

Submitter's full name (print):

Residential address (print):

.....

.....

Organisation (if applicable)

Email address (print):

Contact phone number:

Date: 16 October 2019

To: Mr Dale Dickson

Chief Executive Officer City of Gold Coast

PO Box 5042, Gold Coast MC QLD 9726

Email: CityPlanSubmissions@goldcoast.qld.gov.au

Subject: Submission to Our City Our Plan (Major Updates 2 and 3)

This submission documents my comments on the draft *Our City Our Plan (Major Updates 2 and 3)* and is made as part of the community consultation process closing on 11 November 2019.

Theme 1: Height and Density

Issue	Grounds and recommendations
<p>Apartment building applications are being approved which do not follow the guidelines of the City Plan, particularly in regard to:</p> <ul style="list-style-type: none">• Density• Height,• Setbacks• Site cover• Communal space• Insufficient on-site car parking.	<p><u>Grounds</u></p> <p>These excessive relaxations of Acceptable Outcomes result in a situation where the intensity of the buildings for site cover and density are not aligned with the Strategic Intent of the Built Form and Urban Design provisions of the City Plan. It completely undermines community confidence in the operation and good governance of the development assessment and approval process e.g. the current cohort of Palm Beach apartment buildings being constructed with excessive relaxations. These problems are only partly addressed in the proposed Updates. They are of such significance that further strengthening of the amendments is needed to resolve the matter. <u>Recommendations:</u> It is recommended that provisions be added to ensure that when the development applicant seeks to go beyond the Acceptable Outcome for density, site cover or setbacks the assessment must be impact assessable. This will ensure the community is afforded the opportunity for input and right of appeal..</p>

Issue	Grounds and recommendations
<p>Specific comments: Items 1 and 2 7 categories of height compared to the current 3 categories</p> <p>Height trigger for impact assessment</p> <p>Colour coded height maps</p> <p>Retention of 50% bonus height</p> <p>Light rail urban renewal overlay as well as excessive relaxations of density, setbacks, carparks and communal space</p> <p>Specific comments: Item 3</p> <p>Height of buildings in metres not storeys</p> <p>Introduction of low-medium residential density</p>	<p>(1 & 2) Overall this is supported to give additional clarity to the community in understanding the height of buildings that could be constructed in their area. Some visual representation showing heights in storeys and meters in the plan would be beneficial.</p> <p>(1 & 2) Height as the only trigger for impact assessment (other than land uses) has resulted in a very high level of code assessment approvals (98%) resulting in the community being marginalised in the assessment process and excluded from third party appeal rights.<u>Recommendation:</u> Return the provision of plot ratio as a limit on excessive floor space and site yield.</p> <p>(1 & 2) The colour coding and metres of heights on maps is commended as an improvement of clarity to residents of what can be expected in their area.</p> <p>(1 & 2) This is strongly opposed as it has clearly been abused in the recent past. If the City Plan sets heights suitable for specific areas of the city then the developers should adhere to that height, otherwise the community has no certainty knowing what can be built in their neighbourhood. <u>Recommendation:</u> Remove the 50% height bonus from the City Plan altogether.</p> <p>(1 & 2) The abuse of the 50% height bonus and/or the excessive relaxations of density, setbacks, carparks and communal space has been clearly demonstrated in areas along the proposed light rail renewal overlay in Palm Beach and Broadbeach, which has resulted in changes to visual and social amenity of these areas, loss of sea breezes, and congested car parking in side streets with no community benefit. <u>Recommendation:</u> That the city plan guidelines are made more prescriptive (regarding shadowing, building proportions, site cover, communal open space and minimum provision of deep planting) and are adhered to much more strictly in future approvals.</p> <p>(3) Describing building heights in terms of metres not storeys will confuse the public and encourage minimal ceiling height buildings that are unadaptable to other future uses.<u>Recommendation:</u> that both metres and storeys is retained to ensure that sustainable, long life loose fit buildings with a generous street level storey height and the opportunity for an articulated (non-flat) roof form can be achieved.</p> <p>(3) The addition of low-medium residential zone is a positive step to providing a greater range of housing options to meet the growth projections of the SEQRP, such as duplex, townhouses, lower rise apartments.<u>Recommendation:</u> More information should be provided in the City Plan in a visual form to demonstrate the desired scale and built form outcomes as well as revised car parking requirements since this zone is to accommodate families</p>
<p>Theme 2: Built form and urban design</p>	

Issue	Grounds and recommendations
<p>Throughout the city there are many examples of bulky, unattractive apartment buildings with tall podiums being constructed with tiny setbacks that result in very little or no landscaping at street level. The interaction between the buildings and the street needs to be vastly improved.</p>	<p>Urban renewal is vital to accommodate the growth of the City, but it must be of high quality. The City Plan Updates place emphasis on protecting the iconic skyline. However, a similar emphasis needs to be evident to protect our streetscapes, the very medium through which most residents and visitors experience the City. The cumulative effect of such developments is the creation of concrete canyon streetscapes with poor airflow, poor visual amenity and elevated air temperatures from the unshaded ‘heat island’ effect. <u>Recommendations:</u> This problem is partly addressed in the proposed amendments. Updates to the City Plan should require <u>all</u> apartment building approvals to provide for spacious areas of attractive landscaping at street level. Minimise or eliminate above ground car park podiums. Provide wide separation distances to adjacent towers to allow for adequate airflow and views. It is understood that a minimum separation of 25m is a reasonable standard. Any proposal for relaxation of setbacks or site cover exceeding a specified percentage of the prescribed setback stated in the Acceptable Outcomes should trigger Impact Assessment. Conditions be applied obliging minimum of 10% of site area to deep planting (not on slabs) at street level. Cessation of the practice of approving tall, skinny buildings on small suburban housing blocks with tiny setbacks.</p>
<p>The construction of basement car parks for apartment buildings is causing excessive damage to adjacent properties.</p>	<p>Construction sites requiring excavation for underground parking can potentially damage adjacent properties. Many examples have occurred in the Palm Beach area.</p> <p>Risk of damage is highest where the method known as vibrating sheet metal piling is used. This risk can be substantially reduced by Council imposing more stringent conditions on development approvals.</p> <p>Dewatering of basements during construction has resulted in subsidence of some adjacent properties. Adjacent property owners should have better protection from the avoidable impacts of poorly managed dewatering.</p> <p><u>Recommendations</u></p> <p>Council imposes more stringent conditions on all apartment building development approvals that require less damaging methods of basement excavation and construction e.g. the use of secant piling.</p> <p>In all cases, Council development approvals should require developers to provide, in a timely fashion, adjacent property owners with:</p> <ol style="list-style-type: none"> 1. An independent third party-prepared dilapidation report. 2. A safe work statement detailing measures to monitor stability/integrity of surrounding buildings. 3. A copy of dewatering plan measures that address geo-technical issues, such as subsidence. 4. A noise and dust management plan to reduce potential environmental and health hazards during construction, <p>Council should require provision of an adequate bond by the developer and/or the construction company, to be held in trust, to cover necessary repair and rehabilitation of damage resulting from construction.</p>
<p><u>Specific comments: Item 8</u> Removal of community benefit bonus.</p> <p><u>Specific comments: Item 9</u></p>	<p>(8) This removal is opposed and the reason given for its removal, that it was rarely used is spurious. It was rarely used because developers have been successful in gaining higher than the specified densities without having to return anything to the community. <u>Recommendation:</u> That the community benefit bonus be retained and used to provide much needed benefits to the community including improvements in ESD /green buildings beyond 6-star ratings; provision of parks especially in buildings that reduce their communal open space; and monetary contribution to local community facilities.</p> <p>(9) This, and the SCUD Site Context and Urban Design Policy are commended as one way of improving the liveability of buildings</p>

Issue	Grounds and recommendations
<p>Specific comments: Item 12 Transport code changes</p>	<p>transport in the northern growth corridor; safe off road bikeways throughout the city and shaded walkways to cope with rising temperatures and health impacts</p>
<p>Theme 4:Growth and diversification of employment</p>	
<p>Specific commentsItem 18 Reduce industrial land use from Impact to code assessment to facilitate investment</p> <p>Specific comment Item 20 An alternate measure to calculate the size of a neighbourhood centre in low residential areas. Extended trading hours.</p>	<p>(18) This change is opposed as once again it locks resident out of the assessment process with no ability to make formal objections or possible legal challenges to approvals. It is considered unlikely that moving from code to impact assessment will greatly enhance the likelihood of investment. <u>Recommendation:</u> Retain impact assessment mode for all industrial land use applications.</p> <p>(20) There is no information provided to tell residents what this alternate measure is? <u>Recommendation:</u> That a clear description of the alternate measure is provided.</p> <p>(20) The extension of trading hours in neighbourhood areas should not be a blanket extension <u>Recommendation:</u> It should be considered on a case by case basis and by being impact assessment provide residents likely to be impacted by noise or nuisance the right to lodge objections.</p>
<p>Theme 5: Environment</p>	
<p>Specific comment Item 22Environmental significance vegetation</p> <p>Specific comment Item 22Environmental significance biodiversity</p>	<p>(22) The Council is to be commended for the improved mapping even though it does not yet include the koala conservation strategy mapping to bring it up to date. However, such mapping, with the exception of identifying high priority vegetation, does not actually increase the protection of native vegetation in local areas since it is a whole of city perspective. <u>Recommendation:</u> That measures be developed to strengthen the protection of all categories of native vegetation such that it cannot be removed easily.</p> <p>(22) While it is an improvement to have these areas properly mapped it does not appear to actually improve their protection. There is a need to improve both the quality and quantity of environmental impact assessment processes. <u>Recommendation:</u> That measures are developed or strengthened that better protect native flora and fauna species from both degrading on-site and off-site impacts. E.g. improved erosion controls; wider riparian zones; increased connectivity of vegetated areas; cessation of total tree removal on subdivisions. Longer and seasonal periods of environmental assessments for development</p>

Issue	Grounds and recommendations
<p data-bbox="147 363 539 419"><u>Specific comment Item 22</u> Hinterland to coast critical corridor</p> <p data-bbox="147 627 439 683"><u>Specific comment Item 24</u> Healthy waters code</p>	<p data-bbox="618 236 2040 456">applications. While there is a net increase in the corridor areas in the city, this is uncertain due to potential conflict between the proposed mapping (from 2016)with the latest State Mapping from 2019, as clearing for development since 2016 has not been included. It is regrettable that biodiversity may be lost through the loss of corridor area in Burleigh, Currumbin, Tugun. Helensvale, Pacific Pines and Oxenford. The development codes have not been strengthened to limit development impacts and is unclear whether planners will approve relaxations to development applications or if there will be a strict adherence to delivery of offsets that will now be required for removal of Medium Priority Vegetation.</p> <p data-bbox="618 464 1995 520"><u>Recommendation:</u>Recommendation that the note at 9.4.14 is amended to require, not merely recommend, a spotter catcher is present so that clearing of native vegetation does not harm wildlife. This should be a Performance Outcome.</p> <p data-bbox="618 528 2040 616">(24) The proposed changes in the code are supported as methods of better protecting waterways especially in regard to sedimentation controls. There is a need for wider riparian vegetation corridors to improve this and enhance biodiversity protection and connectivity.</p> <p data-bbox="618 624 2063 679"><u>Recommendation:</u> That these changes are supported and that riparian widths are reviewed with a view to making them wider with a minimum of 50 m wide.</p>
<p data-bbox="147 759 584 791">Theme 6:Other land use changes</p>	
<p data-bbox="147 799 584 919"><u>Specific comment Item 29</u> Retirement facilities. Change assessment from impact assessment to code assessment.</p>	<p data-bbox="618 799 2051 951">Changing assessment of aged care facilities from impact assessment to code assessment is strongly opposed. There have been instances of development of a residential facility with a minimum of aged care facilities (less than 1/4 of the units) on a golf course (Burleigh Heads) and excessive relaxations in other applications. While it is desirable to allow people to age within their communities where they have friends and supports it is also essential that existing residents have the right of objection to proposed aged care developments.</p> <p data-bbox="618 959 1536 983"><u>Recommendation:</u>Retain the assessment of aged care facilities as impact assessment.</p>

Additional comments:

Signed: