



11 November 2019
City of Gold Coast
PO Box 5042
GCMC 9726

Online submission

Re: Our City Our Plan Amendments

The Queensland Chapter of the Australian Institute of Landscape Architects (AILA) welcomes the opportunity to respond on key amendments to the Gold Coast City Plan

AILA is the growing national advocacy body representing over 3,000 active and engaged landscape architects, promoting the importance of the profession today and for the future. Committed to designing and creating a better Australia, landscape architects have the skills and expertise to solve macro issues with innovative integrated solutions. Landscape architects contribute leadership, creativity and innovation as they strive to collaborate to achieve better health, environmental, social and economic outcomes. From citywide strategies to the redesign of local parks, landscape architects are making places and spaces more sustainable and productive.

AILA's national position statements on [Green Infrastructure](#), [Child Friendly Cities](#), [Future Street](#), [Healthy Communities](#) and [Active Travel](#) all examine how an integrated approach can be used to shape the health and wellbeing of a community. Landscape architecture plays an important role in developing these strategies.

This submission has been formulated by our AILA members at Landscape Architecture practices on the Gold Coast, who interact with the City Plan on a regular basis.

Please find attached the AILA Queensland and particularly our Gold Coast Members' response to **Our City Our Plan Amendments**. We would welcome the opportunity to discuss further, and request that we remain involved in the ongoing development of the City Plan.

Should you have any queries or wish to discuss, please contact Melanie West, AILA Queensland Chapter Manager on 0417 666 622 or melanie.west@aila.org.au

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Uhlmann'.

David Uhlmann
AILA Queensland President



Our City Our Plan Amendments - Response

Theme 1: Height and density - Creating a sustainable city shape

AILA encourages Gold Coast City Council to promote the creation of a sustainable city shape. We believe the changes to redefining building heights to make it easier for the community to understand is a positive change.

Item 1 & 2 - Building height overlay map and new building height categories

We support several proposed height reductions from the intended building heights in the current version of the City Plan (for example in Burleigh Heads District Centre). However, with respect to maintaining local character and protection of landscape values, we would encourage closer consideration be applied to building height and landscape character along the southern corridor. The supporting material solely references The Building Height Study (2017) and is critically lacking in a transparent and rigorous methodology as to how the proposed building heights have responded to sensitive landscape values and view corridors.

It is unclear as to how views to areas of high landscape value (with respect to landscape character and scenic amenity) and important view corridors from Citywide and local viewpoints, which are critical to local and regional identity, will be protected while at the same time allowing or encouraging increases in built form height. We are concerned that, without this link to the supporting studies and data, planning scheme restrictions on built form height may be open to challenge.

In addition to the Building Height Study by Urbis, we are aware of a number of detailed studies of landscape values commissioned by Council, (some multi-award winning) since 2014 that support the proposed restrictions on built form height (and other recommended planning scheme measures) that have not been referenced. We believe the Building Height Study is one of the tools available but should not be used in isolation in determining building height.

This is reiterated in the Our City Our Plan Supporting Documents.

739th Council Meeting 25 July 2017 CONFIDENTIAL City Planning Committee Meeting 19 July 2017

Study limitations The Building Height Study only focuses on the city's building height and does not consider broader planning outcomes such as land use, density, infrastructure capacity and environmental constraints. In other words, it only addresses one component of the broader vision for the future intentional city shape. As presented in Figure 2, the Building Height Study must be synthesised with the outcomes from other existing interconnected land use and infrastructure studies to create an informed single intentional city shape for the Gold Coast.

Interconnected land use and infrastructure studies	Purpose	Status
	REDACTED	

Consequently, it is important to note that the Building Height Study alone cannot form the basis for specific changes to building heights across the city and as such no site specific changes to building height designations will occur as a consequence of this report.

Figure 1 -739th Council Meeting 25 July 2017 CONFIDENTIAL City Planning Committee Meeting 19 July 2017 extract.



Consequently, it is important to note that the Building Height Study alone cannot form the basis for specific changes to building heights across the city and as such no site-specific changes to building height designations will occur as a consequence of this report. (2017 p5 and 6).

It is submitted that these other Council documents and their associated mapping are an integral part in defining the desirable character of the city at both a city wide and centre/local level. If referenced and made available they would be a useful tool for consultants, developers, council officers and the community. At present their omission is glaringly obvious, despite many references from a Strategic Framework level to a Zone Code level on desirable character and the new Site Context and Urban Design Policy proposed in the amendments.

The list of relevant documents includes but are not limited to:

- Scenic Amenity Study RPS 2010;
- View Corridor Study RPS 2009;
- Gold Coast Landscape Character Study 2014;
- Place Study Burleigh Lat 27 2015;
- Place Study Tugun Lat 27 2015;
- Landscape Values Study RPS Cardno 2016;
- Place Study Palm Beach Cardno 2016;
- Place Study Kirra Cardno 2016;
- Place Study Mudgeeraba RPS 2017;
- Visual Impact of Urban Form Study Cardno Trace 2018;
- Site Context and Urban Design Study Cardno Archipelago 2019.

We also note that there have been no changes to the 'Strategic Framework Map 4 - greenspace network' map. It is recommended that 'Citywide features, Citywide landscape character types and Citywide strategic view corridors' which are suggested for consideration in the proposed 'City Plan policy -Site context and urban design report' be clearly defined and identified on this map. This should be supported by a reference document with a rigorous methodology to provide clarity and ensure the protection of important natural features and views critical to the image of the City.

Additional feedback for items 1 and 2 also includes:

- the change in terminology from storeys to an actual height is seen as a positive improvement for consistency and clarity for community;
- significant concern over apparent blanket approach to increased height across suburbs proposed. This seems to contravene key landscape character and heritage principles and recommendations outlined in the Council's award-winning Landscape Character Study work completed in 2014;
- the increase in height and density should also consider strategic land acquisition for separation of private holdings with surety for public access, views and potential for deep planting of large structural vegetation not possible with the site cover and density of development in these areas;
- expanding the Building Height Categories to seven; including the new Low-medium, Medium-high, Tall & Supertall reflects the diversity of built form required within the city. We believe this is a good result to reflect flexibility in the planning scheme.

Item 3 - New Low-medium density residential zone

- The inclusion of Low-medium density within Low or Medium Density provides an added diversity in Built Form while excluding increases in building height allows the scale of these zones to be respected. Exclusion of Low-medium from greenfield zones such as Pimpama and Coomera allows these zones to retain their medium density and expected future population growth between now and 2041.
- The Strategic Framework Settlement Pattern Plan refers to inter urban breaks but only one is shown. The term "inter-urban breaks" should be clearly defined (and 'intra-urban breaks') and measures put in place to protect these breaks. Other inter-urban and intra-urban breaks formed by Critical Corridors (see Item 22) should be added to this strategic framework plan.



Item 5 - Building height changes for limited areas

- As stated previously, we support the height reductions in Burleigh Heads District Centre to ensure the protection of several significant city wide and local views to Burleigh Ridge and the local character of Burleigh Heads.

Item 6 - Building height changes for limited properties

- We believe the reduction in height for Cascade Gardens from undefined height (HX) to 11.5m is a good result. With the expected population growth between now & 2041, open space is at a premium and will require management to ensure open space supports future recreational needs.

Item 7 - Chevron Island zone allocation

- We believe the reduction in height for Chevron Island from undefined height (HX) to height maximum to 33m is a good outcome for the precinct. Good – excludes Light Rail Urban Renewal Zone (Future) and proposes a revision of the Strategic Framework.

Theme 2: Built form and urban design - the importance of a well-designed city

AILA also agrees that built form and urban design are critical to creating sustainable, attractive and liveable cities. We believe the objective to revise and refine current controls to better reflect contemporary architecture and promote good built form outcomes for the City is a great initiative and we commend Gold Coast City Council for this.

The proposed six key design principles introduced into the Strategic framework that requires all future development to be responsive, connected, engaged, sub-tropical, attractive and adaptable is a positive step in the right direction to improve the built form of the City.

Item 8 - Community Benefit Bonus Elements Policy Removal

- Aspiring to and pursuing high quality architectural and urban design outcomes for the City is seen as a key responsibility for the City Plan. Commitment to reliable and consistent architectural project and precinct design review through an independent professional review panel (potentially in collaboration with the Office of the City Architect, AILA and AIA representatives or industry independent peer review panel) may be part of the solution to remedy the identified shortcomings and resulting in the removal of the Community Benefit bonus.
- Extract from proposed changes section on website: “This project has identified that the City Plan is not consistently facilitating well-designed buildings and places, largely due to an absence of clarity regarding built form requirements, amenity considerations and what comprises high quality architecture and urban design”. AILA strongly believes reference to the higher order City planning studies such as the Landscape Character Study, existing streetscape guidelines and future precinct master plans would also support this aspirational outcome.

Item 9 - Built form improvements

- As the new policy promotes smaller site coverage as buildings become taller (i.e. from podium level rather than stepped), the effect for the City is that the smaller boutique developments (often built side by side) will require a greater volume and quality of landscape space and amenity; avoiding the continuous concrete podiums with narrow to no landscape between them in favour of better outcomes. This is a great outcome from a landscape amenity perspective, but will no doubt require developers to purchase multiple blocks to achieve feasibility, so there may be flow on effects as a result.
- Where Development does not push the limits with height; high site coverage is allowable and small landscape buffers to boundary (i.e. 1m) will occur. In these situations; perhaps a built to boundary option would allow a more significant provision of landscape on one side of the podium (i.e. 2m buffer to Southern/Western boundary); achieving a higher level of landscape amenity that is easier to maintain.
- Whilst we support the proposed Site Context and Urban Design Policy, we recommend that the amendments to the ‘Strategic Framework Map 4- greenspace network’ discussed under Item 1 & 2 be undertaken and clearly referenced in this policy.



- We recommend previous studies which define character and landscape values based on an agreed methodology be clearly outlined in this policy as supporting documents, in order to define Council and Community expectations for existing and planned character. These studies include the Council endorsed Landscape Character Study, Place Analysis Studies and other Landscape Values, Scenic Amenity and View corridor studies undertaken for Council. Development applications should be required to respond to these values in their urban design responses.
- Additionally, consideration of the AILA Queensland's ['Guidance Note for Landscape and Visual Assessment'](#) which recently received a President's Award at the 2019 National Landscape Architecture Awards should be referenced. AILA members are currently working to achieve National adoption for this Guidance tool as the primary tool for guidance around Landscape and Visual Assessment. This document provides clear guidance as to how development should respond to site context and take into consideration visual amenity and landscape character.

Item 10 - Changes to communal and private open space

- Plan seeks to reduce Communal Open Space in High-rises/ Multiple Accommodation to 6.5m² per dwelling (reducing from 45m²). This is a significant drop which reduces the available communal open space; thus, diminishing opportunities for social interaction in these settings with potential to put pressure on nearby Public Recreation Open space. This policy should be location specific; allowing reductions in Communal Open Space only when local Public Open Space facilities exist.
- As communal gathering space diminishes, the potential for landscape amenity planting on site reduces.
- Lack of patronage of communal open space ie pools BBQs and recreational areas, often results from poor design resolution. These spaces are commonly located on the southern side of buildings, with no solar access and no views in left over space. There is opportunity for the planning scheme to promote roof top Communal Space with year-round solar access, 360 degrees views and a greater quality of amenity exists.
- Planting/landscape plays a significant role in memory retention, cognitive processes and sense of calm, so with reductions in communal/private landscape; the planning scheme could place more value on streetscape and creating a sub-tropical streetscape that improves user experience while moving through our City.

Item 11 - Existing Light rail urban renewal overlay review

- We believe Landscape Architects can play a key role in helping the development of the urban design guidelines and implore their inclusion to do so. The guidelines should be developed on a precinct scale. Rather than simply commuting infrastructure, the opportunity exists for the Light Rail to be a public realm node activator. Restrictions on planting mature trees in the corridor should also be addressed.

Item 12 - Transport code changes

- Strengthen Traffic Assessment Provisions – clear guidelines regarding street tree planting involving Landscape Architect professional would be welcomed.

Item 13 - Shared access easement improvements

- The reduction of lot numbers that share an access easement will increase the number of single driveways for same number of lots. This will negatively impact the streetscape typology with the reduction of street tree planting numbers. The 'right' example does not show the exact same four lots and how that looks like (i.e. 2 single driveways and 2 access for lots). The easement calculation should not overarch streetscape outcome.

Item 14 - Driveways and vehicle crossings update

- Current City Plan includes setbacks to services, boundaries, driveways and street trees. These are particularly important in residential zones with small lots where driveways, built form and street trees struggle to fit within small frontages. We don't believe the increased separation distances between driveways, vehicle crossing, and other infrastructure elements is always necessary in every situations. For example, in low speed environments, street trees positioned near driveways should be allowed. Canopy cover should be increased not decreased and, in situations where sightline, exclusion zones and separation distances are enforced, often the result is no street



trees as infrastructure always becomes a priority.

- Green infrastructure should be prioritised to the same level as other infrastructure and often exclusion zones and sight distances result in a poor outcome for green infrastructure. AILA also suggests achieving overall precinct canopy targets, an urban forest strategy and believe that trees are a key element for human comfort, speed reduction, pedestrian prioritisation and heat island minimisation.

Theme 3: Targeted growth areas

Item 15 - Identified growth areas

- AILA believes proposed priority growth areas including Southport, Labrador and Biggera Waters should have a precinct master plan underpinning their 5-year growth.

Theme 5: Environment

Item 22 - Environmental mapping

- A map review indicates substantial change in the categories of recognition and importance of the City's vegetative structure. Significant areas mapped within the City's identified 'critical corridors' are proposed for reduction which may further fragment corridor integrity. Close review and analysis are recommended to prevent this outcome. AILA would encourage Council to maintain and strengthen rather than reduce the mapped environmental significance assigned to vegetation across the City areas.
- In addition, close attention should be paid to coordinating with adjacent Local Authority borders/areas with the recognition that the broader landscape and landform ecological frameworks and structures transcend Local Authority boundaries. AILA would encourage closer engagement with State Authority-controlled vegetation for a co-ordinated effort in the protection and enhancement of the integrity of natural systems, critical to the liveability and character of the City.
- This aspect is critical with the proposed expansion of the heavy rail stations as part of the Cross-River Rail projects and the M2 road network alignments. Council should ensure that strong representation is made regarding identified city vegetation for protection and enhancement of the green infrastructure in the negotiation and construction of these works.
- The Strategic Framework Settlement Pattern Plan refers to inter urban breaks but only one is shown. The terms "inter-urban breaks" and "intra-urban breaks" should be clearly defined, and measures put in place to protect these breaks.

Item 23 - Rural and Rural residential landscape and environment precinct

- The response to submissions from the community requesting a holistic review of the Rural and Rural residential landscape and environment precincts is positive. The review undertaken to refine the mapping methodologies used to determine what specific on-site environmental and landscape values is welcomed.

Item 24 - Healthy waters code

- Greater coordination is required to support a holistic approach management of the City's waterways. In relation to the erosion/stormwater management/fish passage, natural waterways the current split responsibility waterway management model (State Departments, Police, Waterways Authority and Council as referral agencies) requires more consistency. These systems need a coordinated City led pro-active approach that considers all aspects of waterway management covering erosion protection/stormwater management, native flora and fauna protection within the waterway corridors, marine craft/waterway use, pontoons and structures in the waterways and flood management and mitigation.



Theme 6: Other land use changes

Item 34 - Changes in response to Ministerial Conditions – The Spit Master Plan

- We believe the inclusion to recognise the recently adopted Spit Master Plan regarding building heights to provide greater certainty to the community and industry about the expected mix of uses, development intensity and character of development is a positive inclusion.