human health, for example). and yet it does not appear to be adhered to in the City Plan. The impact of climate change has been clearly demonstrated over this summer, in the preceding years with the long drought and 2019 is recorded as the hottest year on record. Australia appears to be at the forefront of impact of climate change on people and it is imperative that consideration for rising temperatures and resilience to extreme weather events is now factored into the built environment. Gold Coast City also has a responsibility to play its part in reducing greenhouse gas emissions through building construction methods and other planning factors. Gold Coast has made some progress on adaptation to seal level rise, but does not appear to be responding to issues of heat stress or other extreme weather events. A business as usual is no longer acceptable as it is the owners and residents of the built environment who will have to cope with these, not the developer of the product. It must be remembered that our city is known to be one of the most vulnerable in Australia to the impacts of climate change.</p> <p>It is hoped that these changes in SC & UD will improve not only the sustainable design of individual buildings, but also the general areas around a building with wider spaces between buildings. It is important that developers recognise that their particular development adds to or detracts from the general ambience and character of an area or suburb. The separation of buildings is important for privacy reasons as well as airflow. Gecko has considerable concern that these changes are policy only and are not mandated in the City Plan to improve the liveability of the built environment. Given that in the feedback comments made, there appears to be some resistance from the development industry about these changes and we have concerns that they will not be adhered to or that planning staff might be pressured not to insist on them, especially as they do not have specific or specialised training in these areas. It is understood that Sunshine Coast Council planning staff use a Design Strategy Book as well as an independent expert panel to assist planning staff and we recommend a similar approach by Gold Coast Council.</p>	<p>panel and a design strategy book to assist with this assessment and compliance with the design principles.</p>
--	--	---	---

		On another point it is important however that attention is paid to the possible creation of wind tunnels and ensure that these are avoided as they make ground areas unpleasant to use.	
	Modify the setback provisions in the High density residential zone code and the Light rail urban renewal overlay code.	Gecko does not support the reduced setbacks in the High density zone code, minor though the reductions are. If the building is not viable on that site then the developer will have to amalgamate two or more sites as was the practice previously. There have been too many buildings approved with excessively reduced setbacks with no real justification except increased yield. Set backs are important to airflow and privacy and to enable adequate landscaping as well as enhancing the community amenity.	That Council retain the setbacks and do not reduce them.
	Introduce a tower base height for development outside the Light rail urban renewal overlay area in the Strategic framework.	Gecko strongly opposes this amendment as we can see no reason to have any tower bases at all in areas outside of the Light Rail urban renewal overlay (LRURO) or even in it and Council has not provided any justification for this change. Tower base parking is a relatively new construction as can clearly be seen in the older parts of the city where all car parking was underground. We recognise that above ground parking is cheaper for the developer, but it is creating an ugly streetscape and certainly does not comply with the 6 design principles in SC & UD. Even a height of 5 metres is intrusive and potentially ugly and all developments should have basement car parking or parking at grade.	That Council does not adopt this amendment and instead requires all areas outside of the LRURO area to have basement car parks or parking at grade.
	Introduce 'deep planting' provisions for the Low-medium density residential zone code, Medium density residential zone code, High density residential zone code and Light Rail urban renewal overlay code.	Gecko strongly supports these deep planting provisions for these three zones as a method of increasing the attractiveness of buildings at ground level as well as to provide shade and moderate the local climate. Gecko requests that further consideration be given to increasing the percentages of area for deep planting as they are very low at 10% for buildings over 33m. Trees generally survive and thrive better in groups rather than being isolated and the extra area would allow for this. There is no indication in the information provided as to whether an arborist's opinion was sought before determining the amount of land required for viable deep planting.	That Council adopts this amendment, but considers increasing the percentage of area required for deep planting for buildings over 33m That Council seeks the advice of a qualified arborist on the suitability of the percentages and 3m width for deep planting.
Item 11 Existing light rail urban renewal area overlay review			

	<p>Revise the Light rail urban renewal overlay code content and structure to improve its useability, remove any unnecessary duplication with the underlying zone code provisions and modify provisions to improve alignment with other parts of the City Plan</p>	<p>This amendment is quite obtuse. Does it relate only to the Targeted Growth Area or the whole length of the Light Rail? There is still a great deal of confusion in the community about what urban renewal actually means in Stages 3A and 3B. It appears to Gecko members to be a way of justifying increased density in order to make the light rail financially viable. In other words, the company Goldling appears to be the beneficiary of plans to increase density considerably along the light rail route and in opposition to the wishes of the community. Many of the developments in Palm Beach have been given excessive relaxations in height, density and setbacks on the basis of being a future light rail route. The result is an aesthetically displeasing conglomeration of high rise buildings that have no relationship to the context of Palm Beach as a suburb and overwhelm the streetscape of the Gold Coast Highway and neighbouring streets. The suggestion that such relaxations cannot be justified in the future in relation to the LRURO for southern suburbs does not give the community much confidence given the history of overriding the City Plan requirements in the past. In terms of Stage 3B it should be recognised that increased density is not necessary as the light rail will have an almost captive passenger load from people arriving at the GC airport. Further, there are height limits due to the flight paths of aircraft approaching the airport. It appears unlikely that Council will abandon the light rail between Broadbeach and the Airport despite such a move clearly being the wish of many in the community. Alternative transports methods of electric articulated buses or trackless trams should be investigated to save ratepayers money and reduce the necessity of increased density of development to justify the cost.</p>	<p>That Council adopt this amendment as long as the design principles are adhered to, including deep planting opportunities in Primary, Secondary and Frame areas as well as Transition areas to improve the liveability and ambience of suburbs.</p>
	<p>Modify the Light rail urban renewal overlay map to specifically reference the 'maximum' height of tower bases in relevant focus areas.</p>	<p>Again this appears to be an administrative change and it fails to recognise the community antipathy to tower bases for parking, regardless of where they are in the city. All parking for high and medium rise development in the past was in the basement so it was not an eyesore. It has never been explained to the community why they have to put up with ugly intrusive tower bases for parking. The only reason can be that it saves money for the developer, again at the expense of community amenity and liveability. The practice should be stopped and the City Plan return to the previous requirement of basement parking. If Council intends to have a high quality and</p>	<p>That Council modify the light rail urban renewal overlay map to remove allowing any tower bases that are for parking and instead revert back to the previous practice of basement or at grade parking.</p>

		attractive city scape in the built environment they should enforce basement car parking.	
Item 14 Driveways and vehicle crossings update	Provide an additional option for a non-standard driveway design to be certified by a Registered Professional Engineer of Queensland (RPEQ) and reduce impacts on the higher order road network.	Gecko does not have any expertise in this area and will not comment as a result.	No recommendation
	Improve separation distances for developments proposing more than one driveway and vehicle crossing (e.g. a dual occupancy)	Gecko does not have any expertise in this area and will not comment as a result.	No recommendation
	Include a new provision for sites that front roads identified on the Functional road hierarchy and with two or more road frontages, to have their vehicle access from the road with the least on-road traffic	Gecko does not have any expertise in this area and will not comment as a result.	No recommendation
Theme 3 Targeted Growth Areas			
Item 15 Identified Growth Areas	Reinstate the Low density residential zone in certain parts of Labrador.	Gecko supports this amendment if it retains the character of that particular area of Labrador.	That Council adopt this amendment.
	Refine to zoning, building height and residential density in certain locations within Biggera Waters (including parts of Runaway Bay), Labrador and Southport West. The proposed refinements	While Gecko supports this amendment which recognises that local neighbourhood qualities are important to residents and should be retained. However we question why this is now being applied only to these TGA suburbs, but the principles behind these changes have been totally ignored in Palm Beach. It appears to our members to be a political decision rather than a genuine response to the needs of the residents. The residents of Palm Beach and elsewhere have been persistent in their complaints that Council has permitted high rise development in	That Council adopt this amendment, but ensures that all areas of the Gold Coast are afforded the same consideration of neighbourhood qualities when assessing developments.

	respond to the local neighbourhood qualities raised by the community, which were considered through the identification of individual sub areas within each targeted growth area	Palm Beach with excessive relaxations of height, density, setbacks, parking and communal space, without any regard to the neighbourhood qualities. Neither has Council made any effort over the past few years to engage an expert consultant on these matters as was done for the TGA. This is blatant inequity and totally unacceptable and Palm Beach is left with a legacy of an ugly main thoroughfare with most buildings lacking any architectural merit.	
	Introduce a new Neighbourhood elements overlay to more closely manage future growth and to assist in creating attractive, leafy and great neighbourhoods of the future.	It is surely the ambition of all Gold Coast residents to have “attractive, leafy and great neighbourhoods of the future”, but it appears that only those in the TGA will be so blessed. A comment was made at the Currumbin Town Hall meeting on 21 st January that Council needed to trial some landscaping studies in the TGA which will lead to the “attractive, leafy, great neighbourhoods of the future”. We trust that this trial is undertaken rapidly so that the same opportunities can apply to other suburbs throughout the city. The new Neighbourhood elements overlay should be applied to all residential areas of the Gold Coast. If Council can suddenly come up with this overlay in response to the anger of the residents of Labrador, Biggera Waters and West Southport at being chosen as a TGA, then they should be equally able to apply it to all residential areas. Gecko supports the amendment.	That Council adopt the amendment, but clearly signal a commitment to applying the new Neighbourhood elements overlay to other residential areas of the city.
	Remove Southport West from the Light rail urban renewal overlay map, to avoid duplication with the new Neighbourhood elements overlay.	If there is a conflict with two sections of the City plan as a result of the institution of the neighbourhood elements overlay, then the light rail overlay should be removed.	That Council adopt this amendment
	Introduce a ‘traditional residential area’ for a certain part of Southport West, as part of the Neighbourhood elements overlay, acknowledging the predominant architectural style in that area which is to be protected.	Gecko supports efforts to retain specific architectural styles of parts of the city as a way of retaining character and history. The Gold Coast is a relatively new city and has unfortunately been quick to remove many of its historical land marks, which give a city a presence and ambience. Again we request that this change as a result of the new Neighbourhood elements overlay is applied readily to other relevant parts of the city with traditional architectural styles or historical features. A return to the Local Area Plan arrangements of the previous plan would assist in sustaining individual character of suburbs and improve residents’ pride in their city.	That Council adopts this amendment and ensures that it is applied to other relevant areas of the city with equally traditional residential areas.

<p>Item 16 Urban Expansion Upper Coomera Investigation Area</p>	<p>Add a new overall outcome for Multiple dwelling development in Courtney West and Courtney South-east to provide better planning guidance for delivery of multiple dwellings</p>	<p>Gecko again raises the issue of bush fire risk for the area of Courtney Rd West, where the development intrudes into the forested hills. The example of inappropriate development in fire prone areas and the tragic outcomes has been clearly demonstrated with recent fires impacting communities adjacent to forested areas in Queensland, NSW, Victoria and South Australia.</p> <p>We strongly believe that there should not be any development in this CW section of the overall development and that it is a dereliction of duty of care to approve this change. Council seems to be ignoring its own statement namely Part 2 Attachment Q Part 6 6.2.16 f ii (c) which states “ High risk natural hazard areas are not developed or are sensitively developed”</p> <p>It is also a failure of duty of care to expect the body corporate of this section CW to manage the bush fire risk aspect of this proposed development.</p>	<p>That Council again examine the bush fire risk of the development in Courtney Rd West, Upper Coomera and removes this proposed development CW from the overall area for development.</p>
	<p>Amend the Strategic Framework and the Zone code are proposed to clarify that the water courses, their buffers and other matters of environmental significance are required to be restored and enhanced.</p>	<p>Gecko supports this change to ensure that the developers and the body corporates in this proposed development carry out their duty to enhance and protect the natural environment that is an important component of this emerging community.</p> <p>Again we suggest that the City Plan be amended to increase the width of riparian zones to a minimum of 50 metres.</p>	<p>That Council adopts this change to improve the protection of the natural environment in the Upper Coomera emerging community.</p> <p>That Council amend the City Plan to increase the width of riparian zones to a minimum of 50m.</p>
	<p>Remove a note that contemplated increased densities where sites are amalgamated, as this does not align with the Overall Outcomes.</p>	<p>Gecko supports this change so that densities are appropriate to the overall outcomes for this proposed development.</p>	<p>That Council adopts this change to ensure densities are relevant to the overall outcomes.</p>
<p>Theme 4 Growth and Diversification of employment</p>			
<p>Item 20 Neighbourhood Centre improvements</p>			

	Modify the Chevron Island Late night dining sub-precinct to include the properties at 7-9 Burra Street, Chevron Island	Gecko is not familiar with this site, but the mapping indicates that it is a minor amendment.	That Council adopt this change.
	Remove the proposed Late night dining precinct from the neighbourhood centre at Pacific Parade, Currumbin, meaning hours of operation are envisaged to cease at 10pm (consistent with the current City Plan).	Gecko fully supports this change as being consistent with the neighbourhood amenity and current city plan. This is a mainly quiet residential area which should not be impacted by late night diners leaving the area or the noise of the restaurant etc itself.	That Council adopt this changed amendment
	Amend the catchment size for suburban neighbourhoods to a 1500 metre walk.	This appears to be a sensible change and consistent with most people's ability to access a neighbourhood centre.	That Council adopt this changed amendment.
Theme 5 Environmental Mapping			
Item 22 Environmental mapping	Update the Environmental significance – vegetation management overlay map to incorporate more up-to-date State Government mapping and local vegetation data (i.e. 2017 data compared to 2013 data)	Gecko supports the updating of vegetation mapping on a regular basis to more accurately reflect the real situation of vegetation on the Gold Coast with such rapid development. It is hoped the final Koala Conservation Strategy mapping will be incorporated into the Council mapping as soon as possible.	That Council adopts these changes to vegetation mapping and incorporates Koala Conservation Mapping when finalised, as soon as possible.
	Amend the Critical corridor mapping within the Environmental significance - biodiversity areas overlay map to include vegetation located within road casements (road reserves) and waterway casements where required to maintain	Gecko supports the updating of vegetation and biodiversity mapping on a regular basis to more accurately reflect the real situation of vegetation on the Gold Coast with such rapid development. It is hoped the final Koala Conservation Strategy mapping will be incorporated into the Council mapping as soon as possible. Gecko also supports the inclusion of vegetation in road and waterway reserves that may have significant biodiversity values.	That Council adopt these changes to biodiversity mapping and incorporates Koala Conservation Mapping when finalised, as soon as possible.

	connectivity and include significant biodiversity values		
	Address site specific requests for inclusion or removal from the Biodiversity area mapping.	Without knowing what the specific sites are that are referred to here in this item Gecko is unable to comment other than to express concern that there could be a potential erosion of biodiversity values in an area through a number of applications for removal. The criteria for consideration of such a request need to be specified.	Specify criteria for site specific requests.
Item 23 Rural and rural residential landscape and environment landscape	Amend the Landscape and environmental precinct mapping in both the Rural and Rural residential zones to reflect more up to-date vegetation data.	Gecko supports regular updating of mapping to reflect the environmental values of vegetation and biodiversity. Gecko would expect that the final Koala Conservation Strategy mapping will be included in this update.	That Council adopt this changed amendment and ensures that the final mapping for the Koala Conservation Strategy is included in a timely manner.
Theme 6: Other land use changes and alignment improvements			
Item 26 Community infrastructure interface areas	Include waste recycling and waste transfer stations in the ICIALIA overlay code, resulting in a 250m buffer area	This is a sensible amendment to protect essential community facilities from encroachment of development. It is not clear if any compensation is likely for properties that might lose value in this situation	That Council adopt this changed amendment to protect essential community facilities.

Yours sincerely



Lois Levy

Campaign Coordinator
 Gecko Environment Council Assoc. Inc.
advocate@gecko.org.au

0412 724 222