



Australian
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City of
Gold Coast

Draft City Plan 2015 Review

Submission to

City of Gold Coast
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City of Gold Coast
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SUBMISSION BY

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PURPOSE

- This submission is made by the Qld Chapter of the Australian Institute of Architects (the Institute) to the City of Gold Coast in response to the Draft City Plan 2015 – Review.
- This submission has been prepared by the Queensland Chapter of the Australian Institute of Architects.
- At the time of this submission the Office Bearers of the Qld Chapter are:
Richard Kirk (Chapter President)

INFORMATION

Who is making this submission?

- The Australian Institute of Architects (the Institute) is an independent voluntary subscription-based member organization with approximately 12,305 members, of which 6,840 are architect members. Members are bound by a Code of Conduct and Disciplinary Procedures.
- The Institute, incorporated in 1929, is one of the 96 member associations of the International Union of Architects (UIA) and is represented on the International Practice Commission.

Where does the Institute rank as a professional association?

- At approximately 12,305 members, the Institute represents the largest group of non-engineer design professionals in Australia.

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INTRODUCTION

The architectural fraternity of the Gold Coast and Northern Rivers commend Gold Coast City Council for its considerable ambition and aspirations contained within the high order initiatives of the Draft City Plan. We also appreciate and respect the considerable effort Council has invested in compiling the critical document.

In the spirit of collaboration and sharing Gold Coast City Council's stated goal of carrying the Gold Coast as into the future as an emerging and vibrant world city we offer our comment and suggestions on elements of the Draft City Plan.

We greatly appreciate the time and effort taken by Gold Coast City Council to consult with the professional and community and to allow input into this important document for the City's future.

We understand the intention is to provide further updates to the Draft City Plan and we would strongly urge Council to consider direct engagement with the Architectural profession on the Gold Coast to discuss, test and hypothesise future elements of the City Plan in order to achieve the aspirations of the City and its residents into the future.

This submission has been prepared as a response to the Gold Coast City Council's Draft City Plan Document with the collaborative input of a number of Architects from the Gold Coast Northern rivers Region membership.

Participating Architects represent a broad cross section of Architects many of whom have been instrumental in the built form of our city over the past fifty years through to emerging practitioners as well as academic representatives from both of our Architecture Schools. Several participants have worked in both local and State government, many work in private practice. All live within the City of Gold Coast.

- As architects living and working within the City we are uniquely placed to implement the initiatives and objectives of the City Plan in built and urban form across our City.
- Gold Coast Northern Rivers members of the Australian Institute of Architects are willing and available to provide Council with insightful and specific input on many areas of the City Plan as it relates to built form, urban design, assessment and strategic intent.
- We encourage Council to approach local architects to work collaboratively with Planners and Urban designers to review current zoning maps to "inspire" liveable places/living with nature; to provide exemplary built form to further illustrate Council's objectives for specific built typologies and to assist in the development of appropriate guidelines and codes to assist Council in illustrating Strategic Intents

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- With two schools of Architecture on the coast we have a unique opportunity to test innovative ideas within our city the will allow the Gold Coast to meet the challenges of population growth and urban renewal that will define the coming decades
 - For reference, local AIA members and Griffith University School of Architecture are keen to initiate, support and convene an EBD (Enquiry By Design) workshop looking at GC Futures.
 - The exact extent and nature of the workshop needs further consideration. Suggest early in 2015 (late Feb early March). It would be desirable to have Council to be a partner/participant in this activity, though it should be emphasised that the agenda/scope would be established, in consideration, but independently of their input so as not to constrain the potential discussion points.
 - The aim would be to provide a design voice and input for future iterations of the City Plan including Amendment 1 and beyond.

1.0 GENERAL COMMENTS

- In many instances throughout the City Plan there is a tendency to revert to a very specific prescriptive framework. This often diminishes the potential for site/locality specific outcomes that may vary from a 'one size fits all' approach for sites across the City. This also discourages alternative and potentially better solutions as there is a natural tendency to default to the prescriptive solution as outcomes are perceived as more certain.
- The Plot Ratio provisions appear to have been deleted from the draft City Plan, with greater emphasis on Density per site. This potentially discourages amalgamation of sites to create larger projects that have previously facilitated urban nodes such as Oracle in Broadbeach. Plot ratio provisions have previously allowed the City to develop tall, slender building form.
- Emerging lack of sites of sufficient scale to become urban nodes will greatly influence the next phase of the City's development. This potentially will result in built form at the 6-10 storey scale rather than high rise. This places greater responsibility on the City to monitor and encourage innovative and exemplary outcomes in built form at this scale.
- Returns / bonuses for better design outcomes need to be substantial to encourage take up and enable these clauses within the scheme to fulfil broader City objectives.
- This mechanism could be used to achieve city wide objectives of diversity in uses, amenity, built form and affordability
- International cities such as Singapore utilise incentives rather than restrictions or prescriptive means to encourage better urban design and built form outcomes. Innovation is rewarded through bonuses rather than limits.
- PIP charges potentially discourage a move to higher densities, particularly in suburbs that would be well suited to infill housing as a means of increasing densities.
- The Southport PDA has been an example of a less prescriptive approach to planning controls. Perhaps not coincidentally, there is currently a proliferation of projects in this area. Allowing the current model of the Southport PDA to continue to evolve would provide a better understanding of how this approach could be applied elsewhere in the City to encourage development.
- City Plan places much emphasis on the light to heavy rail connection, potentially reinforcing the Gold Coast as a 'dormitory suburb' of Brisbane. This misses the potential of the light rail to encourage growth and employment within the City itself through connections to older established suburbs.
- Low cost & affordable housing should be encouraged throughout the city but particularly at certain points accessible from the Light Rail. This would reduce the reliance on cars and also promote use of the light rail and public transport infrastructure.

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- Consideration could be given to lowering car parking rates along the key transport corridors as an incentive to utilise public transport infrastructure
 - Given that the Draft City Plan 2015 has been framed in the context of a city “open for business“ and one in which red tape should not inhibit development opportunity it is understandable that the document has been streamlined.
 - Density doesn’t have to be high - Variety of lot sizes provides the opportunity to investigate a number of dense, small lot housing typologies. The small lot code should encourage the exploration of such. Precedents for such are well documented here in Australia and overseas. This scale of development is particularly important for the coastal suburbs from Mermaid Beach to North Kirra. The unique character of these suburbs is defined by the small scale of development both in terms of lot size and building height. This however does not mean these areas cannot sustain a high level of density. *Refer Bamford.* Leave Broadbeach to Southport as the place for testing high density large scale buildings and preserve the character of the southern suburbs.
 - The codes in many cases have become prescriptive to try to deal with the risk of mediocre development applications but leave little room for quality outcomes through Alternative Solutions and good negotiation.
 - The document is disappointing in that in its current form it may not deliver the city that the six Strategic Framework themes aspire to
 - More troubling though is the lack of reference to a sustainable city, a city that could be “biophylic”. (Refer References below at end of document) This city already has the fine ingredients of climate, topography and diversity. We could be at the front edge of world cities (a claim that the fact sheets and marketing blurb tout loudly). Instead this City Plan is about ‘business as usual’ and will most likely foster the most pedestrian of development...anything BUT world class. The City deserves better built outcomes and collectively Council and the profession have the resources and initiative to deliver this.
 - It overlooks the opportunity for the retrofitting of our neighbourhoods by the smaller building contractors to accommodate infill and intergenerational homes. Still focused on keeping a second dwelling on a site to 80 sqm WHY??? Is there some rationale or basis for this specific prescriptive? The City Plan inadvertently obstructs the “small” contractors to underpin the city’s economy and also increase the densification of the city in more harmonious ways than through the ‘cookie cutter’ developments.
 - This Draft City Plan seems to be, as some have described, a “skeleton plan” with insufficient muscle to enact good urban outcomes. It risks homogenising the city since so many prescriptive codes will leave little room for the negotiation processes that have served the city well to date.

2.0 Detailed Discussion Points

Reference	Element	Commentary
1.1	Introduction	<ul style="list-style-type: none"> Higher order objectives are often not reflected in the codes that will inevitably be used to assess projects and development. A more specific 'Vision' for the City's future needs to be articulated across the 20 year horizon and beyond to the population projections for the City at mid-century. This would include major projects and city wide goals and long term objectives. Better reference to key elements of the comprehensive and insightful Corridor Study prepared for the light rail project. This document contains many practical and considered initiatives to reinvigorate the built and urban form along the corridor that are not reflected in the draft City Plan. The key vision of plan, the big idea, is not clearly stated and reflected in the strategic framework. This requires greater ambition and clearer development in the strategic framework. Show photographic examples of innovative public spaces and buildings from around the world. The examples do not exactly set a high standard, particularly if the aim of the plan is to create a world-class city. The control of height and density, whilst well intentioned to reduce poor outcomes, has the potential to limit innovation and performance based outcomes. Why is building height associated with a world-class city? Zurich has no tall buildings but is world class, likewise Copenhagen, Oslo, Helsinki to name a few.
2.0	State Planning Provisions	<ul style="list-style-type: none"> It appears that under the State Planning Act code assessable development cannot be referred back to the "intentions" of the SF Themes. Strategic Framework intentions are not DEOs.
		<ul style="list-style-type: none"> Extent of developable land available within the City will not allow the State Government density objectives in nominated areas.
	Infrastructure Charges	<p>2.1 Adopted Infrastructure Charges Resolution</p> <ul style="list-style-type: none"> No infrastructure charges levied for any change in non-residential land use of existing buildings is strongly supported. Prior to the adoption of the above, we were engaged by a number of clients for feasibility studies on various food and beverage and retail proposals. These projects were deemed financially unsustainable due to the high up-front costs associated with the material change of use of an existing building and the subsequent infrastructure charges. As a result, we have since executed these very successful small-scale projects for these clients in Brisbane where these charges did not exist. <i>Refer - Sourced Grocer Teneriffe. Named best Neighbourhood Shop Monocle Magazine.</i>
1.5	Cut back in planning assessment requirements	<ul style="list-style-type: none"> Reduction of unnecessary reporting and assessment documents is commendable in principle. Are there safeguards in place to ensure quality development outcomes? How can Appeal triggers be minimised through the transparency of the planning process if this is abbreviated?
		<ul style="list-style-type: none"> Who arbitrates/negotiates to assess the quality of the proposal to produce better outcomes? What are the

		measures?
		<ul style="list-style-type: none"> To continue to facilitate better outcomes for key components of the City in specific places and circumstances, it is important that 'Major Projects' remain independent of the constraints of the City Plan and allow key projects to be independently assessed on merit.
Part 3	Strategic Framework	
3.1		<ul style="list-style-type: none"> Excellent intentions in some of the themes eg shaded streets for people not car focus. And a push for cycling and public transport. Unclear how the intent of the strategic framework themes is reinforced via other parts of the City Plan instrument.
3.1.1	Sustainability	
	'Ensuring appropriate and sustainable development' is a stated aim	<ul style="list-style-type: none"> How is sustainable development to be achieved? Is compliance with codes the expected mechanism? Scheme lacks overt commitment towards sustainable outcomes.
3.2 Strategic Intent	3.2.1 World class City	<ul style="list-style-type: none"> The strategic framework, chapter "3.2.2 City shape and urban transformation" defines "the Gold Coast is a linear city surrounded and penetrated by a green, gold and blue framework. The city's settlement pattern has been shaped by physical attributes – the coast, waterways and hinterland – and road and rail routes. These forces will continue to shape the city and the types and roles of places within it."
	3.2.2 City Shape & Urban transformation	<ul style="list-style-type: none"> With the elimination of LAPs, does Council support any relaxations of codes to help facilitate lively and vibrant development in emerging character areas/villages (Burleigh, Chirn Park, Nobbys, Miami etc)? The decreasing number of large developable parcels of land within the city will have the effect of reducing the scale of future development in the City. The predominant model of urban form over the past fifty years– the high rise on podium – will potentially become an exception if site amalgamation options are limited. Other jurisdictions allow 80% consent of owners in order to unlock land parcels in urban areas. The city would do well to incentivize better built form and amenity outcomes in buildings of 6-10 storeys as this will likely be the predominant form of the next urban transformation. Encourage the adaptive re-use of character buildings throughout the city. Encourage the adaptive re-use of existing factories in light industrial zones adjoining key public transport routes and brownfield areas. A number of existing high-rise buildings will soon be nearing the end of their lifespan as apartments – evidenced in the recent demolition of Iluka. The city needs to begin to investigate ways of encouraging the re-adaption of these structures for new potential uses. Their presence as part of the existing built factory is critical to the collective memory of place and history of the city. Potentials may include Energy Production refer 7.1 or Urban Agriculture refer 7.2 or vertical caravan parks – there are various options. They may also be seen as ways of diversifying the economic output of the city. Potential for additional bonuses may be applied in accordance with SC 6.5.

	3.2.3 Globally Competitive Economy	
	3.2.4 Strategic Framework structure	
3.3 Creating Livable Places	3.3.2 Urban Neighbourhoods	<ul style="list-style-type: none"> Greater emphasis should be placed on encouraging the vibrancy and diversity of emerging 'villages' within the city's urban neighbourhoods.
	3.3.3 Suburban Neighbourhoods	<ul style="list-style-type: none"> Suburban neighbourhoods need to evolve as our demographics shift through encouragement of diverse housing options such as intergenerational homes, young families, built form that allows 'aging in place' etc. this creates diversity and promotes social cohesion. In order to actually deliver the goal of "increasing housing choice across the city", opportunities for diverse forms of housing must be both available and incentivised. Currently, there are numerous disincentives to the creation of small lot housing, which is one of the most valuable strategies for the creation of housing choice and affordability. Outlined below are some specific amendments required to unlock at least a sample of the benefits that small lot housing can deliver to the city by way of its compaction and character-appropriate neighbourhood revitalisation.
	3.3.4 New Communities	<ul style="list-style-type: none"> Lower cost housing options are inevitably at a city's fringes where infrastructure and amenity are minimal To create and encourage true housing affordability development of these areas must include provision for transport, shops and recreation to develop social cohesion and long term viability.
	3.3.6 Townships	
	3.3.7 Rural Residential Areas	<ul style="list-style-type: none"> Prescriptive lot size at 8000m² may not be appropriate across all potential rural precincts Investigation areas noted for urban development could be developed with input from the local architectural community. Subdivision to smaller lot sizes and even a mix of lot sizes within these areas could be acceptable if well designed and considered in context Setbacks from boundaries/ road frontages may not be a useful mechanism for controlling built form outcomes & site optimisation Rural areas may benefit from provisions related to siting of neighbours/ visibility / topography/ existing vegetation instead Recent Landscape character study.
3.4 Making Modern Centres	3.4.1 Strategic Outcomes	<ul style="list-style-type: none"> Designating centres eg Burleigh Heads as a District Centre sounds positive but without any protection of its character (without LAPs) there is little to protect it from any number of <4000sq m code assessable commercial developments...potentially risks destroying the very nature that makes Burleigh Heads special. This would apply to other centres nominated also. Rather than focus on 'Centres' encourage higher densities along the current and future rail corridors Implement minimum densities to lock in certainty of development outcomes with incentives for better outcomes at higher densities Provide height incentives to encourage development in nominated 'centres'. US provides ominous examples of dying Neighbourhood Centres where surrounding development is predominantly low rise.

		<ul style="list-style-type: none"> Centres require activation through density to thrive.
	3.4.2 Mixed Use Centres	<ul style="list-style-type: none"> The provisions offer some limited variations in solutions (although primarily for particular developments) while the zones are in widely varying locations across the City. More specific tailoring of solutions to different precincts and locations would encourage development in these areas also. Outcomes are general and not specific Outcomes are written in future tense (eg. Robina connected via light-rail extension to the coastal corridor) but inconsistently elsewhere Nerang – intent seems considered however careful planning incentives in the short-medium term will be necessary in order to encourage these outcomes. Burleigh Heads and West Burleigh intent and format will be likely to continue to develop very differently to each other. Perhaps these areas should be separated now given their divergent needs and uses. There are no centres nominated within the developed areas of Ashmore/ Bundall/ Benowa. This could be considered and included in the next Amendment. Consider the rezoning of areas such as Bundall Road / Bermuda Street/ Isle of Capri to allow commercial to both sides of the street rather than the step off from intense commercial to predominantly single storey houses converted to low impact commercial.
	3.4.3 Specialist Centres	<ul style="list-style-type: none"> Surfers Paradise should include encouragement / incentives for permanent accommodation Bundall needs to strongly encourage significant residential. This is needed to increase overall densities and to create extended active hours to support the Cultural Precinct.
	3.4.4 Mixed Use Centre & Specialist Centre Design & Operation	<ul style="list-style-type: none"> (4) Note specific decision in some cases for abrupt change in 8ldg. heights “to achieve a deliberate & distinct contrast in built form” This is in marked contrast to previous preference for graduated transitional change.
	3.4.5 Neighbourhood Centres	<ul style="list-style-type: none"> Most neighbourhood centres noted already exist Encouragement and incentives needed to allow the evolution of other neighbourhoods into Centres Allow neighbourhood centres to evolve naturally through desire and market forces Extend carparking relaxations in existing areas to reinvigorate stagnant areas within the city.
3.5 Strengthening & Diversifying the economy	3.5.1 Strategic Outcomes	
	3.5.2 Industry & Business Areas	
	3.5.3 Working from Home	
	3.5.4 Tourist Economy	<ul style="list-style-type: none"> Greater utilisation and celebration of our unique cultural and historical built form Cultural tourism as a driver for city wide change Recognising and unlocking the potential for arts and Culture to transform the city and its place through tourism Encourage the growth and potential of a thriving local music, performing and visual arts scene to contribute to the diversity of the local economy through tourism and employment. Re-direct the tourist focus to target a broad range of

		<p>demographics. There is a perception the Gold Coast is a cheap destination. This is highlighted by the proliferation of discount holiday packages and budget airline offers.</p> <ul style="list-style-type: none"> • Communicate the notion there is more to the Gold Coast than Surfers Paradise. It is a diverse and unique city. The marketing strategies should reflect such. Where do the local's live? How do the local's live? Where do the locals go? What do the locals do? We do not need to compete with the obligatory 'eye' or viewing platform that every city in the world seems to have. Our uniqueness is in our natural environment and how our people interact with it. - an authentic Gold Coast experience. • We are home to one of the largest surf and leisure brands in the world as well as numerous other smaller creative leisure brands. These brands have fostered a strong design community particularly in the south of the city. Utilise these brands as marketing collateral. • Continue to support events that relate to the key strategic framework of the city. Among others; Gold Coast Marathon – Active and Healthy. Quiksilver Pro – Surfing Culture. Bleach, The Surfers Paradise Festival, Opera on the Beach – Cultural Development, The Sanctuary Cove Boat Show – Marine Industry and Waterways. Perhaps an annual design festival?
	3.5.5 Natural Resources	<ul style="list-style-type: none"> • Greater recognition and promotion of the natural beauty at the City's doorstep. • Recognition of the potential for this unique natural landscape to better define the character of the Gold Coast.
	3.5.6 Rural Production	
3.6 Improving Transport Outcomes	3.6.1 Strategic Outcomes	
	3.6.2 Integrated Transport system	<ul style="list-style-type: none"> • A significant part of the new town plan is driven by the implementation of the light rail. • The experience in other cities with MRT or light rail is that the light rail continues to expand to meet the demand of the city, eventually creating a city wide network. • Importantly the expansion of the light rail creates new development pathways and nodes of density. A more sophisticated and accessible public transport system actually establishes the new template for more intensive development. • City needs to examine opportunities for density associated with the alternative and future routes. • Future routes should be positively informed by planning and opportunity studies for higher density corridors by City which ultimately become a major basis for future town plans. • Urban renewal areas 8.2.10 should include more areas - especially west of rail line. Consider residential detached dwelling areas in Broadbeach Waters etc. • Light rail corridor needs to provide greater reduction in carparking rates if the light rail is to succeed. • The feeder corridors leading into the light rail corridor in an east west direction should also be considered as part of the light rail infrastructure planning and these corridors should encourage higher density to help feed the light rail and make that successful. The Corridor alone is not enough to make that system viable.
	3.6.3 Enhanced access & mobility	<ul style="list-style-type: none"> • Footbridge connections to allow better access from low density areas to light rail corridor. This provides better usage of the infrastructure and encourages non- vehicle travel reducing the pressure on parking and road networks.

	3.6.4 Transport System Efficiency	<ul style="list-style-type: none"> • The light rail Corridor study document contained a number of innovative measures to encourage growth along the transport routes that would, in turn, improve efficiency and help sustain the light rail and reinforce the need for network expansion as population increases. • Greater reference to key elements within this document should be included in future iterations of the City Plan. • Potential to investigate future high frequency 'circle' bus routes which link the interstitial areas, with the key public transport routes. • Potential to investigate future high frequency public transport link between Varsity Lakes and Burleigh Heads. This is especially critical given the medium density provisions for the area adjoining varsity lakes and the poor public transport currently servicing this area and the 4 district centres along west Burleigh road which are not being provided with a high frequency transport route. • Is the public ferry system still planned. This does not appear to form part of the transport plan. • Encourage high frequency east-west public transport options along Ashmore Road.
	3.6.5 Air transport	
3.7 Living with Nature	3.7.1 Strategic Outcomes	<ul style="list-style-type: none"> • Where is the innovation in the "living with nature" aspiration? • Strongly support the consolidation of the urban footprint and limit greenfield development.
	3.7.2 Natural Landscape Areas	<ul style="list-style-type: none"> • An implication that the city might aspire to being a "biophilic" city (Perth, Singapore, among others' have signed up –refer document appended) • This city plan guides policy for 20years yet advances no innovative ways to integrate green environments into denser city neighbourhoods. • Preservation of natural landscape and waterway corridors is strongly supported. Low impact uses including canoeing, kayaking, SUP, rowing trails incorporating supporting accommodation and ancillary facilities is proposed to encourage education, exploration and overnight adventures along our key waterways. A similar approach could be applied to the landscape corridors with a series of hiking, climbing and walking trails. There is potential to link these to existing infrastructure such as the Great Walk for Lamington National Park to Springbrook. In addition, the water and land trails could be linked to a public art and architectural program. This could be viewed as an extension of the very successful Active and Healthy program. Refer Appendix D – Varangar National Tourist Route Norway, Trans Swiss Trail. • Continued reinforcement, connection and activation of waterways surrounding the denser areas of the city. Continue to implement the Surfers Paradise Riverwalk and the Oceanway. Brisbane is an excellent precedent of how to successfully re-engage with the river. • Continued re-establishment of the engineered Loders Creek catchment as a major waterway and wetland through the city. The upper reaches of the catchment extend to the north and south of Olsen Avenue and Currumburra Road. The revegetation and revitalisation of the catchment will provide a filter for run-off entering the broadwater and also increase amenity for the residents adjoining. As a result, it has the potential to also facilitate increased density along its edges as per 6.4.4. Other engineered catchments for potential regeneration include adjacent Slatyer Avenue Bundall, Glenmore Drive Ashmore, west of Uplands Drive Parkwood, Laguna Avenue Palm Beach, Currumbin Creek Road Currumbin, Tugun Street Tugun, Winston Street North Kirra, Reedy Creek Burleigh, Bermuda Street Burleigh. • Preservation of the old rail corridor through Molendinar and

		Parkwood as parkland and nature reserve.
	<p>3.7.3 Green Space Network</p> <p>Promote long term projects - green space networks, coastal wetland and watercourse areas projects</p>	<ul style="list-style-type: none"> • Rethinking how the City's natural topography and waterways/ flood corridors could be better utilised as a green ribbon connecting the City. This could provide the basis for increasing density along these 'greenways' with public amenity • Perhaps, the planning scheme could be less about control, and more about actual projects, and long term ambitions. • If council are proposing rehabilitation or bridges or walkways, or ocean ways, or new beach side parks, or boulevards, or river crossings, or a ferry system, or a cut & cover of the highway in key areas such as Burleigh Heads, perhaps they could be coordinated with re-zonings. • Plans for new high quality public green space networks infrastructure could be accompanied by a review of the zoning maps. • Strong support for the continuation of the street tree planting program and pedestrian focused traffic calming initiatives. Continue to encourage the development of key public transport routes as tree-lined boulevards of specific species to potentially represent different routes. • Encourage the use of gardens and landscape above ground level via SC 6.5 and on existing buildings in line with the key strategic framework. Very few buildings take advantage of their roof space. There is a huge amount of potential to utilise these spaces for gardens and; agricultural and energy production. Vertical and sky gardens should also be strongly encouraged. This would reduce the urban heat island effect whilst also reducing the overall built mass and activating the city vertically. Refer Istanbul and Singapore
	<p>3.7.4 Nature Conservation</p>	<ul style="list-style-type: none"> • Regrettably saving the "green" is largely related to consolidating built form...a laudable but already established city goal.
	<p>3.7.5 Coastal, Wetland & Watercourse areas</p> <ul style="list-style-type: none"> • Celebrate the Beach 	<ul style="list-style-type: none"> • It is disappointing that the beach is not given a proper width on any map. • The beach is the number one defining feature of the Gold Coast, and must be more clearly drawn on all Gold Coast planning scheme maps, and more obviously covered as part of the Gold Coast's natural experience. • The SFM4 Greenspace Network, landscape character areas key, would suggest the beach as being a series of separate dots. It is not. • As a sub-tropical, east coast urban metropolis, with over 300 days a year sunshine, why are we not all cycling to work down the beach? • Why not propose a new landscape character area at Broadbeach? • The beach is the city's longest, continuous, most recreationally accommodating, defining, "greenspace". • A clear position must be made, on how it is to grow with the growing needs of the city.
	<ul style="list-style-type: none"> • Allow interaction of Urban Areas with Nature - or - Allow nature in the City 	<ul style="list-style-type: none"> • The strategic framework, chapter "3.2.2 City shape and urban transformation" defines "the Gold Coast is a linear city surrounded and penetrated by a green, gold and blue framework. • The city's settlement pattern has been shaped by physical attributes – the coast, waterways and hinterland – and road and rail routes. These forces will continue to shape the city and the types and roles of places within it." • The two strategic elements "3.3 Creating liveable

		<p>places"and "3.7 Living with nature" have been unnecessarily separated.</p> <ul style="list-style-type: none"> • As separate items they don't reflect the reality of the Gold Coast as an urban settlement. • By considering nature as separate, the city may inadvertently turn its back on its natural environment. • The beaches, green heart, and flood plain are obviously going to be more "inhabited" in the city, and less "inhabited" in the hinterland beyond. • A clear position on how emerging areas such as Coomera, will interact with nature, must be made. Otherwise these areas may turn their back to nature, or be isolated by nature, instead of being defined by existing natural elements - such as the Coomera River. • This might also encourage discussion such as using Main Roads controlled networks such as the Gold Coast Highway as continuous landscape corridors.
3.8 A Safe, Well Designed City	3.8.1 Strategic Outcomes	<ul style="list-style-type: none"> • What about quality Architecture – why is it limited to urban design?
	3.8.2 Landscape character Shaded streets and carparks	<ul style="list-style-type: none"> • Appears to be no strengthening of landscape requirements to achieve these ambitions. • Some incentives in Community Benefit Policy for saving a tree or constructing extra landscaping but not applicable to the run of the mill developments.
	3.8.3 Urban design, character & community identity	<ul style="list-style-type: none"> • The quality objectives of the built environment are not enshrined in the codes. • The Community Benefit Bonus Elements Policy attempts to reward good design and it is laudable that council offers incentives for better designed outcomes. However the quantifying of developer initiatives (eg Protection of Heritage, extra landscaping, sustainable development) require further consideration. • For example the retention of a heritage building may need approval for a small lot subdivision rather than extra floor space as compensation/incentive. • Such alternative rewards need to be facilitated through the instrument and the negotiation/determination process. • The extent of delegated authority to enable appropriate negotiation towards better outcomes needs to be clarified not only for the application of bonus policy but also for the Assessable development applications. • One strongly suggests the development of a coastal character code and expansion of the heritage code which applies to established and coastal suburbs including but not limited to Budds Beach, Mermaid Beach, Nobbys Beach, Burleigh Heads, Palm Beach, Tugun, Currumbin, North Kirra, Coolangatta and areas of Surfers Paradise, Southport, Broadbeach, Florida Gardens and Isle of Capri. Documentation of these existing projects is also strongly advocated. <i>Refer - http://www.sunshinecoastplaces.com.au.</i> • The intent is to encourage adaptive re-use of existing buildings of significant character and the adoption of design strategies that reflect those of such in new projects. This may relate to increased bonus provisions relating to SC 6.5 which are currently too finite eg. small lot sub-division bonus. • Another potential suggestion to deal with this is similar to the inclusion of the separate provisions for the West Burleigh Historic Township Precinct in the Neighbourhood Code or the Mudgeeraba Character Overlay Map. • Advocates increasing the scope of the Heritage Code to include provisions for buildings of significant character outside of the state heritage list. Careful consideration is required with regard to the collective worth of these buildings

		<p>on the makeup of our coastal urban fabric, in a city devoid of much historical collective memory. Reference can be made to the historical and monetary worth attributed to the 'Queenslander' vernacular in Brisbane and the workers cottage/row/terrace house vernacular in Sydney and Melbourne and the compounding effect of their preservation on the quality of the neighbourhood as a whole.</p> <ul style="list-style-type: none"> • A number of well-documented precedents exist in these cities and internationally for developing projects subject to preservation. • Preservation need not be viewed as anti-development. Refer – Going For Gold, Issue 70, Monocle Magazine. An industrial character code may also be applicable for mixed-use projects within previous light industry areas such as Bundall and Southport adjoining Nerang Southport Road and Johnston Street, both of which are in close proximity to the light rail.
	<p>3.8.4 Cultural Heritage</p> <p>“Cultural places identified in the State and local heritage register are conserved and heritage significance protected.”</p> <p>“The viable reuse of places of cultural heritage value occurs where appropriate and where impacts can be managed to an acceptable level.”</p> <p>Areas of the city with an historical urban form and character are recognised and conserved, including:</p> <ul style="list-style-type: none"> • Mudgeeraba – the traditional rural village ‘old town’ character, including the historic pattern of development and form and appearance of historic buildings; • Southport – the surviving pockets of historical character of Southport as an early twentieth century resort township and commercial centre, including neighbourhoods, streetscapes and groups of buildings, and places of special value; and • Nerang and Coolangatta – places of character or cultural heritage” 	<ul style="list-style-type: none"> • The Draft CP gives lukewarm support to Heritage merely acknowledging protection/adaptive reuse “where appropriate”. It is not proactive in offering incentives to save places of character value which may not be state listed. • Potential for Cultural Heritage to be a key economic driver for the city. Cultural tourism could be greatly expanded on the back of the established leisure tourism infrastructure available in the City as well as the emerging Cultural Precinct • What are the mechanisms to enable a proactive property owner/developer to save places of value and achieve a win-win for all parties? • The Community Benefit bonus elements policy applies only to medium density zones and above. • The incentives are overly narrow (offering 1 bedroom for each 25sqm of space taken up by the “heritage element”). • By listing only these four specific areas Southport, Mudgeeraba, Nerang & Coolangatta seems to ignore or diminish the diversity and value of places and buildings of cultural and heritage significance scattered throughout the city that may be less than 100 years old. • Also, the listing reinforces the commonly held view that only places/ buildings from the first phase of Gold Coast development are of heritage significance, potentially diminishing the rich Cultural heritage value and character of mid-century and more recent places and buildings. • Potentially discriminates against places of character importance but not eligible to be State Listed. Many exist in the GCCC Urban Heritage and Character Study and remain worthy of retention/adaptive reuse. • This implies that the city has become shy of heritage for fear that it will deter developers. • World cities embrace their unique cultural identity, herald their differences and their heritage and show leadership in developing the instruments to facilitate win-win outcomes. • The heritage code should strongly encourage adaptive reuse of existing buildings. This should not be limited to projects listed under the state heritage register. This is critical in ensuring the quality and character of our urban realm is not lost.
	3.8.5 Safe, Healthy & Cohesive communities	
	3.8.6 Environmental Health & Amenity	
	3.8.7 Natural Hazards	<ul style="list-style-type: none"> • Sea level rise impacts as a consequence of Climate change should be specifically considered. • Free access to 1 in 100 flood information across the city.

	3.8.8 Sustainable Infrastructure Provision	
4.0 Priority Infrastructure Plan		<ul style="list-style-type: none"> PIP charges now increased 1 bed to same value as 2 bed. This will encourage reduction in 1 bed product and increase in 2 bed due to cost., this should revert to sliding scale to encourage better outcomes.
5.0 Tables of Assessment	Table 5.5.1 Low density residential zone (where not in the Large lot precinct)	<p>Residential activities (page 5)</p> <p>Self Assessment*</p> <p>Add:</p> <p><i>“Dwelling house if;</i></p> <p>(a) <i>on a lot with an area less than 400m2; or</i></p> <p>(b) <i>on a lot with a frontage less than 15 meters”</i></p> <ul style="list-style-type: none"> Adding a reference to small lot dwellings here only makes sense to cover the fact that there may be lot of this size already in the Low density residential zone, or in a case where there might be one due to an ROL. Simply listing the level of assessment of the dwelling on the lot does not permit the lot to exist in the first place.
	<p>Table 5.5.2 Medium density residential zone</p> <p>Table 5.5.3 High density residential zone</p>	<p>Residential activities</p> <p>Self assessment*</p> <p>Add:</p> <p><i>“Dwelling house if;</i></p> <p>(a) <i>on a lot with an area less than 400m2; or</i></p> <p>(b) <i>on a lot with a frontage less than 15 meters</i></p> <p>Code assessment**</p> <p>Remove:</p> <p><i>“Dwelling house if;</i></p> <p>(a) <i>on a lot with an area less than 400m2; or</i></p> <p>(b) <i>on a lot with a frontage less than 15 meters”</i></p> <ul style="list-style-type: none"> By making the self assessable provisions of the small lot housing (infill focus) code more stringent, Code assessment will be the natural consequence when an SO cannot be achieved.
6.0 Zone Codes	6.1 Preliminary	<ul style="list-style-type: none"> Codes are intended to facilitate Performance Based responses yet are more prescriptive...offering little opportunity for innovative alternative solutions. This is particularly noticeable with height requirements. Potentially could result in (on bigger developments) applications for Preliminary Approvals and a subsequent preparation of a site specific code?
	6.2.1 Low Density Residential Zone Code	<p>6.2.2-1 and 6.2.3-1 Self-assessable development criteria</p> <p>SO1 Setback</p> <ul style="list-style-type: none"> Setbacks are more onerous than for a typical dwelling, which serves as a disincentive to small lot housing. Although developing appropriate setbacks is not a simple task, the key is for those setbacks to provide less onerous setbacks to small lot housing, but pair that increase in the commodity of the lot with a corresponding increase in its amenity. <p>SO2 Site Cover</p> <ul style="list-style-type: none"> Site cover also needs to be significantly less onerous than for a standard dwelling, yet with landscape and vegetation expectations that will serve to address the increase in the ratio between built form and open space. A site cover of 75% is probably about right for a Self-assessable small lot outcome.

		<p>SO5 Density</p> <p><i>Add:</i></p> <p>“OR</p> <p><i>Density does not exceed one dwelling per 200m2 where an existing corner lot is being sub-divided for small lot housing”.</i></p> <ul style="list-style-type: none"> • At one dwelling per 400m2, there will not be much viability for corner lot small lot Reconfigurations of lots, while a minimum of 200m2 will unlock the opportunity to have three dwellings where one once was, unlocking the viability of some potential developments that will present the high standards of the small lot code to the community. • Obviously, at one dwelling per lot, density in the zone code is 'invisible' for small lot housing, but is controlled in the Reconfiguration of lots code. • It would be good, however, to confirm that a secondary dwelling does not contravene the "one dwelling per lot" density limit. <p>6.2.2-2 and 6.2.3-2 Assessable development criteria</p> <ul style="list-style-type: none"> • The same comments apply to the Performance Outcomes and Acceptable Solutions as applied to the respective Self-assessable criteria, and so the same changes would be required. • In addition, we recommend the following: <p>PO7 and AO7.1 Lot design</p> <p><i>Amend:</i></p> <p><i>“RD2 and RD3 to be a Minimum lot size of 200m2”</i></p> <ul style="list-style-type: none"> • By allowing a minimum lot size of 200m2, existing 16 perch lots that are not too valuable to be used for small lot housing product, but which are still located close to services and amenity, could be split into two, which may just be a economically feasible if the existing house on the lot is not of a high quality. • This slight adjustment to the minimum lot size will allow at least a few viable lots to be split in Brownfield areas, thereby getting some examples on the ground. <p>PO8 and AO8.1 and 8.2 Lot design</p> <p><i>Add:</i></p> <p>“OR</p> <p><i>Density does not exceed one dwelling per 200m2 where an existing corner lot is being sub-divided for small lot housing in accordance with the provisions of the small lot housing (infill focus) code.”</i></p> <p><i>Add:</i></p> <p>“OR</p> <p><i>There is no minimum road frontage 17m where an existing corner lot is being sub-divided for small lot housing in accordance with the provisions of the small lot housing (infill focus) code.”</i></p> <ul style="list-style-type: none"> • PO8 is unclear as to the application of the minimum 600sqm lot as this contradicts the 400sqm minimum density. Is this applicable to new subdivisions only? If so, why would 400sqm not be suitable for new low-density development? • Current allowance for infilling of existing garages and extensions of carports - which become garages post approval - and solid 1.8m high fencing is destroying the fabric of existing streets particularly in established neighbourhoods. It is a very critical issue. A criteria for assessment would be most beneficial dealing with this issue similar to that already in place for new housing adjoining parkland and the like – fencing 1.2m high or 50% open. A proposed Southport/Coastal character code would also apply in this
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		<p>instance to further reinforce the vernacular and historical qualities of these areas.</p> <ul style="list-style-type: none"> • Allocation of areas for low density are still positioned within 400m of key public transport corridors. There is potential to integrate additional small lot/medium density housing typologies in these areas. Refer Light Rail Code comments.
	6.2.2 Medium Density Residential Zone Code	<ul style="list-style-type: none"> • Variety in lot size is strongly supported and could go further to 150 sqm. This will have a profound effect on the delivery of various affordable housing models and typologies. It will facilitate a greater level of adaptability and encourage a variety of developers of different scales. This will assist in the continued delivery of projects even in times of funding shortages, which tend to affect large-scale developers, which the previous city plan tended to pander to. • Greater clarification of uses is required. If carwashes, service stations and the like are acceptable they should be dense models of such to ensure greater consistency with respect to the built form. Should light industry be considered? Should small creative offices be considered or is this limited to the new home business code? If so these types of activities should be encouraged to be located at ground level. • Refer 3.1.2 for potential risk with regard to small lot housing and street fabric. • Areas zoned medium density should be adjacent main public transport routes. There are a number of instances where this does not occur in particular past developments. • Setback requirements for small lot housing is overly restrictive and does not encourage innovation and variety. Refer 4.9.3. • There is more medium density development in the poorly serviced northern suburbs than the more established well serviced infill, inner city areas. This is a fundamental error in planning for the city.
	6.2.3 High Density Residential Zone Code	
	6.2.4 Centre Zone Code	<ul style="list-style-type: none"> • Emphasis in the Centre zones is on creation of urban centres, with intent being to " maximise street life, safety, pedestrian activity & a vibrant day & night economy" <i>" (13) clear & specific targeting of "strong sense of enclosure at the street edge & little or no bldg setback to the street"</i> • In fact the Neighbourhood Centres Code sets a maximum street setback of 2m • Is this to external dining areas or actual building face? Need flexibility to encourage outdoor dining & activity. • Generally speaking the centre code is non-descript and leaves more questions to be asked than answered. It tends to describe the intent of the larger centres but not those at a district level and in particular those with a high level of amenity and character. • Is there any criteria for assessment? This appears to be missing. • Strongly encourage the re-definment of shopping centres in brownfield, inner city sites is supported to facilitate more traditional urban settings – high street etc. Ensure the zoning is very specific with regard to key transport linkages. Nominated centres not adjoining proposed high frequency public transport routes should potentially be zoned Neighbourhood Centres with respect to density and uses. • When applied to the zoning maps, there is a large variety of urban settings/scales that this code applies to. From car focused shopping centres to fine grain urban centres and large-scale commercial and public spaces. To have one code apply to such has the potential to destroy the character

		<p>of the smaller scale, fine grain urban centres of high character value and amenity. Part 4.6 investigates a means of minimising damage to the quality of these centres with respect to the removal of the LAP's. The intent is to encourage adaptive re-use of existing buildings of significant character and the adoption of design strategies reflective of such for new projects. In doing so, preserve the qualities of these centres which have thrived in recent years. The collective combination of the small projects developed within these centres of late has exceeded any result of the new large-scale urban developments developed in this city. Large development does not necessarily equal better economic, design and urban outcomes.</p> <ul style="list-style-type: none"> • Variety in lot size (small) should be encouraged with a maximum lot size especially with regard to the smaller scale centres as noted in 3.4.3. This will encourage a variety of retail, commercial and housing offerings throughout the city that has the potential to increase affordability across these areas especially outside of the larger single owner shopping centres with high maintenance and operating costs. • Greater clarification is required with respect to use. Further to 3.4.3, greater emphasis should be attributed to local business owners and local products and produce – Farm direct to Plate. This may be dealt with as reduced infrastructure charges or increased bonus provisions relating to SC 6.5. There is potential to link this to the production areas such as the rural zone or potential urban agriculture as discussed in 7.10. • Encourage the development of greater high quality community infrastructure in coastal principle and specialist centres and therefore, a greater number of permanent residents. If there is no reason for locals to visit areas why would tourists? The needs of the community have to be prioritised. A Surfers Central Library? The oceanway? An indoor community or sports centre? Permanent marketplace/fishmarket? Broadbeach public bathhouse?
	6.2.5 Neighbourhood Centre Zone Code	<ul style="list-style-type: none"> • Agree in principle with the code. Mapping needs to relate to the desired outcomes of the code. Some areas zoned centre should potentially be zoned neighbourhood centre due to the fine grain scale of the urban fabric. • Variety in small lot sizes should be encouraged. Reduce maximum shop size to 750sqm. The size of the Woolworths Burleigh is 720 sqm for instance. This will encourage a variety of retail, commercial and housing offerings throughout the city that has the potential to increase affordability across these areas especially outside of the larger single owner shopping centres with high maintenance and operating costs. The variety in lot size leaves open the potential to create various fine grain public squares, laneways and arcades. • Greater clarification is required with respect to use. Greater emphasis should be attributed to local business owners and local products and produce. Refer 3.4.5. This would encourage a truly authentic neighbourhood experience.
	6.2.6 Sport & Recreation Zone Code	
	6.2.7 Open Space Zone Code	
	6.2.8 Conservation Zone Code	
	6.2.9-11 Low Impact Industry Zone Code	<ul style="list-style-type: none"> • The overlays for Flora & Fauna appear to further reduce the extent of the light industry zones throughout the City. • This potentially limits the flexibility of the city to accommodate these employment & economic drivers • 10m wide Buffer Zones potentially make the effective use of

		<p>land zoned Light Industrial difficult.</p> <ul style="list-style-type: none"> Investigate provision to allow housing, cultural and retail uses into the mix albeit at a small scale in particular areas with potential for regeneration eg. Miami, Burleigh Heads, Mermaid Beach, Palm Beach, Bundall and Southport. Refer 4.6 with respect to development of character code for light industrial zones to reinforce the fine grain urban fabric and avoid situations such as large big box retailers a la Masters Bundall.
	6.2.12 Waterfront & Marine Industry Zone	
	6.2.13 Major Tourism Zone Code	
	6.2.14 Community Facilities Zone Code	
	6.2.15 Emerging Communities Zone Code	<ul style="list-style-type: none"> Encourage development that preserves the landscape and natural ridgelines of our unique coastal and hinterland landscape. The green edges are increasingly under threat as evidenced with the ever-increasing loss of greenery on the city's periphery.
	6.2.19 Mixed Use Zone Code	<ul style="list-style-type: none"> 1 Encouragement of mixed use centres generally supported. 2 Where zoned in existing character urban brown field and industrial sites, fine grain character of existing areas should be maintained and reinforced. Refer 3.5. 3 Variety in lot size (small) should be encouraged with a maximum lot size especially with regard to the smaller scale areas as noted in 3.4.3 and 3.4.5. 4 Greater clarification is required with respect to use. Potential in fringe business zones to encourage creative and knowledge based industry. Housing in these areas is supported. Refer 3.4.5 also. 5 These zones should be adjacent major public transport routes. 6 Clarification of minimum lot size. States 1000sqm for sub-division but notes minimum of 300ssqm under density provisions. Small lot sizes should be encouraged refer 3.7.3.
	6.2.21 Rural Residential Zone Code	<ul style="list-style-type: none"> 1 Caution with respect to uses within this zone. Encourage specific rural and ecological uses that do not destroy the amenity of the region. Potential to become a series of small specialty growers, providers and producers servicing the centres and neighbourhoods of the city; providing food security to the region and opportunities for food related tourism. Refer Healesville, Yarra Valley, Barossa Valley. Refer Appendix D Local Grower's Study. 2 Encourage development that preserves the landscape and natural ridgelines of the hinterland. This green edge is increasingly under threat as evidenced with the ever-increasing loss of greenery on the city's periphery.
7.0 Local Plans		<ul style="list-style-type: none"> Whilst removal of redundant or non-enforceable requirements in the existing LAPs may be sensible what are the protections to character and guidance to development propositions in areas of already acknowledged character? All but two Local Governments in Queensland have LAP's or equivalents to protect the diversity of character.
8.0 Overlays	8.2.08 Heritage Overlay Code	<ul style="list-style-type: none"> Villages like Varsity Lakes will completely lose their character and value if connectivity is lost. As much of the connectivity is shared use of private land, there is no protection for that connectivity unless it is cited somewhere, and the Heritage overlay code is probably the only appropriate place for that citation.

	8.2.10 Light rail Urban renewal area overlay code	<ul style="list-style-type: none"> • Greater implementation of strategies from the light rail corridor study including increased density proposals to the west of the light rail line in brownfield sites particularly with regard to areas connected via potential future footbridges. This study is strongly supported. • What is a distinctly Gold Coast apartment typology – Figure 8.2.10-9?
	8.2.14 Ridges & Significant Hills Protection Overlay Code	<ul style="list-style-type: none"> • Strongly support preservation of Currumbin and Burleigh Heads ridgelines. Strongly encourage the code go further to include ridgelines and hills to the hinterland and landscape features including Kirra Hill, Greenmount, North Nobby, South Nobby.
9.3 Use Codes		
	9.3.5 Dual Occupancy	<ul style="list-style-type: none"> • Suggest consideration be given to including Intergenerational homes to address the growing need to allow families to stay in place and homes to adapt. • City Plan obstructs the opportunity via density, area and privacy restrictions. • City should encourage such development for economic underpinning by small contractors. • Reevaluate the impact of density on such small project especially in low res areas. It is no different from a duplex or triplex if well designed, coming into the neighbourhood and should NOT trigger impact assessment.
	9.3.8 High Rise Accommodation Design Code AO10 <p>“Development of multiple dwellings of 15 or more dwellings includes the following proportion of dwelling sizes:</p> <ul style="list-style-type: none"> ○ 15% - one bedroom or studio; ○ 40% - two bedrooms; ○ 25% - three bedrooms or more; <p>remaining 20% is unrestricted”</p>	<ul style="list-style-type: none"> • This prescriptive may not reflect market preferences and has the potential to discourage development if enforced in areas. A different bedroom mix would be better determined by the market rather than planning controls. • Planning controls should stay out of this realm and let the market determine what is required. • Perhaps consider giving a bonus if the suggested ratio is followed. Will end up with apartments that can't be sold due to higher purchase prices.
	9.3.9 Home Based Business Code	<ul style="list-style-type: none"> • Clarification with regard to business employees onsite at any one time – is it 1 or 2? • Does the size of the office, number of employees and parking requirements differ with respect to it's proximity to public transport and zoning as high, medium or low density?
	9.3.16 Secondary Dwelling Code	<ul style="list-style-type: none"> • Code is too prescriptive in demanding an 80 sqm limit to the second dwelling. • Size references should be only a trigger for greater scrutiny of design by council's delegate (not an absolute limit) or a trigger to Impact Assessment.
	9.4.8 Small Lot housing	<ul style="list-style-type: none"> • Can 150 -200sqm lots with rear lanes be accommodated? • Review the small lot code to encourage small lot innovation through lower minimum lot area requirements. • Greater emphasis should be placed on encouraging innovative small lot housing typologies. The code is currently quite prescriptive. There is a number of well documented small lot projects n this country and abroad – this is nothing new. Smaller lot typologies of 150sqm should also be encouraged.

		<ul style="list-style-type: none"> • Support encouragement of low or transparent fencing and street interaction. • Setbacks prescribed in the medium and high density codes are still very prescriptive in particular side and rear setbacks if not abutting a rear lane. Courtyard typologies are example excellent forms of high and medium density housing for our benign sub-tropical climate which maximise privacy and connection open space and natural light. Unfortunately the proposed setbacks restrict the potential to utilise courtyards – the rear setback is particularly inflexible at 6m. If you are allowing a class 10 structure to be built on the boundary for a height of 3m and length of 9m why not allow occupiable zones along this line. Glazing is focused on the courtyard not the fence line and neighbour. Use this as a framework though and apply a 0m setback to a maximum length of 9m of wall but a height of 7.5m and reduce the rear setback to 2m. Refer “46 square metres doesn’t normally become a house”, <i>Jorn Utzon Kingo Houses, James Russell Brookes Street House.</i>
	<p>9.4.9 Social & Health Impact assessment</p>	<ul style="list-style-type: none"> • The Social and Health Impact Assessment should not apply to every application or should be REQUIRED to be done by the Architect; it is unclear and Council Officers by default will start requiring it be done by Social Planners which is inappropriate for most developments. Architects are trained to do this. Many of the matters are dealt with under Green Star provisions anyway. • The introduction of Social and Health impact assessment in many projects across the City will again produce an unnecessary burden on the cost of development and end user will pay more for something that does not add value. This kind of arbitrary report to accompany each development application is unlikely to genuinely improve development outcomes. More common are generic, formulaic reports without substance. • The intent of this section should be noted for addressing potentially high impact uses such as establishment of new licensed premises in areas where they are not currently located • Should have a system that makes the process easier and more cost effective. This makes development and investment in the City expensive and uncompetitive.
	<p>9.4.11 Integrated Transport/Enhanced Mobility and Access</p>	<ul style="list-style-type: none"> • Public transport, walking & cycling access are high priority - intentional transition from suburban to urban environments • Car parking 9.4.11 should be relaxed more significantly (currently 10-15%) for areas close to the light rail; this should be so in residential developments and particularly in tourist areas. • Carparking rates for commercial generally unchanged. Needs to be reviewed downwards if public transport is to be encouraged. • End of Trip facilities 9.4.11.11 are too large in large developments (Shopping Centres etc). these areas are often under utilised. • Need to review these or we will have a multitude of bike parks and facilities with no one using them. The cost to development too great for the purpose. • Car parking 9.4.11 for commercial offices should be REDUCED for areas close to transport, Southport, Surfers and Broadbeach particularly; not as radically as in Brisbane but there needs to be incentive to use the Light Rail. At the moment it is 3/100m² TUA; suggest 2/100m² TUA; this may help new developments become viable, and older developments to expand. • Specific reference to fostering of "street life, pedestrian activity & shared areas for cyclists & cars, with car parking

		<p>either behind or beside buildings"</p> <ul style="list-style-type: none"> • General rule of retail is that visible available parking encourages customers, so this will present a design challenge • Public transport, walking & cycling access are high priority - intentional transition from suburban to urban environments. 									
	<p>9.4.11-2: Transport code for assessable development PO25</p>	<ul style="list-style-type: none"> • Suggest additional point as (b): (b) the spaces are designated and signed for residential purposes of a primary and secondary dwelling on a single site; or 									
	<p>9.4.11-3 Car parking rates</p>	<table border="1"> <tr> <td>Dwelling house</td> <td>Dwelling house</td> <td>2</td> </tr> <tr> <td></td> <td>Secondary dwelling where 80m² or less</td> <td>1</td> </tr> <tr> <td></td> <td>Secondary dwelling where greater than 80m²</td> <td>2</td> </tr> </table> <p>Suggest Amendment: Dwelling where 80m² or less and containing only one bedroom = 1 space</p> <ul style="list-style-type: none"> • If one bedroom homes are not incentivised by allowing reduced on site car parking, the goal of "increasing housing choice across the city", a statement in the Strategic framework, will not be realised. <p>Suggest Amendment: Secondary dwelling where 80m² or less = 0 spaces Secondary dwelling where greater than 80m² = 1 space</p> <ul style="list-style-type: none"> • If secondary dwellings are penalised by the requirement of difficult-to-achieve on site car parking, the goal of "increasing housing choice across the city", a statement in the Strategic framework, will not be realised. Also, the Secondary Dwelling Code mandates that "The secondary dwelling shares its driveway and vehicle crossover with the primary dwelling", yet a tandem space is only counted as one space unless it belongs to the same dwelling (PO25 above). If these controls are not changed, we will not have increased housing choice, and—when it is achieved— the result will be a sea of car parking in front yards. 	Dwelling house	Dwelling house	2		Secondary dwelling where 80m² or less	1		Secondary dwelling where greater than 80m²	2
Dwelling house	Dwelling house	2									
	Secondary dwelling where 80m² or less	1									
	Secondary dwelling where greater than 80m²	2									
<p>Schedule 2 Mapping</p>	<p>Current zoning maps could "inspire" liveable places/living with nature</p>	<ul style="list-style-type: none"> • The zoning maps, have the opportunity to be more inspirational, and less business as usual. For example, it is a tragic waste that often suburban back fences face major public parks. • One strategy could be to allow higher quality developments on lots that face green space networks, as of right. • Perhaps, these higher developments and activities adjacent the "greenspace" networks would "use" them. Otherwise, will the City of Gold Coast's greenspaces be enjoyed as expected? • Council could approach local architects to work collaboratively with Planners and Urban designers to review current zoning maps to "inspire" liveable places/living with nature. • For reference, local AIA members and Griffith University school of Architecture are keen to initiate, support and convene an EBD (Enquiry By Design) workshop (along the lines of the workshop described in the attached publication) looking at GC Futures. • The exact extent and nature of the workshop needs further consideration. Suggest early in 2015 (late Feb early March). It would be desirable to have Council to be a partner/participant 									

		<p>in this activity, though it should be emphasised that the agenda/scope would be established, in consideration, but independently of their input so as not to constrain the potential discussion points.</p> <ul style="list-style-type: none"> The aim would be to provide a design voice and input for future iterations of the City Plan including Amendment 1.
	Residential Density Overlay Map	<ul style="list-style-type: none"> These appear to have remained pretty much the same with the Southport PDA and the light rail corridor the only areas where densities have increased. Density has been given to Neighbourhood centres however there is no incentive for these centres to redevelop to accommodate any residential uses as the carparking has remained basically the same. As most of these neighbourhood centres exist there is no way that any population growth can be accommodated by these areas. It would need to be a significant density allowance and some form of carpark bonus relaxation to provide the driver to make these developments consider redevelopment. Ditto for centre zones. City Plan is conceptually based on development density being concentrated into areas of existing infrastructure & high-frequency public transport, with 80% of area essentially unchanged How much of this targeted area is genuinely available for redevelopment, & not locked-up in strata-titles etc? Has Council addressed the lack of available land in these areas either as Greenfield or brown field land that could be redeveloped to meet the state government target population numbers going forward? It appears that this issue has not been addressed and that population targets cannot be met with available stock.
	Building Height Overlay Map	<ul style="list-style-type: none"> In many cases across the City heights are decreased This seems counter-productive to high order objectives are to increase density within existing corridors and centres. Increased building heights are typically located north-south. This should also spread along key east-west transport linkages, in particular where adjoining high levels of public amenity such as greenspace. Generally speaking, provision of measurements has the potential to reduce to the quality of space within developments – reduced ceiling heights, access to natural lights, spatial variation. Suggest the addition of stories as per some areas within the plan.
	Urban Areas/Settlement, State & Major Road Network, and Greenspace Networks are interrelated.	<ul style="list-style-type: none"> The SFM1- Designated Urban Area, SFM2-Settlement Pattern, and SFM4- Greenspace Network Maps; and the OMN1, OMN2, OMN3 & OMN4 Nature Conservation Overlays overlay corridors at the scale of the entire city. They do not describe that these natural & movement corridors are often in conflict, or that they can detrimentally divide urban settlements. Unless there is an understanding of the nature of the remaining divisions and a commitment by council to those divisions working sustainably there is a risk the fringe of the city may become scattered and dispersed, by layers of mapping, inefficient use of land, and poor infrastructure decisions. The combined effect of nature conservation corridors/ state and major road & rail networks/ and floodplain, may better be understood, by zooming in to each district centre along the Pacific Motorway, and assessing its surroundings. (More detailed corridor maps) There should be equal importance placed on the vision for each of the remaining divided “urban areas”, as well as

		<p>providing the continuous “greenspace” network.</p> <ul style="list-style-type: none"> • Thought also has to be given to traversing the relatively large distances between divided “urban areas”. Otherwise the “joy” of these inter urban “greenspaces” may be diminished by proximity of noisy and polluting high speed “vehicular traffic”. • Mapping should clarify how natural and manmade corridors, have already, and are proposed to “divide” the city. • Mapping could pre-empt solutions to urban areas like Nerang, where this division has greatly inhibited creating liveable places or living with nature. (Noting: The pedestrian experience between Nerang Rail Station and the major township of Nerang could have been along the Nerang River).
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3.0 Summary

We understand that the draft City Plan is the first iteration of a document that seeks to carry the Gold Coast into the future as an active, dynamic and prosperous world class city. We also understand that not all initiatives can be fully captured within the time constraints of the current draft City Plan.

We would greatly appreciate the opportunity to participate in discussions and workshops to compile the next generation of the City Plan in collaboration with Council and other professionals.

We look forward to working with Gold Coast City Council to further investigate opportunities for the City Plan to meet the Strategic Intent and aspirations of the City into the future.

New Infrastructure - Better Amenity - More Desirable - Better Rates

4.0 Future Opportunities for Consideration

Energy Production

Encourage various forms of bio-mass and passive energy production in and around the city as an opportunity to diversify the economy. Buildings could gain bonuses for such. Rejection of the Rocky Point sugar mill bio-mass project was a missed opportunity for the city.

Encourage waste sharing between buildings and industry as a means of minimising energy usage and waste production. *Refer Karlundborg Denmark Industrial Symbiosis.*

Urban Agriculture

Encourage urban agriculture and farming through the provision of section SC 6.5. This has the potential re-focus the local economy on local produce and products that is direct from farm to plate. It is another means of diversifying the local economy whilst also establishing a sense of community and ownership. This may be executed via public spaces, streets or new and existing buildings. This is nothing new, areas still exist within the cities urban footprint, in particular the Merrimac Carrara floodplain sustains existing agricultural facilities. *Refer Michael Mobbs.*

Education & Research

The city now boasts two architectural and various urban planning and design schools. It is an excellent resource in which to test and research ideas and projects that fall under the key strategic directions of the city. It will further encourage diversification of the economy whilst also having the potential to reduce the brain drain of local students who have to leave the city in order to find employment elsewhere.

Project Procurement

Encourage the use of architectural competitions to for key private and public projects within the city. These competitions should not be restricted to established firms but encourage ideas and design as the key assessment criteria. The City of Sydney has in recent years successfully utilised competitions for public and private projects in the city as a means of improving the architecture and urban realms in return for density and height bonuses.

The city should encourage the use of emerging architectural and design practices for city infrastructure such as bus shelters, ablution blocks, public spaces and various council projects.

Intergenerational Homes

Respond to the growing need to allow families to stay in place and homes to adapt. City Plan obstructs the opportunity via density and area and privacy restrictions.

Encourage such development for economic underpinning by small contractors. Reevaluate the impact of density on such small project especially in low res areas. It is no different from a duplex or triplex if well designed, coming into the neighbourhood and should NOT trigger impact assessment.

Community Benefit

Suggest the removal of the requirement for a community safety appraisal when a benefit bonus is sought. The framework set in place by this document and quality design in general will satisfy the requirements of the Crime Prevention through Environmental Design requirements.

Suggest bonuses for more experimental forms of urban amenity, systems and uses including but not limited to urban agriculture and farming; bee hives, green facades and vertical gardens; advanced construction systems and processes; energy production and waste sharing/reduction. This has the potential to diversify the economy, invigorate innovation and interlace with aspects of the cultural development policy.

Suggest significantly increased bonuses for key strategic framework themes. This strategy was implemented in Singapore to achieve the desired outcomes of a garden or biophilic city with substantial bonuses for projects that integrated landscape. *Refer WOHA Architects (below)*

5.0 References

BIOPHILIA

The term "biophilia" literally means "love of life or living systems." It was first used by [Erich Fromm](#) to describe a [psychological orientation](#) of being attracted to all that is alive and vital.^[3] Wilson uses the term in the same sense when he suggests that biophilia describes "the connections that human beings subconsciously seek with the rest of life." He proposed the possibility that the deep affiliations humans have with nature are rooted in our biology. Unlike [phobias](#), which are the aversions and fears that people have of things in the natural world, [philias](#) are the attractions and positive feelings that people have toward certain habitats, activities, and objects in their natural surroundings.

Urbanists and city planners have special opportunities and unique obligations to advance biophilic city design, utilizing a variety of strategies and tools, applied on a number of geographical and governmental scales. The agenda is one that must extend beyond conventional urban parks, and beyond building-centric green design. It is about redefining the very essence of cities as places of wild and restorative nature, from rooftops to roadways to riverfronts. It is about understanding cities as places that already harbor much nature and places that can become, through bold vision and persistent practice, even greener and richer in the nature they contain.

The Nature of Cities is a one hour documentary about the projects and people in cities across the world who believe that, even as we become more urbanized, we must reclaim an essential piece of our humanness - our connection to the nature around us. Amazing projects in cities around the globe have already begun this task. It is our goal to raise the consciousness and understanding of this movement as we explore the need of moving not only to sustainability, but also to a regenerative way of living.

Green MashUP: the rise of biophilic cities



Singapore as a compact city is considered as a world model of a biophilic city as the government invests in extensive park and green areas, elevated walkways and canopy walks. [Image: Tristan Tan/ Shutterstock](#)

In recent years, we have seen a movement towards biophilic cities – ones that incorporate nature into urban design. It is a form of green urbanism where residents see and experience nature in the normal course of work and play, everything from treetop lichen to ecosystems that define the city and give it that distinctive feel.

Biophilia means love of life or a passion for all things living. The term was first used by psychologist Erich Fromm in 1964 to describe an attraction to nature, both human and non-human. The term was popularised by [Harvard University myrmecologist and conservationist EO Wilson](#) to describe the way we are hard-wired to need connection with nature and other forms of life. He says it has to have a genetic basis.

“It’s too universal, and the cultural outcomes of it in different parts of the world are too convergent to simply call it an accident of culture,” Wilson says.

Biophilic cities are different to green cities in which the emphasis is on energy and environmental conservation. In biophilic cities, there is a greater focus on wellbeing and health, celebrating life forms and processes that we as a species have evolved from.

[Biophilic design](#) takes in the environmental features of the built environment, which can include colour, water, air, sunlight, plants, animals, natural materials, landscapes and geology – natural shapes and forms that can include anything from botanical, animal and shell motifs to architecture that evokes emotion in arches and vaults and domes, and simulation of natural features, extending even to biomorphic art, architecture and design.

Biophilic design also includes natural patterns and processes in the landscape, not to mention the historic, cultural, geographic, spiritual, or ecological features of the place. City planners are increasingly taking biophilic principles into account. US city planner Jeff Speck advocates [10 ways to make cities more walkable](#), which include getting the parking right, encouraging a diversity of uses, making cities more hospitable, cycling and planting more trees.