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Dear Sir/ Madam,

**DRAFT SHAPING SEQ 2023 UPDATE SUBMISSION
DWELLING SUPPLY & HOUSING AFFORDABILITY ISSUES ON THE GOLD COAST**

This is a submission made to DSDILGP in relation to the public advertising of the draft Shaping SEQ 2023 (draft SEQRP), which is submitted on behalf of Zone Planning QLD.

This submission has a Gold Coast focus and in particular looks into what draft Shaping SEQ 2023 is doing differently to respond to the current dwelling supply and housing affordability crisis currently unfolding in the City.

Upon detailed review of the document, the conclusion reached is that draft Shaping SEQ 2023 is doing very little to address current and ongoing issues of dwelling supply and housing affordability on the Gold Coast, and it is strongly suggested that more bold and assertive measures need to be undertaken by the Queensland Government to address the current housing crisis.

Given that the review of the SEQRP was brought forward in response to the current housing crisis, it is disappointing to see that the document shows little or no urgency in changing the status quo, which is clearly not working.

A full and proper review of SEQRP in a time of housing crisis offers the opportunity for fresh thinking and decisive action to implement effective solutions, however sadly this opportunity has been overlooked to date, and the likely outcome is that the crisis will continue to get worse until more decisive action is inevitably taken.

We urge the Queensland Government to take more wide-ranging and decisive action through the SEQRP review to address the current housing crisis in the City of Gold Coast.

THE CURRENT HOUSING SUPPLY PROBLEM ON THE GOLD COAST

The draft Shaping SEQ 2023 mentions on numerous occasions that SEQ is currently experiencing a severe shortage of housing supply including rental supply, which is widely referred to as a crisis.

It is clearly evident in the City of Gold Coast that the following is occurring in relation to dwelling supply:

- There is very limited unconstrained greenfield housing land remaining in the City, and the land that does remain is concentrated in very few hands. Approximately half of the greenfield dwelling supply in the City is located in three developments being the *Skyridge* project at Worongary (under construction), the *Coomera Woods/ Polaris* site at Coomera (currently subject to an EPBC Koala assessment) and the *Calypso Bay* development at Jacobs Well (under construction).
- Large amounts of zoned greenfield land within the SEQR Urban Footprint are subject to flooding or environmental controls, or both, and hence is undevelopable. The Department's own investigations elsewhere in SEQ have confirmed this to be the case, and the situation is no different on the Gold Coast.
- Large amounts of zoned greenfield land in places like central Coomera and Pimpama are contained within the High Density Residential Zone and Centre Zone and are subject to building height and residential mapping which hypothetically caters for very high intensity development, when the reality is that economic conditions are very unlikely to support this scale of development in this location for the foreseeable future. For example, 17-storey towers are envisaged on Centre Zone sites in central Coomera. Consequently, the dwelling supply capacity of the Urban Footprint in the Gold Coast expansion area has been grossly inflated and exaggerated by assumptions of high density greenfield tower development, which is very unlikely to be realised because it is economically unviable to do so. This approach to measuring greenfield dwelling numbers disguises and obscures the real availability of land in the City for low rise/ low density traditional housing product. True greenfield land available for 2-storey housing product is in very short supply.
- Building costs generally, but specifically for residential tower product, are escalating rapidly, and there are only two top tier apartment tower builders operating in the City (Multiplex and Hutchinsons), with financial institutions losing confidence in second-tier builders due to recent building company collapses. As a consequence, the vast majority of tower projects in the City are for very expensive high end apartments, which can be sold at premium prices which exceed escalating construction costs. This situation is likely to continue for the foreseeable future.
- Virtually no affordable apartment product (whatever 'affordable' is deemed to be defined as) is being constructed in the City at present. It is also well known that 'slab on ground' development for detached houses or townhouses in a greenfield setting can be provided to the market at a much lower price per square metre, than can apartment product, but there is very little of this stock available.
- The City has virtually no affordable 'missing middle' product of any significant quantity, because there is insufficient 'constraint free' zoned land to accommodate such development. Such land is

generally extensively flood affected or contained in a fragmented land ownership pattern. Additionally, because infill sites have increased in value due to lack of supply, it is generally prohibitively expensive to amalgamate older housing lots to combine into larger development sites, and where occurring, cannot deliver affordable housing supply due to the expensive land component.

- Rental vacancy rates in the City are less than 1%, leading to strong competition for available rentals, and a steep escalation in rental rates. If rental vacancy rates are easing slightly, it is probably because the ability of the rental market to pay escalating rents has ‘topped out’.
- Homelessness in the City is increasing, and it is clearly evident that ever increasing numbers of low income earners are living in campervans and tents throughout the City. Homeless camps are appearing in locations around the City, where no such camps previously existed.
- Within this backdrop, Gold Coast City Council intend to continue to present the State with amendments to the 2016 City Plan through Amendments 2 & 3 which will result in a net loss of future dwellings to 2041, contrary to the direction of SEQRP. We urge the Minister to refuse any amendment which seeks to reduce future dwelling supply in the City.
- Anecdotal evidence from charitable organisations such as the Salvation Army, indicates that new residents moving to the Gold Coast (approximately 15,000 per annum) generally have the financial means to afford housing. It is unlikely that new interstate and international residents are moving to the Gold Coast to be homeless. As such the ‘losers’ (for want of a better term) in the competition for available housing supply (both to purchase and to rent) are overwhelmingly likely to be low and middle income Gold Coast locals. These are people who have probably lived in the City for a substantial period of time and are unwilling or reluctant to leave to find more affordable housing locations elsewhere in Australia, because the Gold Coast is their home. As these people are pushed out of the housing market, they add to the homeless community in the City, including the phenomena of ‘working homeless’, being those who have employment but are forced to live in a vehicle, campervan or tent, typically in a discreet manner.
- The Australian Labor Party currently hold power in Queensland and have done so for a substantial period of time over the last 30 years. Low and middle income Queenslanders are the ALP’s core constituency. By depriving low and middle income earners of affordable housing in South East Queensland, through the imposition of constraints which impede the market’s ability to supply housing to meet demand, the current Queensland Government is failing its core constituency. It is clear that those Queenslanders with the lowest financial means are, and will continue to be, displaced from the housing market if the current situation continues. Having access to appropriate shelter is surely a core human right which is being denied to a large number of Queenslanders through planning related market intervention including the SEQRP Urban Footprint and restrictive Local Government zoning controls. This needs to change if we are to address this problem in a comprehensive manner.
- Against this backdrop, the recently released Queensland Government population projections indicate that the Gold Coast will need to accommodate somewhere between 215,000 and 495,000

additional residents in the next 23 years. Figure 4 on Page 68 of the draft SEQRP assumes that 381,200 new residents will live on the Gold Coast over the 2021-2046 period, requiring the construction of 158,100 dwellings.

- It is also reported that Queensland currently has a public housing waiting list of approximately 40,000 people (the equivalent of the population of Gympie). There is very little public housing being constructed in the City of Gold Coast, and while there is certainly a need for large numbers of new public housing in the City, it is apparent that Government cannot solve this housing crisis themselves given that the private sector constructs 97% of all new dwellings in Australia. The expertise of the private sector will need to be harnessed to construct the future supply of dwellings necessary to accommodate future population growth in the City, and that will require a significant reduction of market interference in the planning system by Government policies, including the SEQRP.

DRAFT SHAPING SEQ'S RESPONSE TO THE HOUSING CRISIS ON THE GOLD COAST

Generally speaking, the draft Shaping SEQ document seeks to respond to housing crisis facing the Gold Coast in the following ways:

- **No Expansion of the Urban Footprint for Residential Purposes**
Despite ample evidence that greenfield development provides the most affordable housing options for home purchasers, the draft SEQRP provides no greenfield residential expansion on the Gold Coast. This position is taken on the assumption that *'urban sprawl leads to bad outcomes for people and the environment'* and results in inefficient and uneconomic utilisation of urban infrastructure. It is however the case that to a large degree, whether inside or outside the Urban Footprint, constraint mapping relating to natural hazards such as flooding and environmental protection issues, dictates whether land is able to be developed or not. To a large degree on the Gold Coast, the Urban Footprint boundary is redundant, and only serves to prohibit a development application from being lodged in circumstances where flooding and environmental mapping determines the real development outcome in any event. There is a substantial quantity of land located just outside current Urban Footprint boundaries in the City, which is neither flood affected or subject to significant environmental constraints, does not have fragmented ownership, and which is in close proximity to a wide range of urban services - much of which has spare capacity. A recent submission from Saunders Havill Group titled *'Advocacy Report - Kingsholm Growth Corridor'* (**refer to Attachment #1**) estimates that there is sufficient unconstrained land for a further 15,000 dwellings in the Pimpama/ Ormeau/ Kingsholm area of the City alone. There is no doubt similar additional supply in other areas of the urban periphery of the City. In previous iterations of the SEQRP the State has included greenfield expansion in the City where it makes sense to do so. It makes sense to do so now to satisfy an urgent need, and we urge the State to look more closely into this issue as part of this review process.
- **Retention of the Southern Inter Urban Break**
The Southern Inter Urban break provides a narrow east-west gap in the SEQRP Urban Footprint generally between Pimpama and Ormeau in the northern part of the Gold Coast LGA. Unlike the

Northern Inter Urban Break, the Southern Inter Urban Break is not actually a true Inter Urban Break. It provides a small gap in linear suburbia along the M1/ Gold Coast railway corridor that is largely imperceptible to those who travel through it. This is particularly the case for M1 motorists who are largely hemmed in by acoustic barriers and dense verge vegetation. The Southern Inter Urban Break also accommodates a river which is no different to a number of other east-west river corridors in the City which do not have an Inter Urban Break designation. It also has no scenic amenity value of any great significance and is not actually a boundary between the Gold Coast and Logan LGAs – that boundary occurs to the north at Yatala where the urban areas of both LGAs merge together. What the Southern Inter Urban Break does have however, is a significant supply of flood free developable land, in large rural zoned titles, with no significant environmental constraints. Such land is located close to a wide range of existing urban infrastructure such as a sewerage treatment plant, schools, roads, railway stations, shopping centres and other urban amenities, much of which has spare capacity. In light of the current dwelling supply crisis it is strongly suggested that the time is now right to dispense with the obsolete notion of a Southern Inter Urban Break which is not actually a true Inter Urban Break in any event.

- **Exclusive Reliance on Urban Consolidation**

The 2023 Queensland Government Population projection indicates that the Gold Coast is expected to have a population increase of between 215,000 and 495,000 people in the next 23 years. Figure 4 on Page 69 of the draft SEQRP states that the City's 2021 population was 633,800 and that the estimated 2046 population will be 1,015,000 – **an increase of 381,200 or 15,000 people per annum over a 23 year period**. Figure 5 on Page 77 of the draft SEQRP states that an additional 158,100 dwellings need to be built on the Gold Coast between 2021 and 2046 to house the estimated population growth, representing **6324 new dwellings per annum** at an estimated 2.4 person per dwelling occupancy rate. Overall, the Draft SEQRP states that an additional 900,000 dwellings (or 34,500 per annum) are required in SEQ to 2046. To get some measure of the scale of this undertaking, Gold Coast City Council in their recent Amendment 2 & 3 package (which was considered and declined in part by the Minister), proposed an additional 7,100 dwellings to 2041 in the Southport/ Labrador /Biggera Waters 'targeted growth area' generally surrounding the Southport CBD. This population growth figure was promoted in the absence of an LGIP amendment which identifies how water and sewer infrastructure will be provided to facilitate this growth and hence there was no certainty that infrastructure could support this increased population, or that the estimated population was actually achievable. In other words, the task of accommodating the expected growth into the future on the Gold Coast is enormous, most of which is assumed by the draft SEQRP to occur within residential towers, which is an inherently expensive way to house people. The vast majority of future residents, including anyone on a low to medium income, will not be able to afford to live in a new apartment building in the City. This then poses the question; *'where will low to medium income earners be able to afford to live on the Gold Coast in the future?'* The draft SEQRP sadly does not provide an answer to this question.

- **Removal of Clear Consolidation and Expansion Dwelling Supply Targets for the Gold Coast**

The previous 2017 iteration of the SEQRP identified that the City of Gold Coast needed to provide 158,900 additional dwellings in the period between 2016 and 2041 (ie a 25-year period). This equated to 6,356 dwellings per annum. Of the 158,900 projected dwellings 127,900 were anticipated to occur within the distinctly mapped 'consolidation' area, while 31,000 were

anticipated to occur within the 'expansion' area, catering for greenfield development. An 80% consolidation / 20% expansion split was identified in the 2017 SEQRP.

Moving forward to the current draft SEQRP, the document on page 77 identifies that an additional 158,100 dwellings are anticipated to be required within the 25-year period between 2021 and 2046. A specific consolidation versus expansion target for the Gold Coast (or other LGAs) does not appear in the draft SEQRP however, the pie graph on Page 77 refers to an overall 32% expansion / 68% consolidation outcome for the whole of SEQ.

With regard to the expansion area on the Gold Coast, in July 2023 Zone Planning Group, in conjunction with Zone Landscape Architecture, Biome Environmental Consultants and Matusik, produced a Greenfield Dwelling Supply Report (refer to **Attachment #2**) which examined the realistic dwelling supply within this distinctly mapped area in the SEQRP. This involved removing land which has exposure to natural hazards, and also removing land which has constraints associated with environmental mapping at the State and Local level. The report identified that in April 2023 the expansion (or greenfield) part of the City had capacity to accommodate approximately 17,500 dwellings, of which approximately 10,500 dwellings have a high chance of being developed by 2041. The reduced number of dwellings with a high chance of occurring, relates to the fact that the market is unlikely to be able to accommodate high density residential development (ie 17-storey apartment buildings in central Coomera) to 2041, despite the 2016 Gold Coast City Plan facilitating this outcome. The market will logically construct housing to the highest density the market will accept at any given time to 2041, which is highly likely to be much less than the 2016 Gold Coast City Plan anticipates.

We contend that there is very little expansion land within the SEQRP remaining in the City, and particularly land which can accommodate lower density, more affordable housing product such as dwelling houses, townhouses etc which are typically no more than two storeys in height.

The draft SEQRP appears to be walking away from the provision of a diversity of dwelling supply on the Gold Coast, by making no further provision for further low rise/ lower density/ more affordable housing product in the City, in a manner which is able to be provided 'at scale'.

The draft SEQRP sets a target of an additional 158,100 dwellings over the 2021-2046 period (which is remarkably similar to the 158,900 dwelling target identified in the 2017 SEQRP for the 2016-2041 period), but does not set a 20% expansion target as the current SEQRP document does.

Even if a lower 15% expansion target were to be adopted, this would result in the need for 23,715 new greenfield dwellings in the 2021-2046 period, whereas the abovementioned report identifies that there is insufficient capacity in the SEQRP Urban Footprint expansion area to accommodate those dwellings.

While it is acknowledged that a physically constrained City such as the Gold Coast cannot expand forever, and will eventually exhaust all developable land, the City has not yet reached that point and there remains a substantial quantity of developable land on the periphery of the existing

Urban Footprint that could easily accommodate thousands of additional low rise dwellings in areas which have existing urban resources which have significant spare capacity.

- **No Housing Supply Statement or Net Residential Dwelling Targets required for Scenic Rim LGA**
While this submission presents a case that the Queensland Government needs to expand the SEQRP urban footprint on the Gold Coast; irrespective of this, there needs to be recognition in the document that low and middle income earners will lead a 'flight to affordability' and will commute to wherever affordable land and housing is available. In the SEQRP period to 2046 it will be increasingly the case that the only affordable greenfield land for the construction of low rise development will be west of the ranges, and in the context of the Gold Coast, that means Scenic Rim LGA and specifically places like Canungra, Jimboomba and Beaudesert. It is already the case, and will be increasingly so in the future, that rapid urban expansion will occur in these centres. Consequently, it is considered to be counter intuitive that Page 78 of the draft SEQRP exempts Scenic Rim Council from providing a housing supply statement, and that Page 74 of the draft SEQRP exempts Scenic Rim Council from the residential density targets of 20/30 dwellings per hectare. It is also very hard to believe that **only 8,000 additional dwellings** are anticipated to occur in the Scenic Rim LGA to 2046, being a total of **347 dwellings per annum**. We contend that this urban growth has been significantly understated in the draft SEQRP document, and that it is inevitable that large areas of housing land and better transport connections will be required to provide a supply of affordable housing for low to medium income earners in close proximity to the Gold Coast. It is currently a 50-minute drive from Beaudesert to Nerang and we contend that there will be many low to middle income earners who will be prepared to make that commute because they have no other affordable option. It also appears to be the case that the draft SEQRP makes no allowance for future industrial workers in the Bromelton industrial area which is promoted in the draft SEQRP. If this industrial precinct is to prosper it will require convenient access to an industrial workforce, and that means such growth will need to be catered for in the Beaudesert area.

We urge the Queensland Government to require that Scenic Rim LGA prepare a housing supply statement and to also be subject to net residential density targets to ensure newly developed greenfield land is used efficiently. We also urge a fresh consideration of future dwelling targets to 2046 in the Scenic Rim LGA which appear to be unrealistically low, and an acceptance that significant population growth in these areas is inevitable.

- **Foreshadowed Expansion of the Urban Footprint for Industrial Purposes at Stapylton**
Page 231 of the draft SEQRP discusses a 'Potential Future Growth Area' on the eastern side of the M1 corridor at Stapylton and is intended to accommodate industrial activities. While this initiative is welcomed, there is a shortage of industrial land in the Yatala area now that would justify inclusion of this land in the SEQRP Urban Footprint immediately. Additionally, the State are aware that Logan City Council recently increased the Q100 flood level for a number of their river catchments by between 1.6m and 2m last year. While detailed information has not been forthcoming from Logan Council regarding their intentions for the remaining catchments, it must be assumed that they also intend to make similar Q100 increases to those catchments. The consequence of this change is that large areas of industrial land in Logan have been sterilised and are now undevelopable. This has increased development pressure on the flood free Yatala industrial area to accommodate future industrial growth. Additionally, the draft SEQRP document

fails to recognize that an affordable housing supply needs to be provided for low and middle income earners in close proximity to existing and future industrial areas, or the various industrial operations will not be able to source an industrial workforce. At present, the most affordable new housing supply is located at Yarrabilba, which is a 50-minute drive from Yatala.

- **Introduction of Gentle Density and Dwelling Diversity Targets**

The term 'gentle density' is effectively a rebranding of the previous SEQRP term 'missing middle' and appears to relate to the notion of compressing more residential dwellings within established lower density suburbia. This is a welcome initiative that is supported, but in order to be effective, needs to be backed up through mandatory directives contained in the Queensland Planning Regulation to ensure that Planning Schemes for LGAs implement these measures. In considering this issue, the following matters should be taken into account:

- 1) The current minimum lot size in the Low Density Residential Zone (LDRZ) on the Gold Coast (where not a corner site) is 600m². This is the same minimum lot size that was applicable 50 years ago. There are many sites in the City which are 700m² + which could be redeveloped for more than one dwelling. Given the housing crisis is a Queensland-wide issue, it is suggested that the Minister for Planning should amend the Queensland Planning Regulation to set a default 350m² lot size across the state of Queensland in the LDRZ. This measure would avoid inconsistencies between various LGAs and unlock infill supply throughout SEQ - not just on the Gold Coast.
- 2) Much of the LDRZ land in the City of Gold Coast is flood affected; some in a minor way and some in a more significant way. The consequence of this is that higher construction costs are incurred in achieving the necessary flood immunity, and in some cases expensive Flood Evacuation Management Plans (FEMPs) are required by Local Governments so as to de-risk themselves from the implied risks associated with flooding issues. Under the 2016 Gold Coast City Plan (v10) compliance with the City Plan Flood Code is required for Dwelling Houses, Dual Occupancies and small Multiple Dwelling developments. The Flood Overlay Code is not an overlay which is exempt in relation to the provision of housing under the recent amendments to the Queensland Planning Regulation. The point being made is that not all LDRZ land in the City will be suitable for consolidation due to this important constraint and any estimates of future dwelling supply delivery need to take this important constraint into consideration.
- 3) To the best of our knowledge, no detailed planning study has ever been undertaken in relation to the optimum capacity of the LDRZ in the City, because Council's policy was not to facilitate consolidation in these areas. Given the inherently fragmented nature of this land use Zone, and the constraints applicable to large parts of the Zone, it is unlikely that a 'gentle density' approach in the LDRZ will produce a large proportion of the 158,100 dwellings foreshadowed for the City in the period to 2046. As a point of reference, if the Southport/ Labrador/ Biggera Waters targeted growth area (which could not be accurately described as being 'gentle density') can only accommodate 7,100 new dwellings to 2041 (noting that no LGIP amendments are proposed which identify how infrastructure will support this increase in population), then it is unclear how a significant proportion of the anticipated 158,100 dwellings to 2041 will be achieved through a 'gentle density' approach. A realistic assessment

needs to take place to confirm exactly how much dwelling growth can be expected to occur in the City's middle and outer ring suburbs. We respectfully suggest that this will be a relatively modest portion of the overall 158,100 dwelling target that the State are anticipating in the draft SEQRP document.

- **Foreshadowing of the introduction of Inclusionary planning principles**

Page 87 of the draft SEQRP includes the following statement:

'Inclusionary planning can be used as a mechanism to locate affordable housing in areas that have better access to amenities, education, employment and public transport. Further it can be used to address gaps in market supply and involves transferring some of the costs of social and affordable housing to developers with the objective that they internalize a portion of the social costs of housing affordability.'

Inclusionary planning can also be used to enable affordable and social housing to be located in areas that have better access to amenities, education, employment and public transport'.

The Queensland Government should exercise extreme caution in relation to any proposal to move forward with any mandatory system of shifting the responsibility for provision of affordable housing across to the private sector. The development industry did not cause the current unaffordable housing supply situation in SEQ, nor can they be blamed for the lack of social housing in SEQ.

The current situation has arisen due to the outsourcing of public housing by Government to the private rental market over many decades, relying on housing investors to supply affordable housing to the community; along with constraints to the housing market caused by Government intervention in the efficient supply of housing through planning instruments such as the SEQRP and various Planning Schemes for LGAs.

The development industry did not create this problem and they should not be expected to fix it through mandatory inclusion of social or affordable components to any new private sector development. If however, the Queensland Government wants the private sector to construct a component of affordable housing within new housing developments, then such an approach should be voluntary, and be accompanied by development incentives which allow the financial viability of such projects to be recalibrated to maintain profitability.

Mandatory imposition of inclusionary planning principles risks unintended consequences similar to those which have arisen in relation to Queensland's proposed national land tax approach, and discussion about caps on private sector rental rates. If mandatory inclusionary planning principles are introduced, the unintended consequence may be that new development is rendered unviable, and hence no new dwelling stock will be introduced into the market. This will push real estate and rental prices even higher and erode affordability. We urge the Queensland Government to seek expert economic advice on this issue and to incentivise the development industry to provide social and affordable housing on a voluntary basis in return for planning dispensations such as additional building height, residential density, infrastructure charging discounts or Code Assessable rather than Impact Assessable level of assessment.

Similar measures have been recently introduced by the NSW Government in relation to State significant development, where a 30% increase in building height, residential density and floor space ratio is allowed for, where 15% of proposed dwellings are 'affordable'.

SPECIFIC COMMENTS ON THE 'SOUTHERN SUB REGION' COMPONENT OF THE DRAFT SEQRP

The 'southern sub region' is an SEQRP term which refers to the City of Gold Coast, which is discussed on pages 224 to 234 of the draft SEQRP document.

While this section of the document is significantly similar to the 2017 SEQRP document, commentary on specific points of relevance to dwelling supply is as follows:

Page 226 – Growth by Consolidation

The regional comments for the Gold Coast, similar to the whole draft SEQRP document itself, assume that almost all future growth will occur via consolidation. As discussed previously there is no discussion of greenfield expansion in the City, even though constraint-free land opportunities exist, and the low rise/ lower density development is clearly contributing to dwelling diversity and housing affordability in the City. This 'all eggs in one basket' approach to future growth is considered to be flawed.

Gold Coast High Amenity Areas

Page 226 discusses a number of 'high amenity areas' (being a defined term in the document) within which urban consolidation and higher densities will be supported by the State. These include the Stage 1 and Stage 2 light rail corridors, Bundall, Coomera, the Stage 3 light rail corridor (under construction) and Stage 4 (planned) light rail corridor, Gold Coast health and knowledge precinct, Robina, Varsity Lakes, areas adjoining the Coomera Connector, areas adjoining 2032 Olympic Games sites, areas surrounding HOTA and areas surrounding the Greenheart.

While efforts to achieve further urban consolidation in these 'high amenity areas' is supported, the process for implementing changes through the 2016 Gold Coast City Plan occurs at a 'glacial' pace and it can take five years for planning measures to be implemented, following which they are often revealed to be obsolete. Given the rapid growth of the City, the planning amendment process is frequently out of step with real events on the ground, as is the case at present.

There is a desire from the development industry to consolidate these areas and construct new dwelling supply, provided that it makes economic sense to do so.

Given that we have a housing crisis unfolding right now, with no end in sight, the SEQRP's support for consolidation in 'high amenity areas' will not achieve any change in the short to medium term without some radical intervention from the State. As an example, we note that the Stage 3 light rail project is currently under construction and will be completed by 2024. Council have not yet fully commenced a planning process to amend the 2016 Gold Coast City Plan to densify this corridor, even though it is a requirement of the Stage 3 light rail 'Infrastructure Australia' business case to do so. Based on the current plan making schedule, it is unlikely any amendments would be implemented before 2025.

There is no valid reason why planning changes should not be implemented now, to enable an appropriate residential consolidation process to occur immediately.

This could occur immediately via a Ministerial TLPI, or a direction to Council to produce a Council initiated TLPI within a quick timeframe. Every year that passes without the inevitable rule change being implemented, results in under-development of residential sites which are then unlikely to be more intensively redeveloped for a further 30 years.

We urge the State to take decisive action to implement measures to facilitate this urban consolidation ASAP.

Coomera Connector

Page 226 refers to the Coomera Connector motorway and states that it will:

‘..... improve connectivity on the northern Gold Coast and support opportunities for increased residential densities along the corridor where accessibility is enhanced’.

The recently completed report prepared by Zone Planning Group (refer to **Attachment #2**) identifies that greenfield sites along the Coomera Connector route are largely exhausted, and that the central Coomera area (near Westfield and the Coomera railway station) already has very generous residential density and building height controls, which are considered to be unrealistically high because the market is unlikely to want to build 17-storey high rise buildings at Coomera within the lifespan of the draft SEQRP. Further increasing planning controls relating to residential densities in central Coomera will not achieve any tangible benefit because these densities are far ahead of what the market is likely to accept in this location for the foreseeable future.

What is needed in the Coomera/ Pimpama/ Ormeau area along the Coomera Connector route is additional greenfield expansion onto flood free and environmentally ‘low status’ land which will improve connectivity and enhance accessibility. Saunders Havill through their ‘Advocacy Report – Kingsholm Growth Corridor’ document (refer to **Attachment #1**) have identified that up to 15,000 new dwellings could be established in this corridor if the State were to change the SEQRP Urban Footprint boundary to accommodate it. As discussed previously, the area in question is already rich in urban resources such as a sewer treatment plant, private and public schools, railway stations and shopping centres which in many cases are under capacity.

The imminent construction of the Coomera Connector reason is a further reason to increase the greenfield land supply in this locality and dispense with the obsolete notion of a Southern Inter Urban Break.

Oxenford and Parkwood ‘Growth by Expansion’

Page 228 of the draft SEQRP identifies Council initiated investigations at Oxenford and Parkwood as examples of ‘growth by expansion’. Both of these projects are case studies in the difficulties associated with achieving higher residential densities in peripheral Rural Residential areas in the City and elsewhere. It is inevitable that public consultation in these areas will determine that half the existing

residents want no change, so as to continue to enjoy a semi-rural amenity, while the other half will be open to change including increased densities. The inherent fragmentation in ownership in these locations will result in differences in opinion and political compromises which do not achieve the intended outcomes with regard to achieving large quantities of additional dwelling supply in a short period of time.

Focusing expansion efforts on larger Rural zoned properties on the existing urban periphery, where land is flood free and free of environmental constraints, it more likely to add affordable housing supply in a shorter period of time, due to the fact that fragmented ownership does not exist and agreement on the best way forward is more likely to occur.

While we should not shy away from efforts to consolidate the existing urban footprint in areas like Oxenford, Parkwood and elsewhere, we should also acknowledge that those efforts are politically divisive and very time consuming and hence are unlikely to address the dwelling supply crisis in a timely manner, or deliver the dwelling supply yield that may be initially proposed.

Yatala/ Stapylton/ Beenleigh Regional Activity Cluster

Pages 228 and 229 of the draft SEQRP discuss the importance of industrial expansion and job creation in this locality. We simply reiterate our earlier points in relation to this issue, being:

- **Affordable Housing for Industrial Workers**

It will be difficult for this economic cluster to reach its full potential if low to medium income earners cannot afford to live anywhere near this location. The Draft SEQRP neglects to address this issue, and an expansion of the urban footprint should be on the table for consideration if an affordable housing supply is to be provided into the future. The alternative will be a 50-minute drive to Yarrabilba.

- **Impact of Logan Council Flood Level Increases on Land Supply**

The Department needs to take into account the 1.6m to 2m Q100 flood level increase Logan Council have recently implemented. This has had the effect of sterilising a significant quantity of both industrial and residential land, which was previously situated above the Q100 flood level. The removal of this land needs to be factored into estimates of industrial land supply at Yatala, and also estimates of affordable dwelling supply for the industrial workforce required to service the Yatala industrial area.

- **Rural Prosperity/ Queensland Harness Racing Facility**

Page 231 of the draft SEQRP discusses support for rural industries including the sugar cane industry in the Woongoolba/ Norwell/ Gilberton/ Alberton area. The document does not however discuss the recently announced Queensland Harness Racing Facility at Norwell which will take 72Ha of sugar cane out of production, and whether this reduction in supply will place the Rocky Point Sugar Mill in economic jeopardy or not. An examination of the impact of this new facility on the Rocky Point Sugar Mill needs to occur urgently.

Inter Urban Break

Page 233 of the draft SEQRP states that:

'The Brisbane – Logan- Gold Coast inter urban break, centred on the Pimpama River – Hotham Creek, will be retained as a regionally significant green break providing open space, environmental values, amenity and other non urban landscape values between major urban areas.

The inter-urban break protects part of a strategic corridor and supports rural production and outdoor recreation opportunities'

As discussed previously in this submission, the reality in relation to the land in question is somewhat different to that portrayed in the above statement, in that:

- The land in question is between 3-5 kms in width.
- The land does not separate different LGAs or distinctly identifiable areas within SEQ but is instead a small gap in the suburban M1 corridor within the City of Gold Coast.
- The area is bisected by the M1 motorway, the Brisbane-Gold Coast railway line and the soon to be constructed Coomera Connector motorway.
- An existing Ormeau railway station is located within the area in question. It is standard procedure to focus urban densities around railway station locations.
- The area has access to a wide range of urban resources with spare capacity including a waste water treatment plant.
- The area contains large tracts of flood free land, clear of significant environmental constraints, which based on the referenced Saunders Havill report could contain up to 15,000 dwellings.
- The corridor contains no significant State mapped environmental attributes.

We urge the State to reconsider support for the Inter Urban Break for the abovementioned reasons, and in light of the fact that there is an ongoing dwelling supply crisis in the City.

RECOMMENDATIONS

1) Expand the supply of constraint free greenfield land on the Gold Coast

Page 71 of the draft SEQRP states that:

'Due to necessity, with no further options for expansion land, Brisbane and the City of Gold Coast achieve significantly higher density (attached product) than the rest of the region'.

We contend that this statement is not correct.

There is constraint free greenfield land around the eastern, northern and western periphery of the existing urban footprint boundary in the Coomera / Pimpama/ Ormeau area and at Jacobs Well and elsewhere. There are clearly further options available for expansion land in the City of Gold Coast, if the Queensland Government is willing to transparently examine those options.

It is apparent from an analysis of aerial photography and flood mapping that there are cleared, flood-free Rural zoned landholdings outside the current urban footprint which could be added into the potential land supply of the Gold Coast, through the expansion of the SEQRP Urban Footprint.

It should be again reiterated that the inclusion of land in the SEQRP Urban Footprint does not automatically mean it will be developed, but simply that a development application could be lodged (as opposed to being prohibited). Any land added into the Urban Footprint still needs to go through a rigorous assessment of environmental constraints, flood/ natural hazard constraints and infrastructure provision issues.

If the Minister so wished, he could not only expand the SEQRP Urban Footprint designation, but could also place future residential land in an appropriate land use zone (the Medium Density Residential Zone would be most suitable) to enable a development application to be lodged as Code Assessable. Doing so would in no way undermine or diminish consideration of the various State and Local environmental mapping overlays or any other mapping overlays relating to natural hazards such as flooding or bushfire.

Evidence of this is the fact that there are sites which are currently located within the SEQRP Urban Footprint, and zoned Medium Density Residential (such as the 4Ha site at 13A Labassa Lane, Pimpama) which are subject to environmental and flooding overlays and are essentially undevelopable.

Contrary to statements contained in the draft SEQRP document, urban expansion can actually fund the enhancement of environmental values in a greenfield context. A prominent example is the *Gainsborough Greens* development to the north of Yawalpah Road Pimpama, where the State has previously expanded the Urban Footprint to cater for urban development on the former Gainsborough Greens golf course site. The economic value derived from the urban development in this locality allowed Mirvac to fund a significant environmental rehabilitation program, which would not have otherwise occurred because there was no economic incentive to do so. The area in question now houses a significant koala population which was not originally located on the site. Similar outcomes can be achieved on other nearby sites if the SEQRP Urban Footprint designation was expanded, and a suitable land use zone applied to the land.

With regard to access to services, the areas in question already have access to a wide range of urban infrastructure including:

- › The M1 Motorway.
- › The Gold Coast / Brisbane railway line including the existing Ormeau railway station.
- › State schools and private schools.
- › Shopping Centres at Ormeau, Pimpama and Coomera.
- › The existing 'under capacity' northern wastewater treatment plant at Kerkin Road, North Pimpama.

In addition, further State infrastructure is in the process of being constructed nearby including:

- A new public hospital at George Alexander Way, Coomera; and
- The new Coomera Connector motorway, which will run through the Coomera / Pimpama locality.

Page 73 of the draft SEQRP states:

‘Expansion growth however, generally occurs with challenges in timing of infrastructure delivery with residents generally moving in before schools, public transport, community centres and health services are in place.

Building new infrastructure in greenfield areas can be up to four times more expensive than adapting existing infrastructure in established suburbs that have the capacity to support growth. Further, while houses on the outer fringe of urban areas can be more affordable, the journey to work costs increase the total cost of living to more than 30% of total household incomes in some areas, impacting on people’s ability to live affordably’.

We contend that the land we are referring to on the periphery of the existing Urban Footprint on the Gold Coast already has access to all of the urban facilities mentioned above and has journey to work costs which would be no greater than areas within the Urban Footprint to the north and south, and possibly lesser due to the presence of the Ormeau Railway Station.

Journey to work times will be substantially shorter under this scenario, than a 50+ minute drive to affordable housing at Beaudesert, Jimboomba or Yarrabilba.

2) Abandon the Southern Inter Urban Break

The Southern Inter Urban Break is a misnomer, because unlike the Northern Inter Urban Break it does not separate distinctly different urban areas. The Southern Inter Urban Break is approximately 3-5kms wide and is bisected by the 8-lane M1 motorway, and the Gold Coast-Brisbane railway line which includes the Ormeau railway station located at Mirambeena Drive, Ormeau. Adjoining the railway station to its west is a significant Rural Residential zoned area which is flood free and has many areas which do not have environmental constraints. It is stated on many occasions in the draft SEQRP that residential density should be clustered around public transport infrastructure, yet this location contains a railway station which is currently surrounded by 5,000m² Rural Residential allotments, because the land sits outside the SEQRP Urban Footprint and is prohibited to be further subdivided.

It is time to accept that this is not a true Inter Urban Break, and that the current dwelling supply crisis and need for affordable housing outranks this issue in terms of a priority for the Gold Coast community.

3) Accurately count and replace the residential and industrial land supply removed by Logan Council’s recent Q100 flood level increase

On Page 165 of the draft SEQRP, under the heading *‘Positive Practice: Logan City Council’s approach to flood modelling’*, the document states that:

‘Logan City Council is undertaking a Flood Studies Review Program to inform updated information on flooding and flood mapping. Council is preparing a new planning scheme, due for completion in 2025 which will incorporate updated flood information and a best practice approach to flood mapping’.

What is not mentioned in the document is that Logan Council, (without any advanced warning), increased the Q100 level of several of its catchments, by between 1.6m and 2m. This is a very significant increase in flood levels which has rendered a large amount of both residential and industrial land undevelopable. Council have not disclosed their intentions in relation to the remaining ‘unchanged’ catchments, and hence the development industry has assumed that Council intend to raise the Q100 flood level in those catchments to the same degree.

This incident raises a number of issues relevant to dwelling supply as follows:

- Can the immediate implementation of new Q100 flood levels which sterilize large amounts of urban land with no consultation or peer review analysis truly be described as ‘best practice’? In light of the importance of this issue and the dramatic impact it can have on macro scale development potential in SEQ, and the potential for different and contradictory flood policies to apply in different LGAs, we question if it is appropriate to leave important flood modelling exercises of this scale in the hands of Local Government, or whether such should be coordinated and administered by the State at an SEQ regional level. We contend that the State should adopt an over-riding role in relation to flood related issues in light of the significant impact these decisions can have on residential and industrial land supply in SEQ.
- What impact will the Q100 flood level increase have on Logan’s ability to accommodate the projected dwelling supply target under the draft SEQRP? Page 77 of the draft SEQRP identifies that Logan is to accommodate 234,100 dwellings to 2046 being an increase of 108,000 dwellings over a 25-year period. This represents an increase of 18,500 from the 2016-2041 dwelling increase projection in the current version of the SEQRP. It is inevitable that Logan Council’s increase of Q100 flood levels by 1.6m to 2m in several catchments will have a significant impact on residential dwellings supply to 2046. Valid questions to ask are:
 - a) What is the dwelling supply reduction that results?; and
 - b) Where are these lost dwellings going to be replaced/recovered?
- What impact will the Q100 flood level increase have on Logan’s ability to cater for the projected industrial land supply for this LGA? The increase of the Q100 flood level by 1.6m to 2m has sterilized large amounts of industrial land, causing it to be unable to be developed for industrial purposes. The draft SEQRP needs to take into account the quantity of industrial land which has been lost; anticipate where demand for industrial land will now move to and identify where future industrial workers will need to be housed to be in proximity to these industrial resources.

4) Acknowledge the new Queensland Harness Racing facility at Norwell and cater for resultant impacts to the sugar cane industry on the northern Gold Coast.

In December 2022 the Premier and Minister for Racing announced that the Queensland Government had purchased 72Ha of cane land at Norwell (near the intersection of Norwell Road and Fischers Road) to construct a new state of the art harness racing facility. This new facility will enable the existing Albion Park harness racing facility in Brisbane to be closed and redeveloped for infrastructure associated with the 2032 Olympics. This facility is not mentioned in the draft SEQRP, and the potential impact of the proposal on the sugar cane industry on the northern Gold Coast is also not mentioned. The Rocky Point Sugar Mill is located close to the proposed harness racing facility and currently relies on the large flood affected sugar cane catchment in the north-east area of the City, to sustain its milling operations and make them economically viable. A valid question to ask is whether or not the removal of 72Ha of cane land from the Rocky Point Sugar Mill catchment, will drop total production beneath a point beyond which the Mill is no longer viable? If the Mill is no longer viable, then the production of cane in the local area would not be economic, as it will require transportation to another mill. There are no other mills in the local area. This then calls into question what the replacement land uses will be for the affected land, and with respect to land which is flood free, and free of environmental constraints, whether such land is better utilised for urban residential development. This issue is not addressed in the draft SEQRP even though it is a document which looks forward to 2046. We urge the State to acknowledge this issue in the draft SEQRP document.

5) Acknowledge that significant future population growth will occur in the Scenic Rim LGA to 2046

As discussed earlier, it is highly likely that there will be a 'flight to affordability' in the Scenic Rim LGA to 2046 because this is where large areas of constraint free land for low density housing is situated. This LGA will inevitably be a source of affordable housing for low and middle income people employed on the Gold Coast, due to the lack of affordable housing supply in the City of Gold Coast. The draft SEQRP fails to acknowledge this by:

- Reducing the estimates for future dwelling supply in the Scenic Rim LGA from 10,000 in the 2016-2041 period under the current SEQRP; to 8,000 in the 2021-2046 period under the draft SEQRP.
- Exempting Scenic Rim LGA from needing to undertake a housing strategy.
- Exempting Scenic Rim LGA from minimum dwelling density targets.
- Failing to acknowledge that the Bromelton industrial area will require a large supply of affordable housing for low to middle income employees if it is to prosper.

We urge the Queensland Government to reconsider their position in relation to the Scenic Rim LGA and accept that the Scenic Rim LGA will be a major source of affordable housing over the next 23 years, and accept that east west transport corridors will need to be upgraded to accommodate this growth.

6) Abandon the notion of mandatory inclusionary planning

Mandatory inclusionary planning principles which prescribe the provision of social and affordable housing in private sector housing, have the strong potential to have negative unintended economic consequences. If the inclusion of such housing renders private sector housing projects economically unviable, then they will not proceed in which case less housing will be constructed, and the price of existing housing (both to purchase and rent) will increase further. If the

Queensland Government wishes to go down this path it should be on the proviso that it is voluntary and accompanied by additional planning incentives to restore economic viability to private sector housing projects.

We urge the Queensland Government to examine the NSW Government initiative applicable to State significant projects, where 30% development incentives have been applied to a 15% provision of affordable housing.

Other Points not Related to the Draft SEQRP

Although not part of this current SEQRP review, in order to substantially address the current dwelling supply crisis, we would also urge the Queensland Government to:

- Amend the Queensland Planning Regulation to set a default 350m² minimum lot size in the Low Density Residential Zone throughout the State of Queensland.
- Not only expand the SEQRP Urban Footprint for residential purposes, but also place the expanded land into a residential zone such as the Medium Density Residential Zone to enable development applications to be lodged immediately.
- Place all Emerging Communities zoned land intended for residential purposes, into the Medium Density Residential Zone throughout Queensland.
- Either implement State initiated TLPI's or direct Gold Coast Council to implement TLPIs to facilitate uplifted development potential in areas such as the Stage 3 Broadbeach to Burleigh Heads light rail corridor, and the Southport/ Labrador / Biggera Waters targeted growth area.
- Amend the Queensland Planning Regulation to implement State-wide reduced infrastructure caps on affordable private sector housing options such as Rooming Accommodation and Build to Rent product.

Thank you for the opportunity to comment on the draft SEQRP and we trust that you will take the above comments into consideration in relation to this important issue.

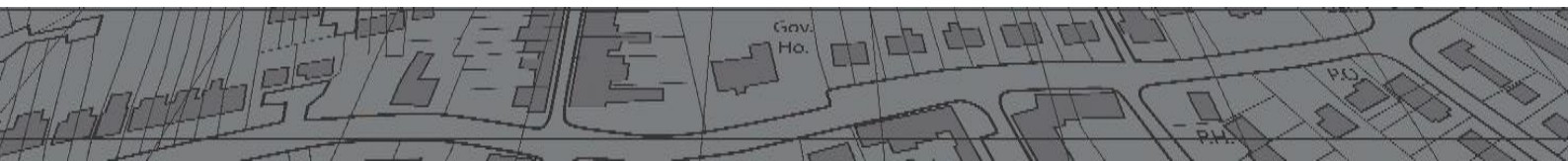
Yours sincerely,



David Ransom | Director
ZONE PLANNING QLD



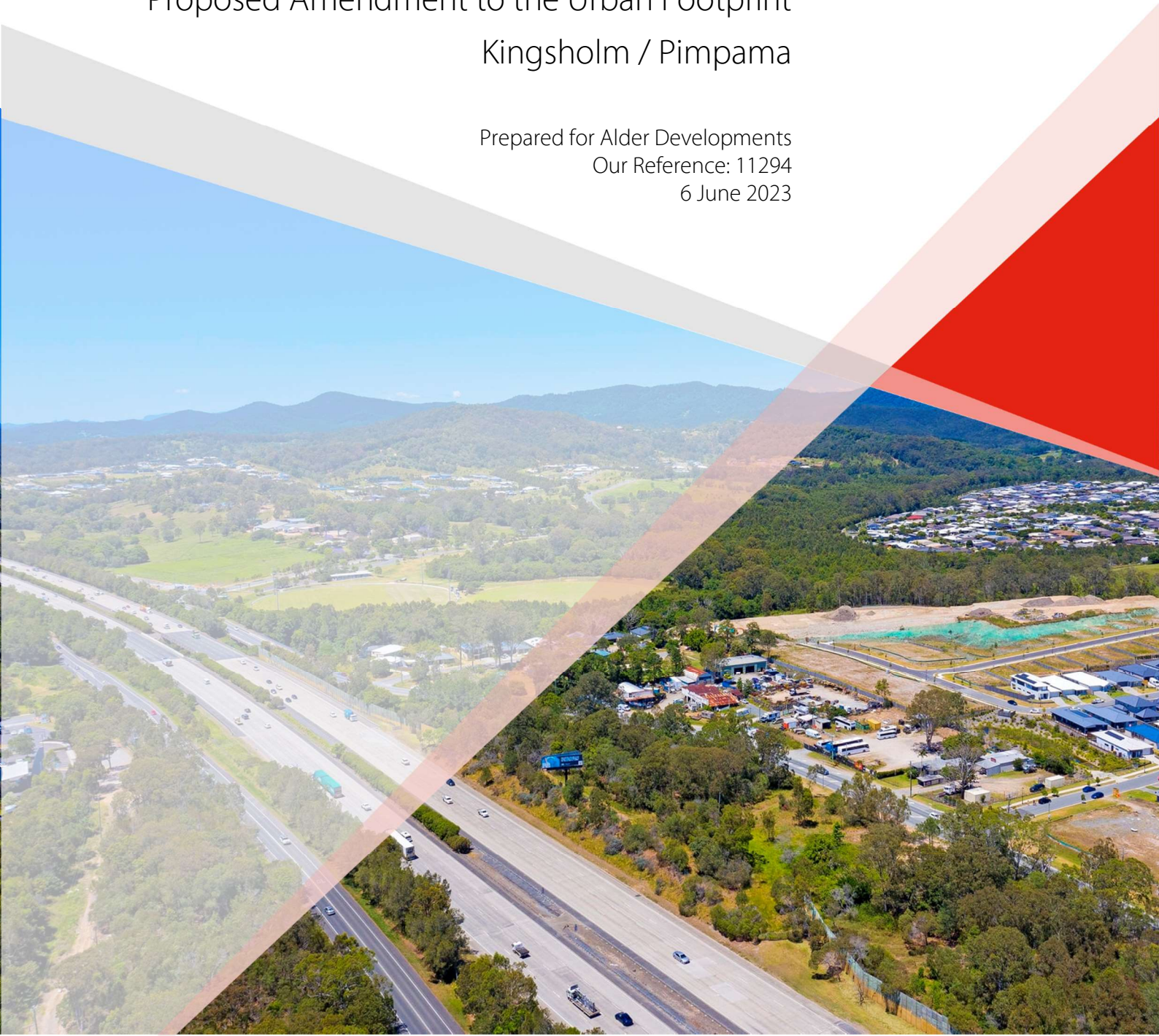
ATTACHMENT 1
Advocacy Report – Kingsholm Growth Corridor
Prepared by Saunders Havill Group



Advocacy Report – Kingsholm Growth Corridor

Proposed Amendment to the Urban Footprint
Kingsholm / Pimpama

Prepared for Alder Developments
Our Reference: 11294
6 June 2023



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Executive Summary

This report has been prepared by Saunders Havill Group (Saunders Havill) on behalf of Alder Developments Pty Ltd, the owner of land at Lots 1 & 3 Pacific Springs Drive, Pimpama (properly described as Lots 1 & 3 on SP238802). The subject land forms part of the Kingsholm Growth Corridor, an area of established and potential urban development land adjacent the Pacific Motorway within the suburbs of Kingsholm and Pimpama. The Kingsholm Growth Corridor is a **development ready** area that is well serviced by hard and soft infrastructure in a highly desirable location.

While the Kingsholm Growth Corridor is identified as an inter-urban break, an assessment of the existing land uses, infrastructure or functionality of the break has been undertaken. This report will demonstrate that there is an opportunity to maintain and enhance the environmental and aesthetic features of the break, while utilising existing infrastructure to provide a very significant growth corridor for the city.

In the wider context, Alder Developments Pty Ltd are a small land holder within the Kingsholm Growth Corridor, yet they see the potential to address the housing supply crisis within the northern Gold Coast by 'unlocking' a significant growth corridor.

Based on the assessment completed as part of this report, we believe the Kingsholm Growth Area provides a number of key strategic advantages, including:

- The area is not within the Regional biodiversity corridor nor identified as Regionally significant scenic amenity;
- Significant growth can be provided for without significantly impacting MSES or MNES;
- There are no flood constraints and transport crossings of waterways are already in place;
- Unlike the cane lands, the land is not subject to long term climate change issues;
- The corridor is ideally located to existing employment centres of Coomera and Yatala;
- The corridor is currently well serviced by hard and soft infrastructure including water, sewer, transport, community facilities and recreational spaces;
- The proposed residential expansion area is a logical extension of the existing urban area and is contiguous to it; and
- A dwelling capacity assessment has been undertaken, and there is potential to accommodate 15,000 dwellings within the identified development footprints.

The Kingsholm Growth Area is well suited to residential uses and offers a unique opportunity for the logical expansion of the Urban Footprint. Critically, the subject land has the potential to make a meaningful contribution to the northern Gold Coast's medium-term dwelling land supply and assist with mitigating current market price pressures and, as such, warrants further investigation on both a state and local level.

Furthermore, as per the Urban Footprint principles of Shaping SEQ, the development of the Kingsholm Growth Corridor:

- is physically suitable;
- is a logical expansion of an urban area AND of sufficient size to provide social and economic infrastructure efficiently;
- has ready access to services and employment;
- maximises the use of committed and planned urban infrastructure;
- is separated appropriately from incompatible land uses;
- is not an area with an unacceptable risk from natural hazards;
- does not contain significant areas of areas of national or state environmental significance and is not impacted by the regional biodiversity network;
- achieves an appropriate balance of urban development in the SEQ region by reducing the need for more growth areas in agricultural areas;
- maintains a well-planned region of urban areas, towns and villages by providing a consolidated supply within a major centre;
- minimises impacts on natural resources;
- avoid irrevocable impacts to important, sensitive natural environments in and outside the area; and
- provides the physical and social infrastructure efficiently, including public transport.

Critically, other than its location within the inter-urban break, the Kingsholm Growth Corridor meets all the principles that the State consider when mapping land within the Urban Footprint and presents a unique opportunity to provide much needed housing in a well serviced and efficient manner. As such, we believe the Kingsholm Growth Corridor should be included in the Urban Footprint as part of the current Regional Plan review process.

Saunders Havill look forward to engaging further with DSDILGP to facilitate the area's significant potential to provide a diverse mix of housing outcomes and leverage the opportunities presented by the existing infrastructure within the area.

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1. Subject Land and Locality

1.1. Lots 1 & 3 Pacific Springs Drive, Pimpama

The land in the ownership of Alder Development Pty Ltd is located adjacent the Pacific Motorway and accessed via Pacific Springs Drive. It is 51.53ha in size across 2 parcels. The parcels are separated by an unformed road reserve, that is identified as a missing link of the Pacific Motorway services road. The land is currently utilised for construction lay-down activities and was formally under the ownership of Department of Main Roads. Previously the site was a golf course and many of the fairways are still visible and unconstrained by Local and State constraints maps.



Figure 1 - Alder Development Pty Ltd Land Holdings

1.2. Kingsholm Growth Area

The Kingsholm Growth Area sits strategically within the northern Gold Coast region between the major employment areas of Coomera and Yatala. The following context plan demonstrates the area's location in comparison to other growth areas. In particular, the plan shows the travel distances and times between

growth areas and employment centres. Bahrs Scrub and Yarrabilba have been included for context and shows the advantages of developing the Kingsholm Growth Area in terms of travel distances and times.

The plan below also demonstrates that while Bahrs Scrub may be a suitable location for additional dwellings to service Yatala, it is disconnected from other centres such as Coomera. Similarly, Yarrabilba is not considered a suitable location for the provision of housing to support the Gold Coast job centres. Road infrastructure connecting Yarrabilba to existing centres is unsuitable for the volume of traffic that would occur, and upgrading these roads would be prohibitively expensive.

Only the development of the Kingsholm Growth Area can provide a population centre that directly and efficiently services the jobs within Coomera and Yatala.

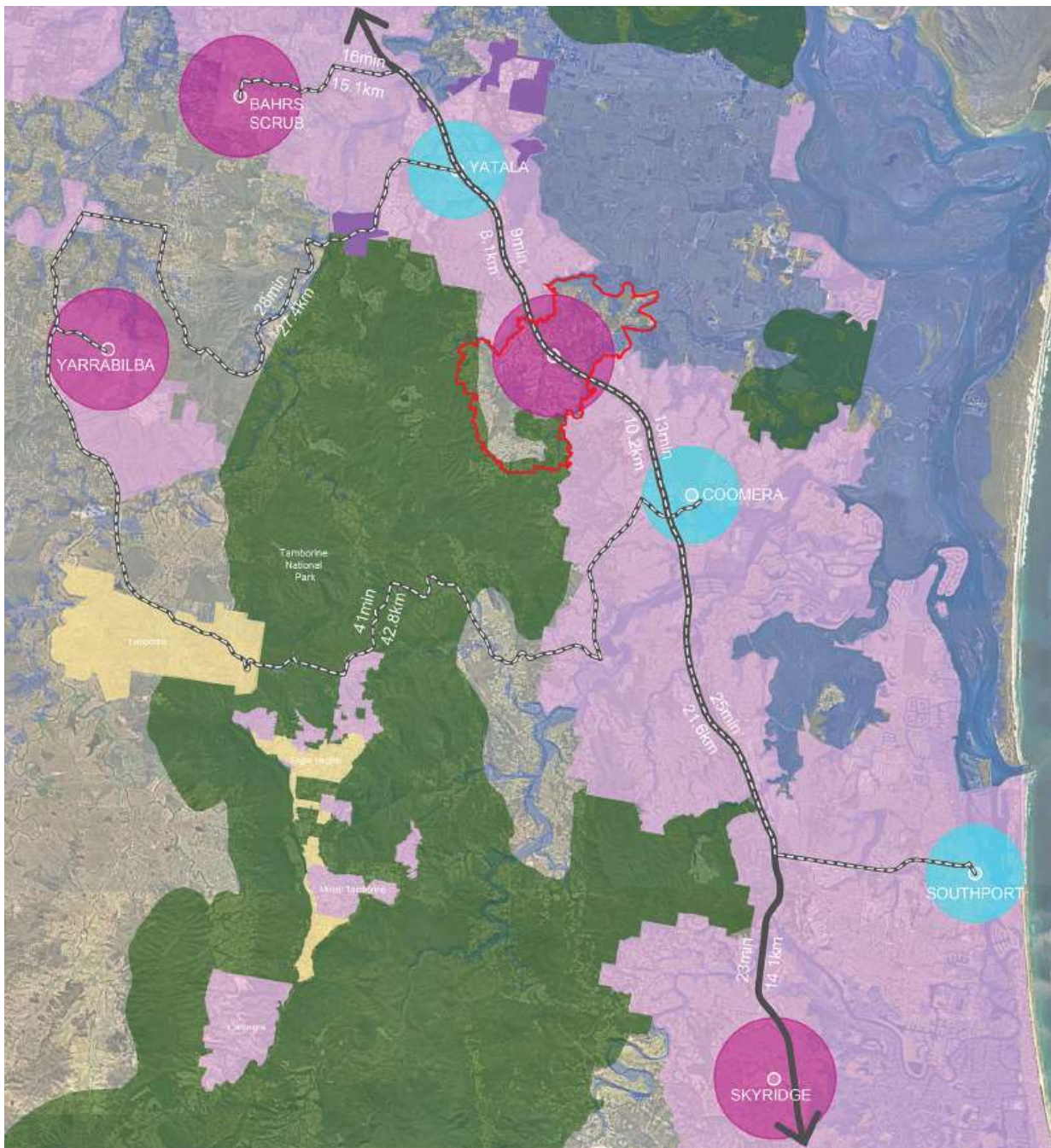


Figure 2 - Kingsholm Growth Area - Strategic Location

As detailed in the figure below, the Kingsholm Growth Area is benefitted by:

- Direct access to the Pacific Motorway,
- Existing Ormeau train station and frequent bus services,
- Existing primary and secondary schools including Ormeau State School, Pimpama State School and Lords Lutheran College. While Livingstone Christian College and Kings Christian College are immediately adjacent the area;
- Existing local, district and regional recreational parks; and
- Convenient access to the principal activity centres of Coomera and Beenleigh.

Community facilities and services located within and nearby the Kingsholm Growth Area are summarised below:

Supporting Community Facilities and Services

Schools, Child Care Facilities and Aged Care

- Ormeau State School
- Pimpama State School
- Lords Lutheran College
- Livingstone Christian College
- Kings Christian College
- Toogoolawa School
- Good Start Early Learning Pimpama
- Pimpama School of Arts
- Creative Minds Early Learning
- Edge Early Learning Pimpama
- Little Scholars School of Early Learning
- TriCare Pimpama Aged Care Residence

Recreation/ Community Facilities

- Pimpama River Parklands
- Ormeau Sports Park
- Ormeau Hill Park
- Community Garden
- Ormeau Pimpama Tennis Club
- Canowindra Park
- Rifle Range Road Park

Shops/ Amenities

- Pimpama City Shopping Centre
- Ormeau Village

Emergency Services

- Ormeau Rural Fire Station
- Pimpama Police Station
- Queensland Ambulance Service Pimpama

Public Transport

- Ormeau Train Station
- 728/729 Bus Service
- 721/722 Bus Service

As detailed in the figure below, for the purposes of this report, the Kingsholm Growth Area has been defined by the following:

- Existing Urban Footprint to the North;
- Local Government flood mapping to the East;
- Existing Urban Footprint to the South; and
- Regional biodiversity corridor to the West.

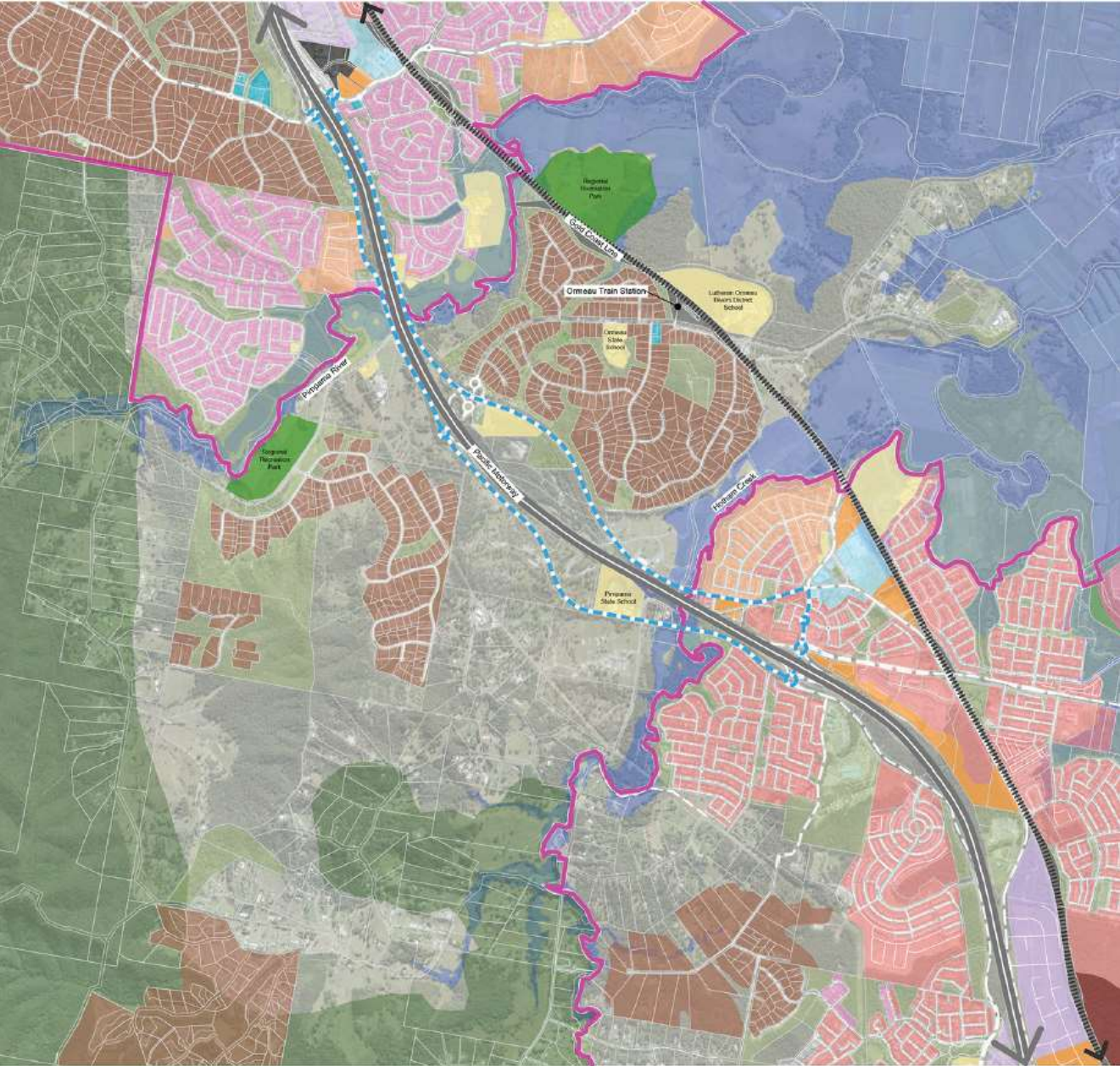


Figure 3 - Kingsholm Growth Area – Defined Area

2. Inter-Urban Break

The Strategic framework (map 2) - Settlement pattern in the City of Gold Coast City Plan (City Plan) identifies the Kingsholm Growth Area as Natural landscape and Rural residential areas within the Inter-urban break. Ormeau and Pimpama are nearby district centres to the immediate north and south while Coomera is identified as a principal centre.

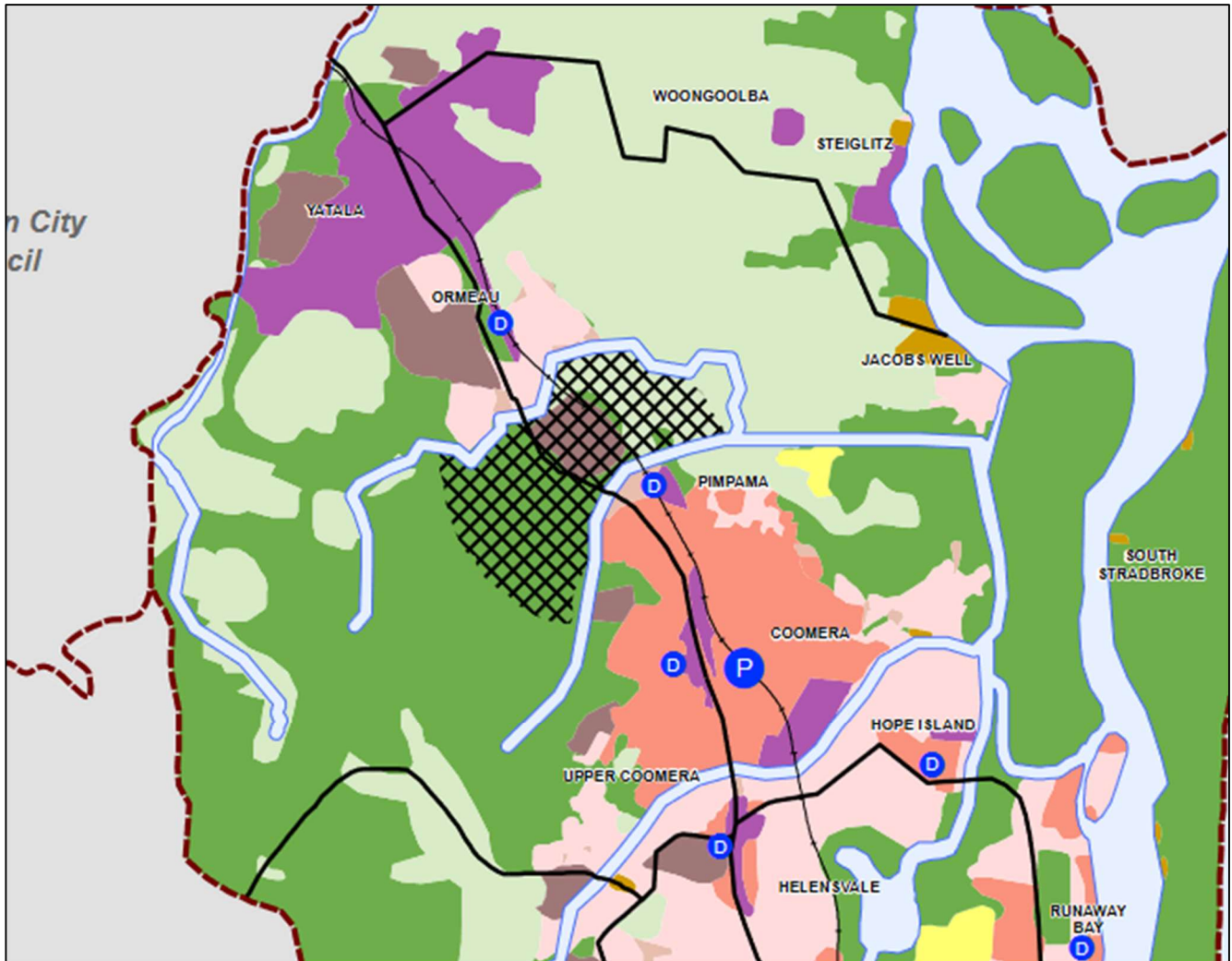


Figure 4 - City Plan Settlement Pattern

Currently under the Regional Plan, the subject land is identified within the Regional Landscape and Rural Production Area which restricts the availability of land for additional residential development due to the hierarchical order of planning instruments. It is noted that the intent of the Urban Footprint is not to cap or limit population growth but rather ensure maximisation of existing land and resources within the defined area. The footprint however is ultimately designed to be flexible to allow for future inclusion of more land, changes in environmental policy and increased population growth.

The inter-urban break is 1 of 2 inter-urban breaks remaining in the Regional Plan. The other is located between the Metro and Northern sub-regions. The northern inter-urban break is approximately 20km wide

and contains a Regional biodiversity corridor. Under the 2009 Regional Plan 5 Inter-urban breaks existed, yet 3 of those were removed under the current 2017 Regional Plan and no more included.

While the Kingsholm Growth Corridor is identified as an inter-urban break, an assessment of the existing land uses, infrastructure or functionality of the break has been undertaken. A review of the purpose of the inter-urban break against the intents of the Regional Plan has been undertaken as part of this report and we do not believe the inter-urban break is functioning at originally intended.

While the community may be aware of the presence of an inter-urban break, we do not believe many could identify its location. For those who could, the inter-urban break would likely have the sole purpose of providing a green break from the M1 between Ormeau and Pimpama. We believe there is an opportunity to maintain and enhance the environmental and aesthetic features of the break, while providing a very significant growth corridor for the city.

Under the Regional Plan, the inter-urban break is defined as:

"A non-urban land area separating major urban development areas."

Additionally, Chapter 3 of the document refers to the inter-urban break as:

"Non-urban areas that differentiate major urban development areas."

Benefits: Enhanced community and sub-regional identity and sense of place, definition of landscape corridors, agriculture and forestry; potential provision of land for public recreation and other ecosystem services close to population centres."

Chapter 3 also specifically references the southern Inter-urban break as:

"The Brisbane–Logan–Gold Coast inter-urban break, centred on the Pimpama River–Hotham Creek, will be retained as a regionally significant green break providing open space, environmental values, amenity and other non-urban landscape values between major urban areas."

This inter-urban break protects part of a strategic corridor and supports rural production and outdoor recreation opportunities."

It is considered the Kingsholm Growth Area does not meet these definitions as follows:

- The area could be considered 'urban' as a significant portion has been developed and cleared for rural-residential properties, contains significant transport infrastructure and 3 x schools. The purpose of the Inter-urban break has been eroded prior to the Regional Plan being implemented;
- There are no rural land uses within the area with the exception of a small horse stable and training facility opposite the Pimpama State School;
- The feeling of 'separation' between 2 urban areas is lost given the speed at which traffic passes through the break on the motorway. The break is also indiscernible from the trainline given Ormeau station is located within it;
- The 'break' does not separate 2 cities, but is located between 2 Gold Coast suburbs;

- The 'break' does not contain a Regional biodiversity corridor, however can retain and enhance environmental values along Pimpama River; and
- The sense of amenity can be retained and enhanced along the motorway and trainline through a 'green wall' to buffer any future urban development.

Given that the Kingsholm Growth Area does not function as initially intended, we believe a review of the inter-urban break should be done to determine its ultimate purpose. We believe there is an opportunity to maintain and enhance the environmental and aesthetic features of the break, while providing a very significant growth corridor for the city.

3. Need

The Regional Plan established that the Gold Coast’s expected population growth will require an additional 158,900 dwellings to be provided within the Gold Coast LGA between 2016 and 2041, of which 127,900 dwellings (80%) are to be supplied within the consolidation area and the balance 31,000 dwellings (20%) are to be supplied within the expansion area. As has recently been acknowledged by the Department, population growth has accelerated and is expected to exceed the figures presented by the current Regional Plan. The under-utilised urban footprint has also been identified as containing 60% of land that cannot be developed. It is expected that this allocation of dwelling supply will need to be redistributed within consolidation areas and new expansion areas.

The Gold Coast is also one of the fastest growing and most constrained cities in the State. In 2019, before the recent population growth and supply crisis, Queensland Treasury stated that the Gold Coast had only 11 – 18 years of dwelling supply left (see figure below). Since then, much of the available land has been developed, with the Gold Coast LGA now having the smallest under-utilised urban footprint within SEQ, no identified Potential Future Growth Areas, and only 1 major greenfield development site.

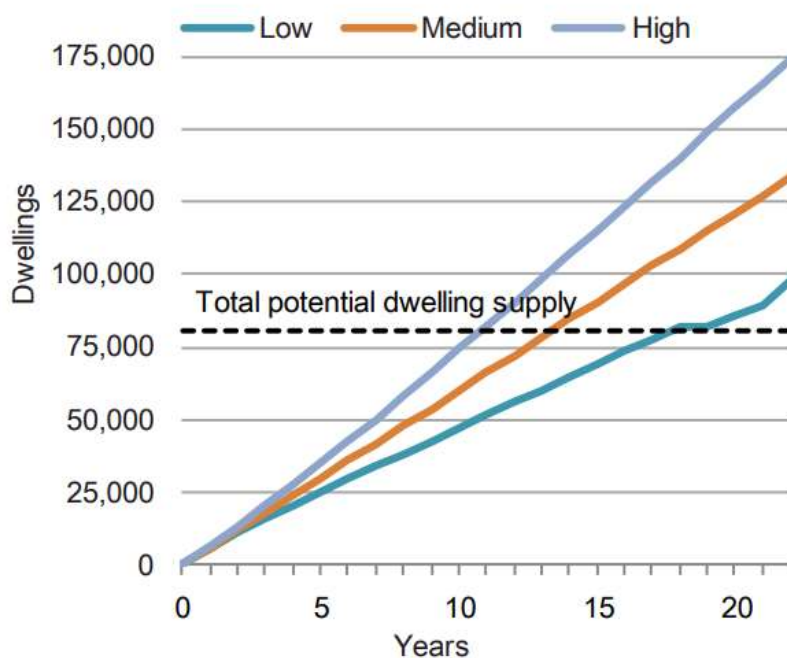


Figure 5 - Queensland Government Statistician’s Office, Broadhectare profile – Gold Coast City, September 2019

The current capacity of the LGA means that the major future growth areas will either occur within New South Wales or in locations such as Canungra, Beaudesert or Yarrabilba. The further development of these areas is inconsistent with the intents of the Regional Plan and will come at significant whole of life costs to future residents due to the separation between residential and job centres.

Significant further evidence can be provided on the need for additional greenfield dwelling capacity in the Gold Coast LGA can be provided, but we believe the need is well understood and further evidence is not necessary.

4. Kingsholm Growth Area

In order to determine the development potential of the Kingsholm Growth Area a detailed assessment of Federal, State and Local Government matters has been undertaken. It was critical to us that the expansion of the Urban Footprint be based on the ability to deliver much needed housing on the Gold Coast, and not seek Urban Footprint expansion for areas subject to constraints. The layering of the assessments and defined extents have been highlighted in the figures below.

As detailed previously, the Kingsholm Growth Area is well defined by the extent of the Urban Footprint, flood mapping and the Regional Biodiversity corridor. Further analysis of the Regional Biodiversity corridor in the southern and western extent of the area showed that many rural properties that are predominantly clear of vegetation were included within the Regional Biodiversity corridor. This is not surprising because of the scale of the mapping and general nature of the Regional Biodiversity corridors within the Regional Plan. As minimal environmental values were anticipated on cleared land, some of the Regional Biodiversity corridor has been included in the Kingsholm Growth Area.

The extent of the Kingsholm Growth Area and the area we believe should be included in the Urban Footprint is detailed below. In addition to the Regional Biodiversity corridors, we note that some sites contain mapped flooding. This land has been included to ensure the proposed Urban Footprint aligns with existing property boundaries.

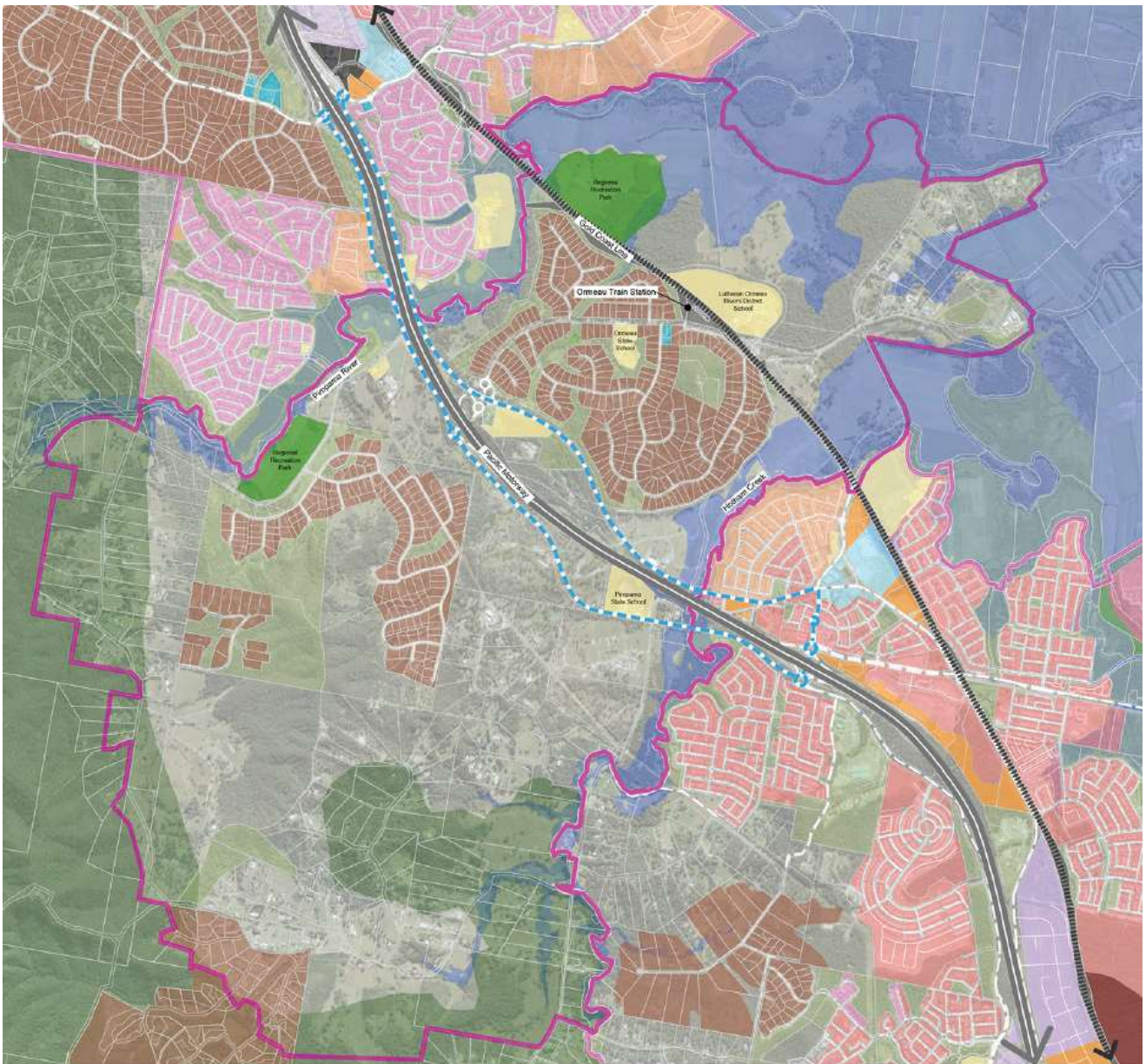


Figure 6 - Kingsholm Growth Area – Proposed Urban Footprint

As the State is aware, the designation of land within the Urban Footprint is not a determine that all the land is suitable for urban uses. To determine the potential development area within the growth corridor, a further assessment of State layers, and most importantly Koala Habitat, was used. The outcomes of this can be seen in the figure below.

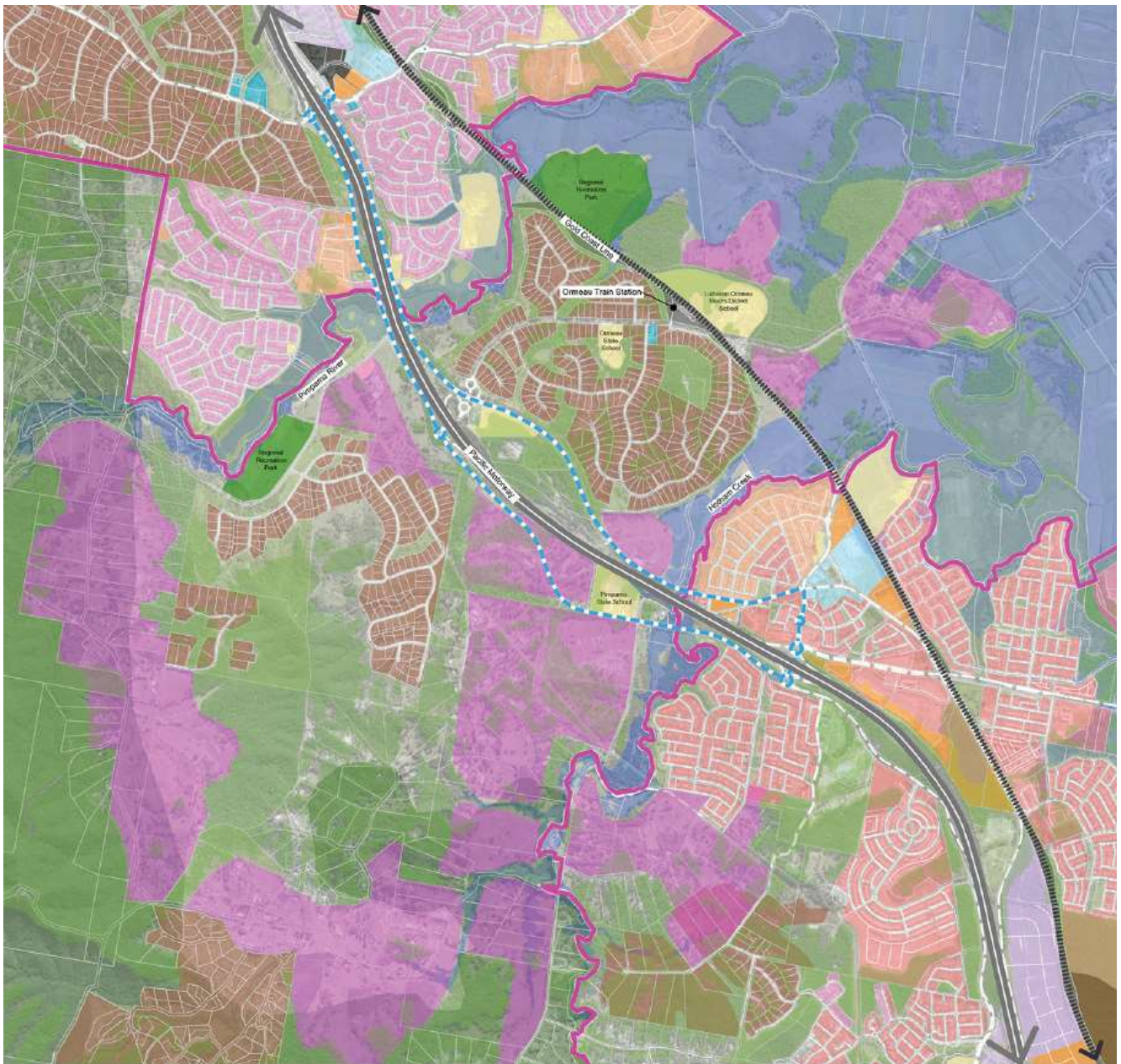


Figure 7 - Kingsholm Growth Area – Potential Developable Area

In terms of the outcomes of the above we note:

- Development provides for the protection of the Pimpama River and Hotham Creek corridors;
- A significant ridgeline exists in the central west portion of the growth area. This contains significant vegetation and has been retained for environmental and aesthetic purposes; and
- Environmental corridors and linkages connect water corridors and areas of significant vegetation to ensure the connectivity of environmental areas are strong.

As demonstrated in the figure below, the provision of a logical road network can be provided on the back of existing road reserves. The existence of the existing road network will ensure the ultimate road network is efficient, well connected and provides for opportunities to avoid natural disasters.

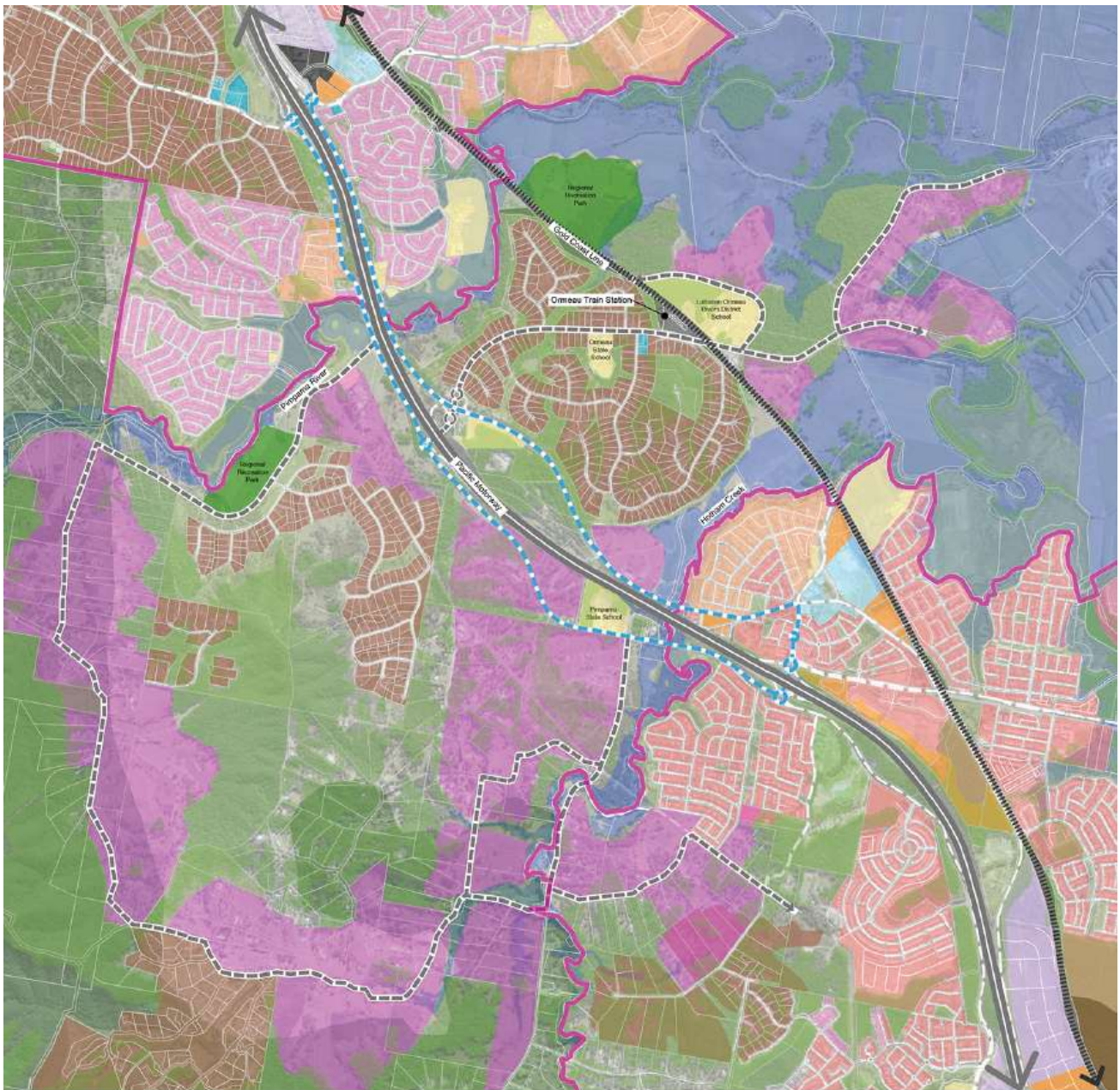


Figure 8 - Kingsholm Growth Area – Potential Road Network

The urban development area shown in the figure above is 845 hectares. To ensure the land is utilised for its highest and best use, we would anticipate a density outcome of approximately 18 dwellings per hectare. This represents in the order of 15,000 new dwellings and would be the largest urban growth area within the Gold Coast LGA.

More than just an opportunity for the provision of much needed dwellings, the Kingsholm Growth Area provides dwellings in a location that provides immediate access to two of the largest jobs centres in the LGA, public transport, schools and high levels of residential amenity. The land is also not subject to flooding and climate change constraints which we believe are an insurmountable challenge for other more heavily publicised growth areas for the city.

Given the pressures of population growth and constrained urban growth opportunities, we do not believe the potential of the Kingsholm Growth Area can be overlooked.

5. The Immediate Opportunity

As detailed in the figure below, the land in the ownership of Alder Development Pty Ltd is located centrally within the Kingsholm Growth Area . The 51.53ha site provides an immediate opportunity to see the vision of the Kingsholm Growth Area realised.

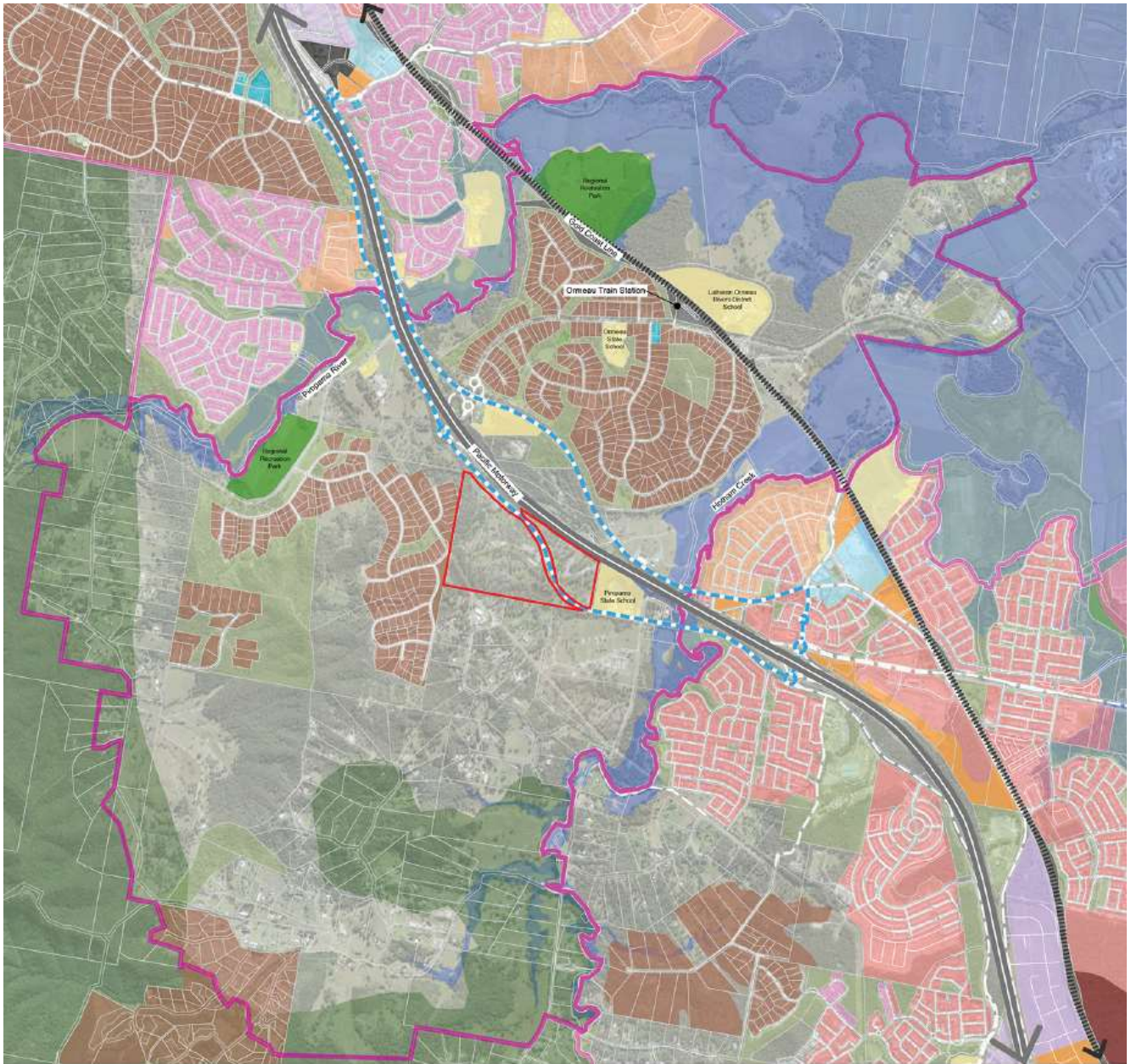


Figure 9 - Kingsholm Growth Area – Alder Developments Land Holding

To demonstrate the type of development that could be achieved on the land, the following concept sketch has been prepared.

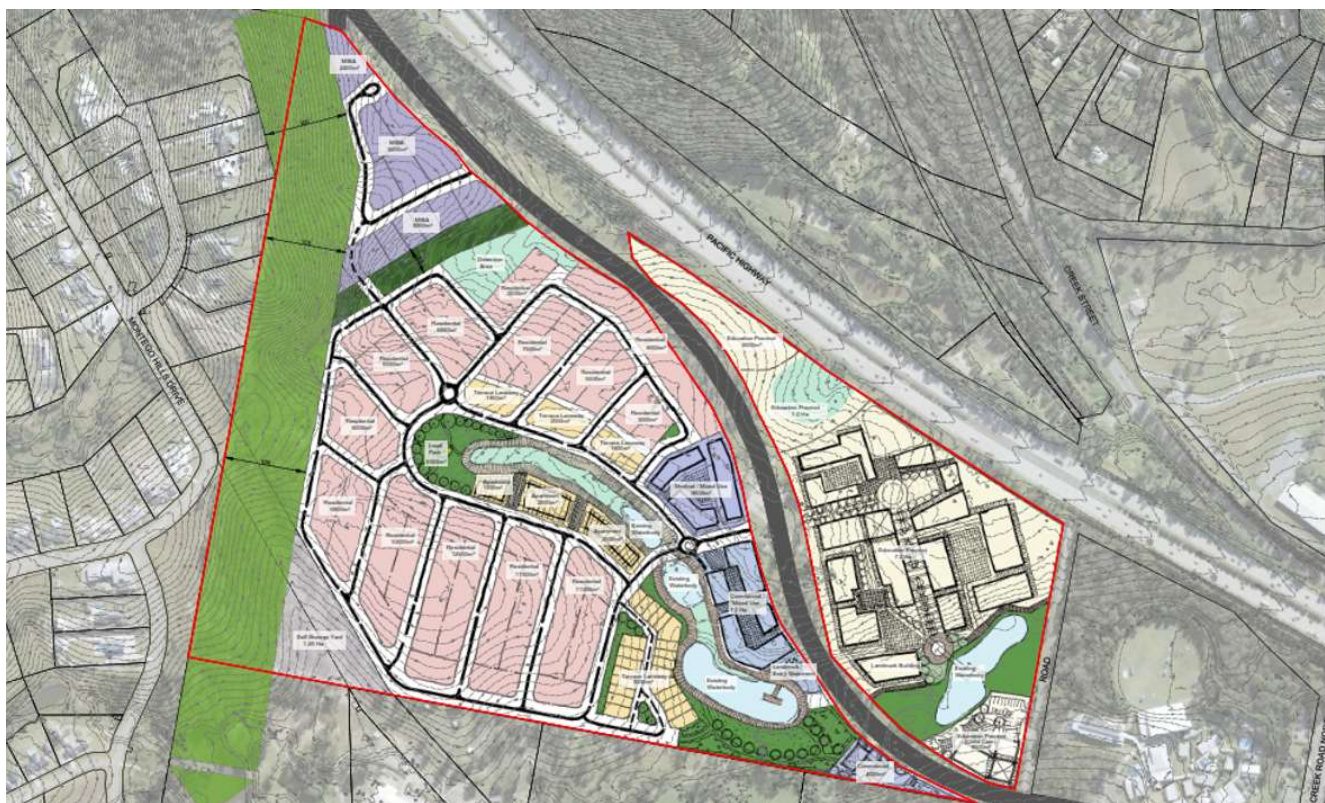


Figure 10 – Development Potential of Alder Developments Land Holding

The land uses proposed within the site are as follows:

LAND BUDGET	Area (Ha)	%
Area of Subject Site / Stage	51.530 ha	—
Apartment / Terrace Laneway	2.060 ha	4.00%
Residential	9.830 ha	19.08%
Education Precinct	9.950 ha	19.31%
Commercial / Mixed Use	1.200 ha	2.33%
Medical / Mixed Use	0.960 ha	1.86%
Environmental Corridor	7.150 ha	13.88%
Open Space / Local Park Precinct	7.970 ha	15.47%
MIBA	1.960 ha	3.80%
Road Areas	9.190 ha	17.83%
Self Storage Yard	1.260 ha	2.45%
Total	51.530 ha	100.0%

In addition to the provision of a diverse range of dwelling types and supporting land uses, the development of the site could also facilitate the construction of the missing link service road along the M1 and the rehabilitation of a north / south environmental corridor to connect Pimpama River. Furthermore, to ensure the development of the land is not held up because of matters of National Environmental Significance, an EPBC application is currently being prepared and will be lodged shortly.

While the development of the subject land is significant in its own right, providing hundreds of new dwellings, the other non-residential uses proposed on the site will ensure the development acts as a catalyst for the development of the locality and provide the necessary services to support such a significant growth area.

6. Conclusion

The opportunity provided by the Kingsholm Growth Area cannot be overlooked. Specifically:

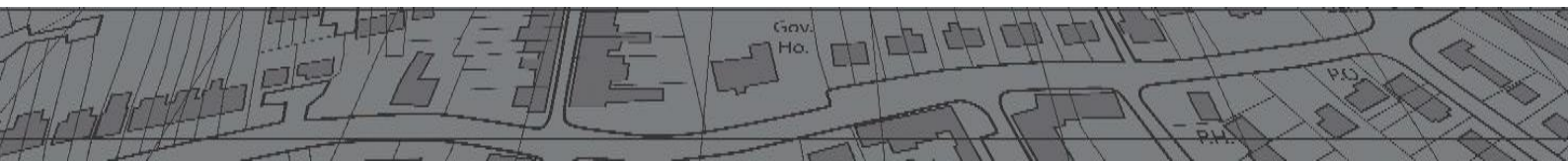
- An assessment of the finality of the inter-urban break has not been undertaken to date to determine if it meets its intended purpose;
- The area is currently well serviced by hard and soft infrastructure including water, sewer, transport, community facilities and recreational spaces;
- An assessment of constraints has determined that significant growth can be provided for without significantly impacting MSES or MNES;
- The Kingsholm Growth Corridor is not subject to climate change hazards such as sea level rise;
- The area has the potential to provide a in the order of 15,000 new dwellings and will make an important contribution to Council's medium-term dwelling land supply;
- There is an opportunity to maintain and enhance the environmental and aesthetic features of the break as part of the development of the Kingsholm Growth Corridor;
- The proposed residential expansion area is a logical extension of the existing urban area and is contiguous to it;
- The growth area has immediate proximity to two of the cities most significant job centres; and
- Other than its identification as an inter-urban break, the land achieves all urban footprint principals stated in the Regional Plan.

Given the importance of the opportunity of the Kingsholm Growth Area, we recommend the State include the land within the Urban Footprint.



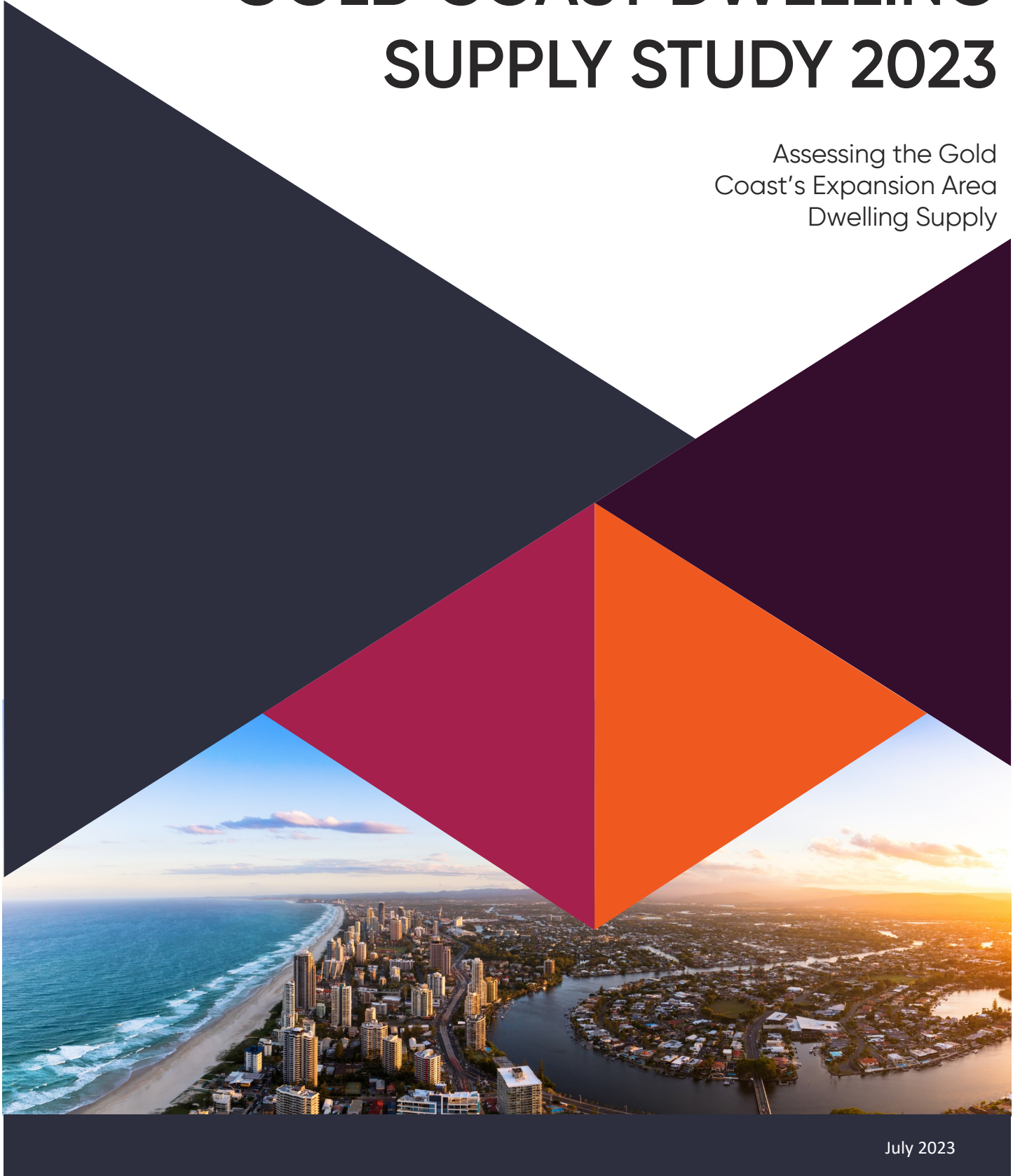
ATTACHMENT 2

Greenfield Dwelling Supply Report



GOLD COAST DWELLING SUPPLY STUDY 2023

Assessing the Gold
Coast's Expansion Area
Dwelling Supply



This report was prepared by Zone Planning Group in collaboration with BIOME Consulting, Matusik Property Insights and Zone Landscape Architecture.

July 2023

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EXECUTIVE SUMMARY

South East Queensland is currently home to approximately 3.9 million people and is one of the fastest growing urban regions in Australia. Recent events such as the Covid-19 pandemic and announcement of Brisbane hosting the 2032 Olympics have prompted increased investment in SEQ and in particular, the Gold Coast region. In order to accommodate the current and forecast growth it is critical that State and local planning instruments are structured in such a manner that supports residential development in the right locations and facilitates housing choice and diversity.

In December 2018 the Queensland Government released the first Land Supply and Development Monitoring Report, an initiative identified by ShapingSEQ, the South East Queensland Regional Plan 2017, as a tool for monitoring the delivery and planned supply of dwelling stock within the region. An updated LSDM report has been released every year since, with the last issue being the 2021 report published in December 2022.

The Gold Coast Dwelling Supply Study was originally published in March 2020, having been jointly prepared by Zone Planning Group, Matusik Property Insights, Biome Consulting and Zone Landscape Architecture. The purpose of this report, like the 2020 Report, is to assess the realistic availability of land within the Gold Coast local government area's expansion area to accommodate residential development through to 2041. In particular, this report analyses the existing development potential of land based on the local and State planning controls applicable to the Gold Coast expansion land as at April 2023.

Following the methodology adopted in the 2020 Report, the analysis presented in this report has been completed via a comprehensive sieve mapping exercise undertaken by Zone Planning Group, Biome Consulting and Zone Landscape Architecture to identify the study area, applicable planning controls, calculate planned residential densities and apply environmental constraints which may inhibit future development. This analysis focused only on the Code Assessable development outcomes achievable under the relevant provisions of the Gold Coast City Plan (v9) and the planned residential densities allowed for under both the City Plan and Planning Assumptions associated with the Gold Coast Local Government Infrastructure Plan (LGIP) (version 1).

It is relevant to note that, on the whole, this report has found that the available land for residential development within the Gold Coast's expansion area has decreased by approximately 508ha from 2462ha to 1953ha since the 2020 Report was published. This is largely owing to land being consumed for other non-residential purposes (eg. schools, hospitals, roads, parks, commercial development).

Following the identification of the total developable area within the Gold Coast's expansion area, Matusik Property Insights undertook a final sieve to determine the economic reality and likelihood of the planned dwelling yield being delivered by 2041.

This assessment has determined that, cumulatively, the Gold Coast expansion area has the capacity to accommodate up to 17,654 dwellings to 2041, less than that identified by the 2021 LSDM. Of these possible dwellings, only 10,542 have been assessed as having a high chance of being developed by 2041.

Out of the dwellings with a high chance of being developed by 2041, they comprise:

- 4,808 dwellings under 25 dwellings per hectare
- 5,734 dwellings over 25 dwellings per hectare.

Based on the high chance figures mentioned above and the annual average dwelling demand for new housing stock over the past 10 years, the Gold Coast expansion area provides approximately 6.3 years of supply.

Significantly, with the increased demand for detached housing stock (ie. densities of 25 dwellings per hectare or less), it is anticipated that there is less than 4 years of supply of land accommodating densities up to 25 dwellings per hectare remaining within the Gold Coast expansion area.

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BACKGROUND

In February 2020, Zone Planning Group in conjunction with Biome Consulting, Matusik Property Insights and Zone Landscape Architecture completed the first iteration of the Gold Coast Dwelling Supply Study (2020 Report).

This current study seeks to build upon the work undertaken in the 2020 Report and examine dwelling supply within the expansion area of the City of Gold Coast local government area (LGA) to the year 2041. April 2023 is used as the baseline for this study.

Currently home to approximately 3.9 million people, South East Queensland has experienced significant growth over the last 20 years and is anticipated to continue to experience similar growth over the coming years. As the region's population continues to grow, so does the demand for housing. It is therefore critical that State and local planning instruments are structured in such a manner that facilitates development in the right locations to accommodate this growth and provide for housing choice and diversity.

ShapingSEQ – South East Queensland Regional Plan 2017

ShapingSEQ, the South East Queensland Regional Plan 2017 (SEQRP), was published by the Queensland Government in August 2017, establishing a 50 year vision for South East Queensland (SEQ). To facilitate the development of the region, the SEQRP establishes three key land use designations, the Urban Footprint, Rural Living Precinct (RLP) and Regional Landscape and Rural Production Area (RLRPA). Generally speaking, land within the Urban Footprint is intended to accommodate the region's urban development through until the year 2041 with the RLP and RLRPA intended to preserve areas of natural and environmental significance and for agricultural production (Department of Infrastructure, Local Government and Planning, 2017).

The SEQRP also continues to define the region's Existing Urban Area (EUA), a boundary formed based on SA2 boundaries as provided by the Australian Bureau of Statistics. The EUA has been in place since the 2005 iteration of the SEQRP; however, the boundaries which define it have shifted over time transitioning from former census collection districts to the current SA2-based boundary. The EUA is critical to defining where the region's expansion and consolidation development occurs.

Expansion development is defined by the SEQRP as:

'Development on land outside the existing urban area boundary. Previously known as 'greenfield development'' (Department of Infrastructure, Local Government and Planning, 2017).

Consolidation development is defined by the SEQRP as:

'Development on land inside the existing urban area boundary. Previously known as 'infill development'' (Department of Infrastructure, Local Government and Planning, 2017).

Being SA2-based, there are discrepancies between the EUA and cadastre-based Urban Footprint boundaries resulting in land located outside of the Urban Footprint being located within the EUA. This has the potential to skew consolidation and expansion area targets with the development potential of land outside of the Urban Footprint being significantly constrained by the assessment benchmarks provided by Schedule 10 of the Planning Regulation 2017 with respect to land in the RLP and RLRPA. At a regional level, the EUA is primarily focused around the main urban townships and cities (see **Figure 1**).

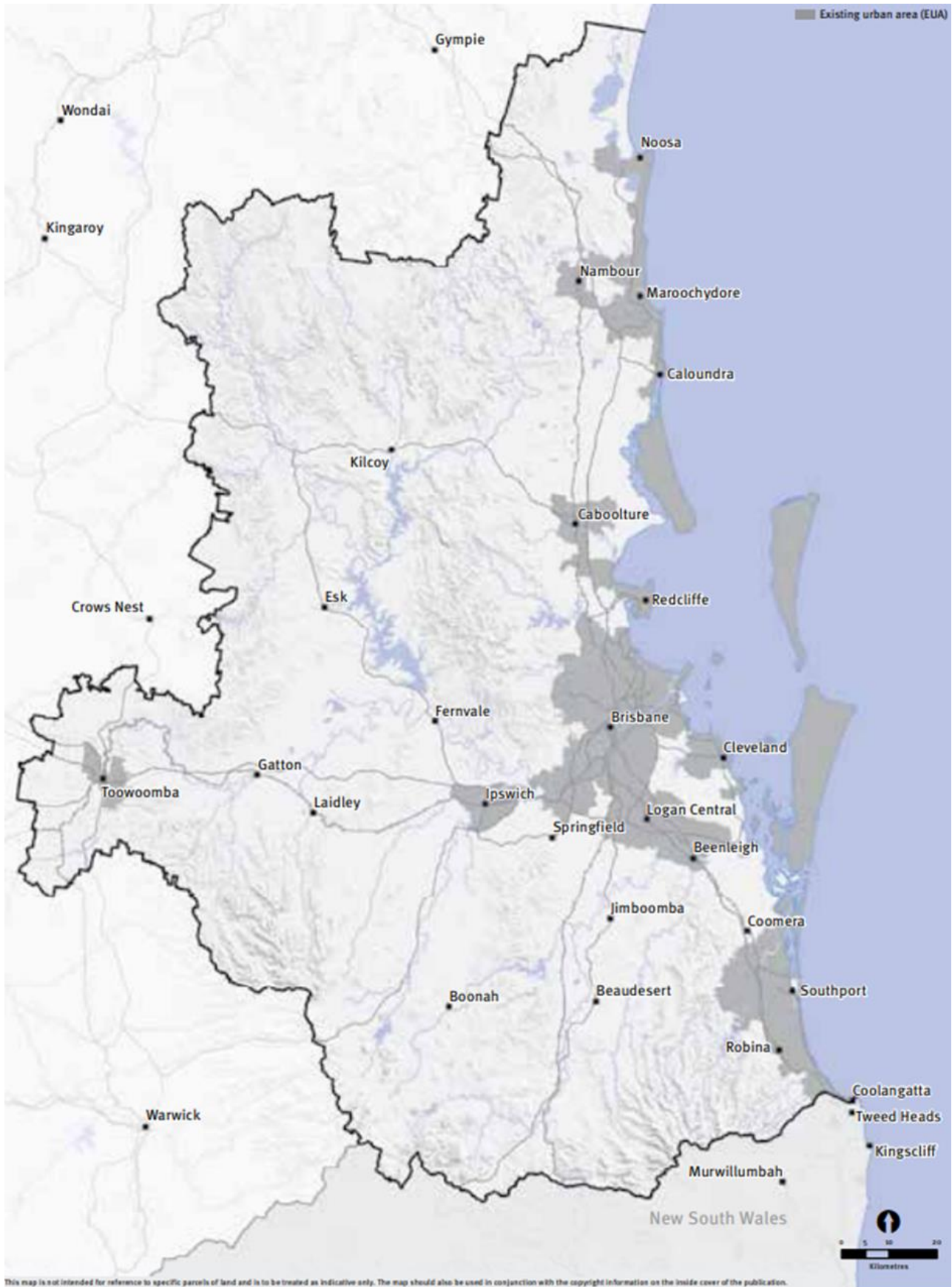


Figure 1: Existing Urban Area boundary (Department of Infrastructure, Local Government and Planning, 2017)

The SEQRP includes sub-regional directions (a revised version of the former sub-regional narrative) for each sub-region of SEQ which are intended to guide development in these areas over the 25 year period until 2041. The Gold Coast LGA is located within the Southern Sub-Region, being the only LGA in that sub-region.

At the time of drafting the SEQRP, the Gold Coast LGA had a population of approximately 567,900 people with the population estimated to increase by 351,100 people between 2016 and 2041. To accommodate this population growth, the SEQRP anticipates an additional 158,900 dwellings will be required to accommodate these people of which 20% (31,000 dwellings) are to be located within the LGA's expansion area and the balance 80% within the consolidation area (Department of Infrastructure, Local Government and Planning, 2017). Interestingly, there were no significant changes to the Urban Footprint boundary within the Southern Sub-Region as part of the 2016 SEQRP review leading to the publication of ShapingSEQ.

To facilitate the implementation of the direction set by ShapingSEQ, the SEQRP establishes a number of benchmarks for local governments to meet through their planning schemes, including:

- minimum 15 years of dwelling supply in the consolidation and expansion areas;
- sufficient land to achieve the dwelling targets set for each sub-region;
- allowing development to facilitate an 80% / 20% split in terms of consolidation versus expansion development; and
- maintaining a minimum 4 years of supply of reconfiguring a lot approvals (Department of Infrastructure, Local Government and Planning, 2017).

At the time of preparing this report, the State Government was in the process of undertaking a review of ShapingSEQ with a view to implementing a new version of the SEQRP in late 2023/early 2024.

Land Supply and Development Monitoring Report

In addition to setting the direction for the future development of SEQ, ShapingSEQ identifies a number of measures for delivering and monitoring the goals for the region, including land supply and development monitoring. In December 2018 the Queensland Government released the first Land Supply and Development Monitoring Report. This has now evolved into an annual report with the most recent 2021 iteration published in December 2022.

LSDM Report Findings

For the purpose of this study, the most relevant section of the LSDM report is that relating to planned dwelling supply, as such ultimately demonstrates that ability for the Gold Coast LGA to support continued growth into the future. The LSDM report defined planned dwelling supply on the basis of capacity and realistic availability and concluded that the Gold Coast has in excess of the required minimum 15 years of supply in both the consolidation and expansion areas. The initial 2018 iteration of the LSDM identified a capacity of 46,911 dwellings and realistic availability of 45,376 dwellings within the Gold Coast's expansion area (The State of Queensland, Department of State Development, Manufacturing, Infrastructure and Planning, 2018). While this remained largely unchanged through the subsequent 2019 and 2020 publications of the report, the 2021 iteration identified a capacity of 35,123 dwellings and realistic availability of 23,859 dwellings within the Gold Coast expansion area (Department of State Development Infrastructure, Local Government & Planning, 2022).

The change in realistic availability and capacity figures in the 2021 LSDM is a result of the estimate of constructed dwellings since 2016 having been subtracted from the figures contained in the earlier versions of the LSDM.

Capacity is defined by the LSDM report as *'the number of dwellings that could be developed in an area when fully developed in compliance with the planning instruments that currently apply in that area, given the expected nature of dwelling demand and densities over time'* (The State of Queensland, Department of State Development, Manufacturing, Infrastructure and Planning, 2018).

While 'realistic availability' is defined as *'a scenario which assumes some of the capacity of planned dwelling supply is not available for development by 2041 due to factors that may constrain the availability of land for development to accommodate dwellings. Such factors may include:*

- *infrastructure availability*
- *the practical staging of development*
- *landownership fragmentation*
- *landowner intent*
- *insufficient demand for the planned scale/density of uses in some areas up to 2041*
- *existing versus planned density (or land value in the existing versus the planned use)*
- *the age of existing development*
- *accessibility*
- *constraints affecting the economic feasibility of development* (Department of State Development Infrastructure, Local Government & Planning, 2022)'.

The 2021 LSDM indicates that both the capacity and realistic supply of the Gold Coast expansion area from 2021 onwards exceeds the 2041 dwelling supply benchmark established by ShapingSEQ for the Gold Coast expansion area.

In terms of years of supply, the 2021 LSDM suggests that both the realistic availability (16 years) and capacity (24 years) of the expansion area exceeds the minimum 15 years of supply stated under ShapingSEQ.

LSDM Report Methodology

In support of the LSDM report, the State published background material under the title of 'Best Practice Research' and 'Technical Notes'; however it is important to note that the methodologies and data of the various technical reports relating to the whole SEQ region purportedly commissioned by the State have not been publicly published. Specifically, these reports include the following research:

- realistic land availability and take-up, undertaken by Spatial Economics;
- use and density, undertaken by Spatial Economics;
- land suitability, undertaken by RPS; and
- ability to service, undertaken by GHD.

Through the Best Practice Research section of the LSDM report, it is noted that realistic land availability and take-up was assessed both based on the longer-term capacity of zoned land to accommodate growth but also factors which may influence how land is used, including:

- infrastructure availability;
- instances where planned uses are not in sufficient demand up to the planning horizon;
- existing versus planned density (or land value in the existing versus planned uses);
- age of the existing development on land;
- accessibility; and
- any constraints which may affect the economic feasibility of development.

SCOPE

Purpose of the report

The purpose of this report is to determine the realistic availability of land within the Gold Coast's expansion area to accommodate residential development through to 2041. In particular, this report analyses the existing development potential of land based on the local and State planning controls applicable to the expansion land on the Gold Coast as at April 2023.

The methodology associated with this analysis follows that set out in the 2020 Report and is summarised in the following section of this report.

METHODOLOGY

This section of the report provides a breakdown of the methodology utilised to analyse the realistic planned dwelling supply within the Gold Coast LGA's expansion area.

From the outset it is important to recognise that this analysis is only based on the expansion area within the Gold Coast LGA. Specifically, this is defined based on the land within the Gold Coast LGA that is outside of the EUA boundary but contained within the Urban Footprint boundary (see **Figure 2**).

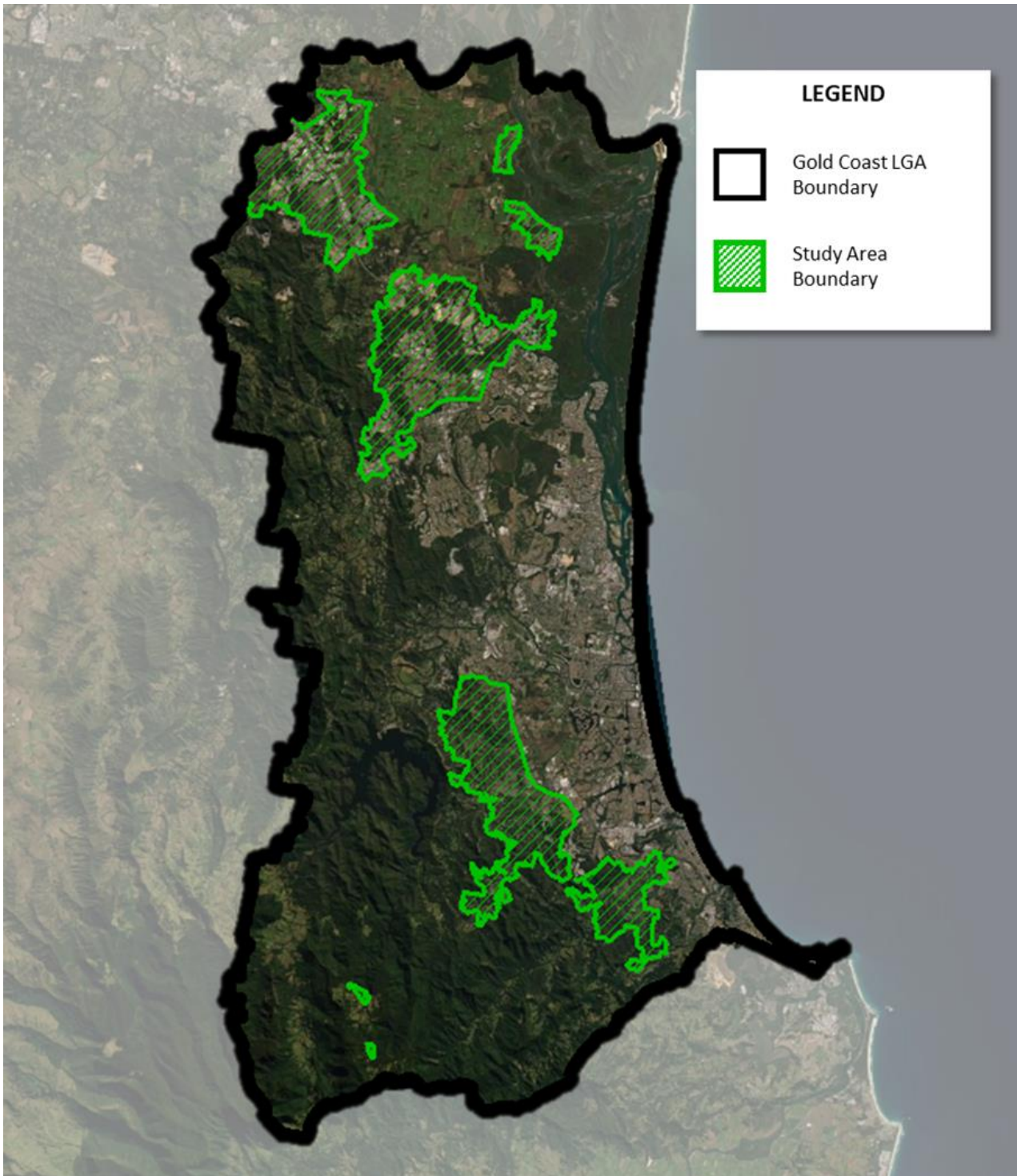


Figure 2: Study area

The analysis undertaken is parcel specific and is based on publicly available data sets produced by the Queensland Government and City of Gold Coast and aerial imagery produced by Nearmap as at April 2023.

The Gold Coast LGA's EUA boundary was defined based on:

- the information contained in ShapingSEQ;
- mapping of the EUA published by City of Gold Coast in support of the Gold Coast City Plan (Strategic Framework Map SFM-9);
- SA2 boundary data sourced from the Australian Bureau of Statistics; and
- cadastre published by the Department of Resources.

The Urban Footprint boundary was introduced into the GIS model to define the consolidation and expansion areas. Once the expansion area within the Urban Footprint was identified, this was extracted and defined as the 'study area'.

It is important to note that the EUA and Urban Footprint mapping has not changed since the publication of the 2020 Report and therefore, the areas assessed are identical.

The methodology utilised a four-phase sieve mapping exercise to analyse each parcel within the study area based on varying levels of detail and constraints. The four phases consisted of:

1. By the Book;
2. Special Cases;
3. Environmental Constraints; and
4. Economic Reality.

The full methodology is set out in the 2020 Report and has not been reproduced here to avoid duplication.

The only amendments made to the 2020 Report methodology are:

- latest data, valid as at April 2023, has been utilised in the preparation of this report as disclosed in **Appendix 1**; and
- the Queensland Government's Core Koala Habitat Area (CKHA) and Koala Priority Area (KPA) mapping overlays, introduced in February 2020 post-preparation of the 2020 Report, have been integrated into the Phase 3 – Environmental Constraints sieve for completeness.

The CKHA and KPA overlays have been added to the Phase 3 sieve due to their known impacts on developable area and the occasional additional footprint covered by the mapping when compared to the City Plan Environmental Significance Overlay and other State vegetation overlays.

To add the CKHA and KPA overlays to the Phase 3 sieve, the overlays were combined with the City Plan Environmental Significance Overlay (ESO) with those sections that do not overlap with the City Plan ESO having been subject to a separate step in the sieve process.

Similar to the assumptions applied to the ESO, while it is acknowledged that it may be possible to seek a performance outcome with respect to the CKHA mapping where not also located within a KPA, given the uncertainty surrounding what such an outcome may be and its likelihood of approval, the requirements of State Code 25 from the State Development Assessment Provisions (SDAP) have been applied explicitly.

We note that, as per Schedule 10, Part 10, Division 2, Section 16A of the Planning Regulation 2017, development on any land mapped within both the CKHA and KPA is prohibited development to the extent it does not comply with the limited exemptions provided under the Regulation.

FINDINGS

In order to determine the realistic dwelling supply within the Gold Coast LGA expansion area, the methodologies for Phases 1 – 4 were applied to the study area. The results of this assessment are discussed below.

Application of Phase 1

As identified in the 2020 Report, the Gold Coast LGA's expansion area comprises approximately 2,462ha of land contained within 16 suburbs across the LGA. It is relevant to note that this study has identified only approximately 1,954ha is potentially able to be developed for residential purposes, being a reduction of 508ha. This is largely owing to land being consumed for other non-residential purposes (eg. schools, hospitals, roads, parks, commercial development).

A majority of the land within the expansion area that accommodates planned dwelling supply based on the Phase 1 methodology is located within the Coomera area (see **Figure 3**). Cumulatively, Phase 1 of the study identified the potential for up to 57,194 dwellings to be developed within the Gold Coast LGA's expansion area, representing a decrease of 14,139 dwellings compared to the 2020 Report.

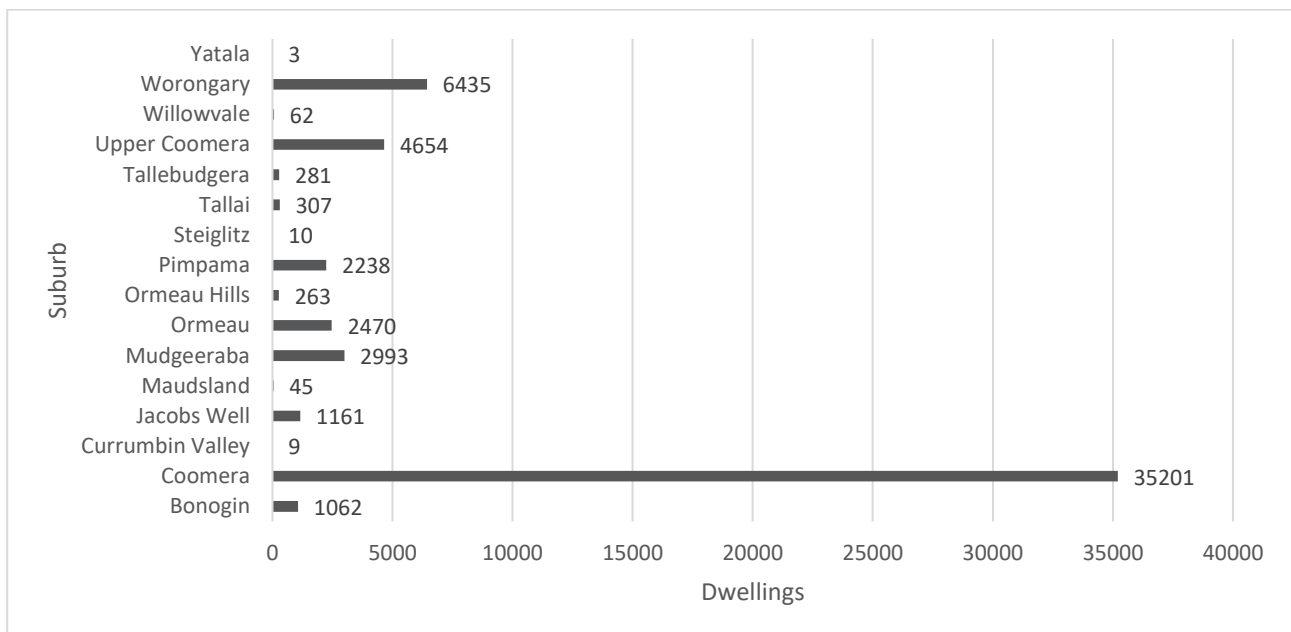


Figure 3: Phase 1 planned dwelling supply by suburb

Coomera remains the dominant suburb in terms of planned dwelling supply is not unusual given the history associated with the planned development of Coomera Town Centre and its periphery. Coomera is also the only location outside of the high-rise coastal spine between Broadbeach and Main Beach/ Surfers Paradise to benefit from an RD8 (one bedroom per 13m² or 380 dwellings per hectare) residential density designation.

Unsurprisingly, the distribution of planned dwelling supply based on suburb generally aligns with the planned dwelling supply based on City Plan Zones (see **Figure 4**). The Centre and Emerging Community Zones account for a majority of the potential dwellings with the 'mixed zoned' land surrounding the Coomera Town Centre also comprising a large portion of the potential supply.

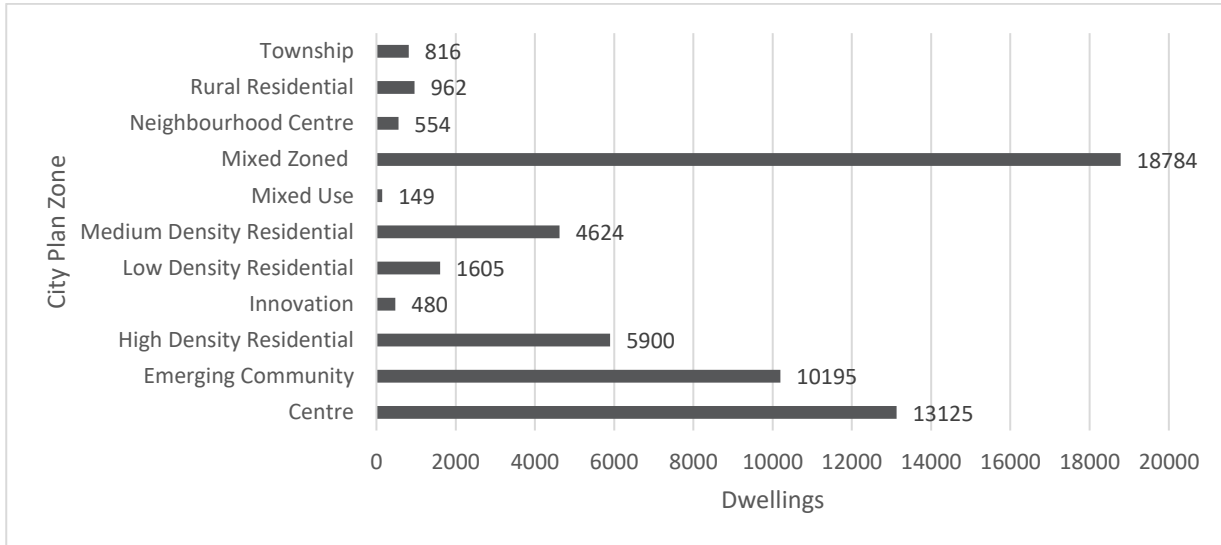


Figure 4: Phase 1 planned dwelling supply by City Plan Zone

The ‘mixed zoned’ land primarily refers to land surrounding the Coomera Town Centre to which several zones apply under the City Plan (see **Figure 5**). Where each zone over a parcel of land had a different residential density, the applicable density was applied to that area of the site.



Figure 5: Example of land within the study area affected by split zoning and density designations

Application of Phase 2

The second phase of the exercise resulted in a cumulative planned dwelling supply for the Gold Coast LGA expansion area of 435,608 dwellings, being a reduction of 21,586 dwellings from the Phase 1 yield. The Phase 2 yield also represents a decrease of 7,478 dwellings from the Phase 2 figure stated in the 2020 Report.

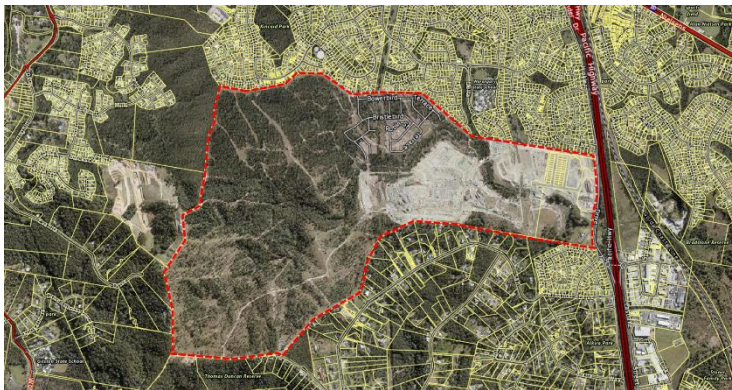
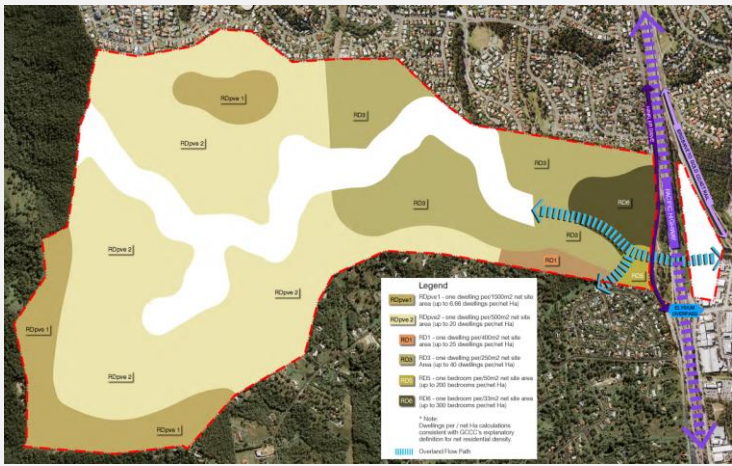
The most significant decreases from the Phase 1 yield were in the Innovation and Centre Zones. While land in the Innovation Zone is afforded a residential density designation under the City Plan, all of the land in that zone within the study area is either government owned (Coomera TAFE campus) or improved by an existing commercial development approval which has been acted on (Ormeau Innovation Zone). Similarly, by removing recently completed non-residential development from the Centre Zoned land, the potential dwelling supply within that zone was reduced. The majority of the planned dwelling supply (55%) remained in the Coomera area.

Existing large-scale development approvals, such as Sky Ridge in Worongary and Calypso Bay in Jacobs Well which have commenced and benefit from existing Preliminary Approval’s overriding the Planning Scheme

which assign alternative dwelling yields to those under the City Plan were taken into consideration to the extent of the non-completed stock. These major approvals are discussed in further detail below.


Skyridge, Worongary

Skyridge benefits from an existing Ministerial Call-in approval issued in 2015 for a master planned estate. The approval allows for residential development of a variety of densities ranging from 14 dwellings per hectare to 50 dwellings per hectare to be developed up to a maximum of 3500 dwellings within the estate.

Pacific View Estate, Worongary	
City Plan Zoning	Emerging Community Zone
City Plan Residential Density	20 dwellings per hectare
Approved Residential yield	3500 dwellings
Undeveloped yield	3500 dwellings (currently under construction)
Site Map	
Approved Residential Density Map	

Calypso Bay, Jacobs Well

Calypso Bay is a canal residential estate and golf course currently under construction in the northern Gold Coast suburb of Jacobs Well which benefits from an existing approval granted by the Planning and Environment Court in the early 2000’s for a Preliminary Approval Overriding the Planning Scheme. The precincts of under the Preliminary Approval have been somewhat carried forward into the current City Plan (v9), with a Calypso Bay Precinct unique to the estate created within the Low and Medium Density Residential Zones and overall dwelling density cap applied.

Calypso Bay, Jacobs Well	
City Plan Zoning	Low Density Residential and Medium Density Residential Zones (Calypso Bay Precinct)
City Plan Residential Density	20 dwellings per hectare (cumulative density not exceeding 1,852 dwellings)
Approved Residential yield	1,852 dwellings
Undeveloped yield	1,299 dwellings
Site Map	

In addition to the abovementioned larger development approvals, smaller approvals which remain current have also been included in this assessment. The details of these approvals were obtained through Council's PD Online database.

Application of Phase 3

The results of Phase 3 of the sieve exercise indicate that approximately 70% or 1,348ha of the land identified for development within Phase 2 of the study area is impacted by the Environmental Significance Overlay and Core Koala Habitat mapping combined.

Overall, Phase 3 of the study identified a total of 17,981 potential dwellings being able to be constructed within the study area. This equates to a reduction of 17,627 dwellings based on the Phase 2 results, being a significant decrease in the available dwelling supply within the study area. This also presents a reduction of 6,610 dwellings compared to the Phase 3 sieve in the 2020 Report.

Based on the wording contained within the Acceptable, Performance and Overall Outcomes and the Purpose Statement of the Environmental Significance Overlay Code and the Strategic Framework intent the City Plan seeks to:

- protect and enhance Wetlands, Waterways and their associated buffers;
- protect in situ High Priority and Regulated Vegetation across the city;
- protect in situ and enhanced MES to maintain flora and fauna diversity when inside a Biodiversity Area; and
- protect State and Local significant species and their habitat and minimised to the greatest extent possible any disturbance to medium and general priority vegetation when outside biodiversity areas.

These outcomes effectively limit development to areas located outside Wetland and Waterway buffers that are either:

- cleared; or
- medium and general priority vegetation with no State or Local significant species values and located outside a Biodiversity Area.

In addition, State Code 25 of the SDAP articulates the intent of the State’s CKHA mapping as ensuring that development:

- does not cause unacceptable impact on mapped koala habitat areas;
- is designed and located to avoid impacts or, where MSES cannot be reasonably avoided, minimise and mitigate impacts; and
- does not result in a significant residual impact on MSES unless the significant residual impact is deemed acceptable and an offset is provided.

As noted herein, where both the CKHA and KPA mapping overlap, any new development not complying with the exemptions provided in Schedule 10, Part 10 of the Planning Regulation 2017 is prohibited.

Figure 6 below illustrates the extent of impact each aspect of the Environmental Significance Overlay and CKHA Overlay has on the amount of potentially developable land within the city’s expansion area. Notably, only 38% of the study area is unconstrained by environmental overlays.

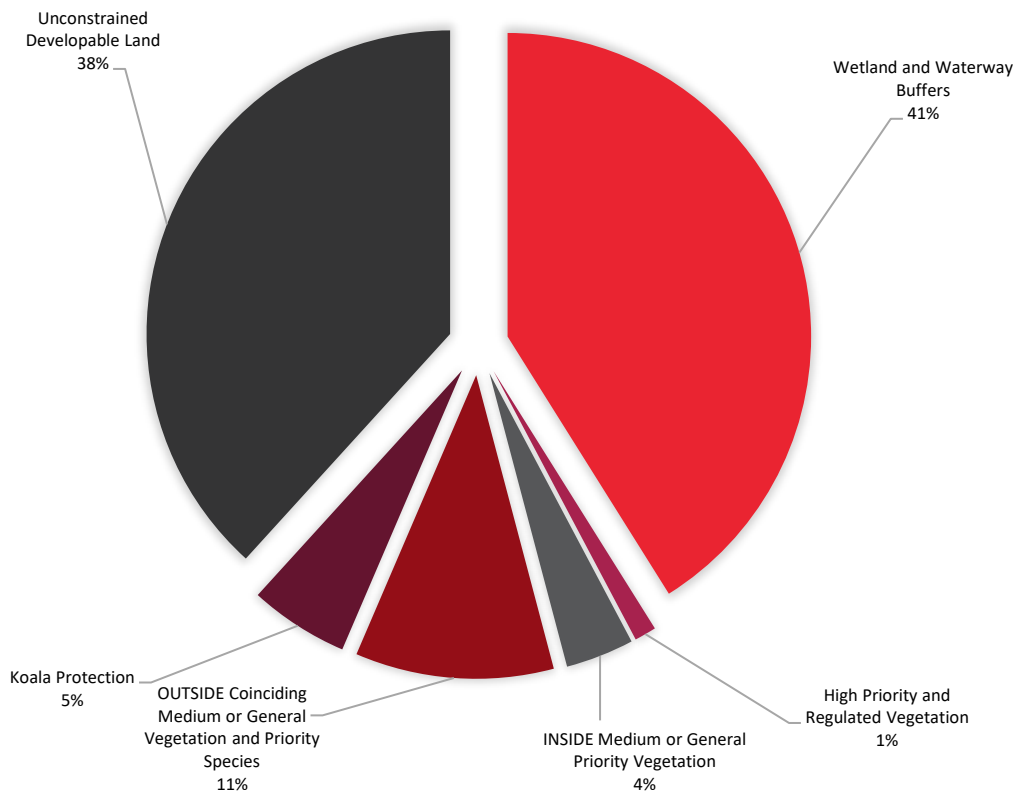


Figure 6: Proportional impact of environmental overlays on study area

Environmental Significance Overlay

The results indicated that the Environmental Significance Overlay (ESO) affects developable land across all land use zones, removing approximately 57% of the land area within the study area. The land use zone most affected by environmental constraints (69%), is land within the Rural Residential Zone, being subject to wetland and waterway buffers and the retention of medium and general vegetation inside biodiversity areas. Quantified in terms of dwellings, the ESO reduces the total potential dwelling supply within the study area by 14,326 dwellings to a total of 21,282 dwellings.

Table 1 reports the percentage of each zone impacted by environmental constraints with **Table 2** quantifying the extent of impact of environmental constraint overlays on a per-hectare basis.

Table 1: Percentage of developable land subject to Environmental Significance Overlay (cumulative percentage)

	City Plan ESO Constrained Land (Cumulative %)										
	CENTRE	EMERGING COMMUNITIES	HIGH DENSITY RESIDENTIAL	INNOVATION	LOW DENSITY RESIDENTIAL	MEDIUM DENSITY RESIDENTIAL	MIXED USE	NEIGHBOURHOOD CENTRE	RURAL RESIDENTIAL	RURAL RESIDENTIAL (RRLEP)	TOWNSHIP
Wetland and Waterway Buffers	40%	47%	45%	100%	41%	45%	65%	21%	35%	50%	49%
High Priority and Regulated Vegetation	2%	0%	1%	0%	0%	1%	0%	0%	1%	1%	7%
INSIDE Medium or General Priority Vegetation	0%	18%	0%	0%	0%	0%	0%	0%	3%	29%	0%
OUTSIDE Coinciding Medium or General Vegetation and Priority Species	13%	3%	11%	0%	1%	10%	0%	3%	19%	0%	6%
Cumulative Total	56%	67%	57%	100%	42%	56%	66%	24%	58%	80%	62%
Unconstrained Developable Land	32%	17%	44%	24%	65%	36%	40%	77%	43%	21%	38%

Table 2: Area of developable land subject to Environmental Significance Overlay (cumulative hectares)

	City Plan ESO Constrained Land (Cumulative ha)											
	CENTRE	EMERGING COMMUNITIES	HIGH DENSITY RESIDENTIAL	INNOVATION	LOW DENSITY RESIDENTIAL	MEDIUM DENSITY RESIDENTIAL	MIXED USE	NEIGHBOURHOOD CENTRE	RURAL RESIDENTIAL	RURAL RESIDENTIAL (RRLEP)	TOWNSHIP	Total
Wetland and Waterway Buffers	27.9	55.6	18.81	1.26	69.47	144.25	4.09	5.19	153.77	21.30	30.38	531.89
High Priority and Regulated Vegetation	1.57	0.09	0.51	0.0	0.63	3.45	0.0	0.04	4.10	0.52	4.14	15.05
INSIDE Medium or General Priority Vegetation	0.0	21.03	0.0	0.0	0.59	0.0	0.0	0	12.95	12.51	0.0	47.08
OUTSIDE Coinciding Medium or General Vegetation and Priority Species	9.33	3.13	4.49	0	1.56	31.79	0.01	0.65	82.16	0.05	3.72	136.85
Cumulative Total Constrained Land	38.69	38.21	23.8	1.26	72.24	318.39	4.1	5.87	438.8	43.02	61.44	730.87
Unconstrained Developable Land	30.5	38.66	18.02	0	98.81	138.9	2.16	19.04	185.83	8.65	23.21	536.78

In summary, the Environmental Significance Overlay affects approximately 57% of the land within the study area, equating to an area of approximately 730ha. This results in approximately 43% (563ha) of the study area being free from environmental constraints under the City Plan.

To illustrate the impact that the Environmental Significance Overlay has on the development potential of a site, **Table 3** below provides an example of where land has been zoned for residential development; however, when the Environmental Significance Overlay is applied, a strict application of the Overlay Code results in each site having no development potential.

Table 3: Example of Impacts of ESO Overlay

300 Yawalpah Road, Pimpama	
Site Area	40,000m ²
City Plan Zoning	Medium Density Residential Zone
Planned Residential Density	1 dwelling per 400m ² (20 dwellings per hectare)
Phase 1 & 2 Yield	99 dwellings
Application of Environmental Significance Overlay	
Phase 3 Yield	0 dwellings

The above is an example of an ‘extreme’ outcome following the application of the Phase 3 methodology. It should be noted that there are numerous examples of sites with reduced development potential following the application of the Phase 3 sieve. The feasibility of developing sites with ‘leftover’ portions has been considered through Phase 4 of this study.

Core Koala Habitat Area

In addition to the ESO, the CKHA overlay affects a further 68.54ha of land within the study area. Note, this in turn has the effect of reducing the total potential dwelling supply by a further 3,301 dwellings to a possible 17,981 dwellings. The main effects of this overlay are witnessed in the Rural Residential and Medium Density Residential Zones (see **Table 4**).

Table 4: Area of developable land subject to CKHA Overlay

	CKHA Constrained Land											
	CENTRE	EMERGING COMMUNITIE S	HIGH DENSITY RESIDENTIAL	INNOVATION	LOW DENSITY RESIDENTIAL	MEDIUM DENSITY RESIDENTIAL	MIXED USE	NEIGHBOURH OOD CENTRE	RURAL RESIDENTIAL	RURAL RESIDENTIAL (RRLEP)	TOWNSHIP	Total
CKHA (Cumulative ha)	2.774	0.451	1.74	0	2.129	10.687	0	0	48.89	1.216	0.655	68.542
CKHA (% of land assessed)	4%	0%	4%	0%	1%	3%	0%	0%	11%	3%	1%	5%

Table 5 below provides an example illustrating the combined impact of both the ESO and CKHA overlay mapping on a property that is zoned for residential development.

Table 5: Example of Impacts of ESO and CKHA Overlays

56 Clover Hill Drive, Mudgeeraba	
Site Area	831,800m ²
City Plan Zoning	Emerging Community Zone
Planned Residential Density	1 dwelling per 400m ² (20 dwellings per hectare)
Phase 1 & 2 Yield	1,662 dwellings
Application of Environmental Significance & CKHA Overlays	
Phase 3 Yield	107 dwellings

Therefore, cumulatively, the City Plan Environmental Significance Overlay and Core Koala Habitat Area mapping significantly impact the area of land potentially developable for residential purposes within the Gold Coast expansion area, reducing potential supply able to be delivered between now and 2041 to 17,981 dwellings.

Application of Phase 4

Based on the application of Phases 1-3 and consideration of the economic reality of residential development within the Gold Coast’s expansion area, Phase 4 of this study has concluded that the Gold Coast’s expansion area is potentially capable of providing up to 17,654 dwellings between now and 2041 based on the current planning controls and commenced but not completed development approvals.

Table 6 overleaf shows the available dwelling supply based on the City Plan Zones. Notably, the majority of the available supply is contained within the mixed-zoned land surrounding the Coomera Town Centre (26%), Emerging Community Zone (24%) and Centre Zone (17%).

Table 6: Potential dwellings in Gold Coast Expansion Area – grouped by City Plan Zone

ZONE	DWELLINGS	MARKET SHARE
Centre	3,013	17%
Emerging Community	4,308	24%
High Density Residential	1,694	10%
Innovation	86	0.5%
Low Density Residential	634	4%
Medium Density Residential	2,719	15%
Mixed Use	72	0.5%
Mixed Zoned	4,526	26%
Neighbourhood Centre	239	1%
Rural Residential	142	1%
Township	221	1%
Total	17,654	100%
Matusik Phase 5 Review June 2023		

When extrapolated based on suburb, the available dwelling supply primarily resides in Coomera (46%), owing to the increased mapped densities surrounding the Coomera Town Centre (see **Table 7**).

Table 7: Potential dwellings in Gold Coast Expansion Area – grouped by suburb

SUBURB	DWELLINGS	MARKET SHARE
Bonogin	413	2%
Coomera	8,099	46%
Currumbin Valley	3	0%
Jacobs Well	1,482	7%
Maudsland	19	0%
Mudgeeraba	900	5%
Ormeau	789	4%
Ormeau Hills	66	1%
Pimpama	861	5%
Steiglitz	6	0%
Tallai	78	1%
Tallebudgera	53	1%
Upper Coomera	1,366	8%
Willowvale	5	0%
Worongary	3,514	20%
Yatala	0	0%
Total	17,654	100%
Matusik Phase 5 Review June 2023		

Similar to the 2020 Report, Matusik has applied a 'Matusik Chance Rating' of high, medium and low likelihood of development occurring between now and 2041. The 'Matusik Chance Ratings' are explained as follows:

- **High** = >75% likelihood of development between 2023 and 2041
- **Medium** = 35% - 75% likelihood of development between 2023 and 2041
- **Low** = Less than 35% likelihood of development between 2023 and 2041

High Chance – includes sites that are either already owned by a development company(s) or are in areas where similar urban development is well advanced.

Medium Chance – includes sites that are held in private hands and makes, in Matusik’s opinion, some economic sense to redevelop. This doesn’t consider the owner’s intent or their expectations as to profit or timing.

Low Chance – includes sites which contain a very high expectation with regards to density. Such densities are already hard to develop near the coastline, along the light rail corridor and/or in existing established urban centre on the Gold Coast, let alone in inland locations. The economic reality and past track record suggests that high density development across much of the Gold Coast greenfield area is very unlikely to occur over the next decade or two (ie. prior to 2041). The ‘Low Chance’ category also captures sites which have an existing land use (eg. a shopping centre). The chance that an existing retail centre in a greenfield location, especially one with multiple owners and tenants, will be redeveloped into dwellings is low. Additionally, sites which have dramatically reduced developable area due to environmental constraints have also been allocated a low chance, as such sites are likely no longer economically viable.

In applying the ‘Matusik Chance Ratings to the study area, out of the total potential dwellings within the expansion area, 60% (10,542 dwellings) have a high chance of being developed by 2041. A further 22% (3,909 dwellings) have a medium chance of development within the same planning horizon. Approximately 18% or 3,203 dwellings have a low chance of being developed during the subject timeframe (see **Figure 7**). The shift in likelihood of dwellings being delivered between the 2020 Report and this study is a product of changes in market conditions and the heightened demand for housing both within the Gold Coast and throughout South East Queensland more generally.

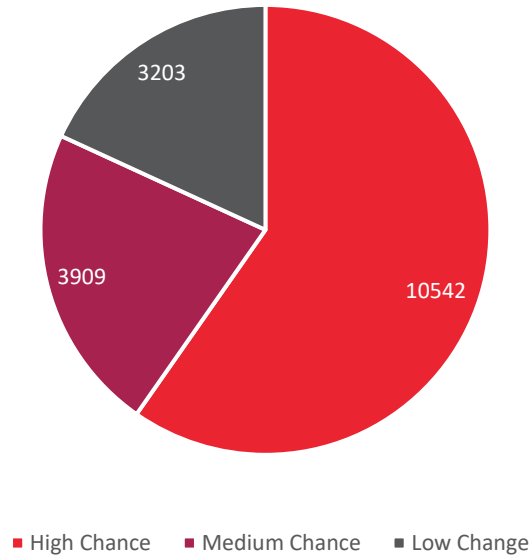


Figure 7: Matusik Chance rating split showing distribution of dwelling types by likelihood of being developed by 2041

EXPANSION AREA PLANNED DWELLING SUPPLY

As outlined herein, the LSDM Report 2021 identifies that the expansion area has a capacity to accommodate 35,123 dwellings and is realistically able to provide for up to 28,859 dwellings by 2041 (Department of State Development Infrastructure, Local Government & Planning, 2022). This study has determined that based on the application of current planning controls, the Gold Coast's expansion area is more likely to be able to provide up to 17,564 dwellings by 2041. Importantly, this falls below the adjusted 2041 benchmark of 19,212 dwellings set by ShapingSEQ (see **Figure 8**).

While the total potential dwellings able to be delivered in the study area by 2041 is 1,648 dwellings less than the ShapingSEQ benchmark, when focusing on the dwellings with a high chance of actually being delivered by 2041, the figure is some 8,670 dwellings less than the benchmark and approximately half of the 'realistic availability' assessed in the 2021 LSDM.

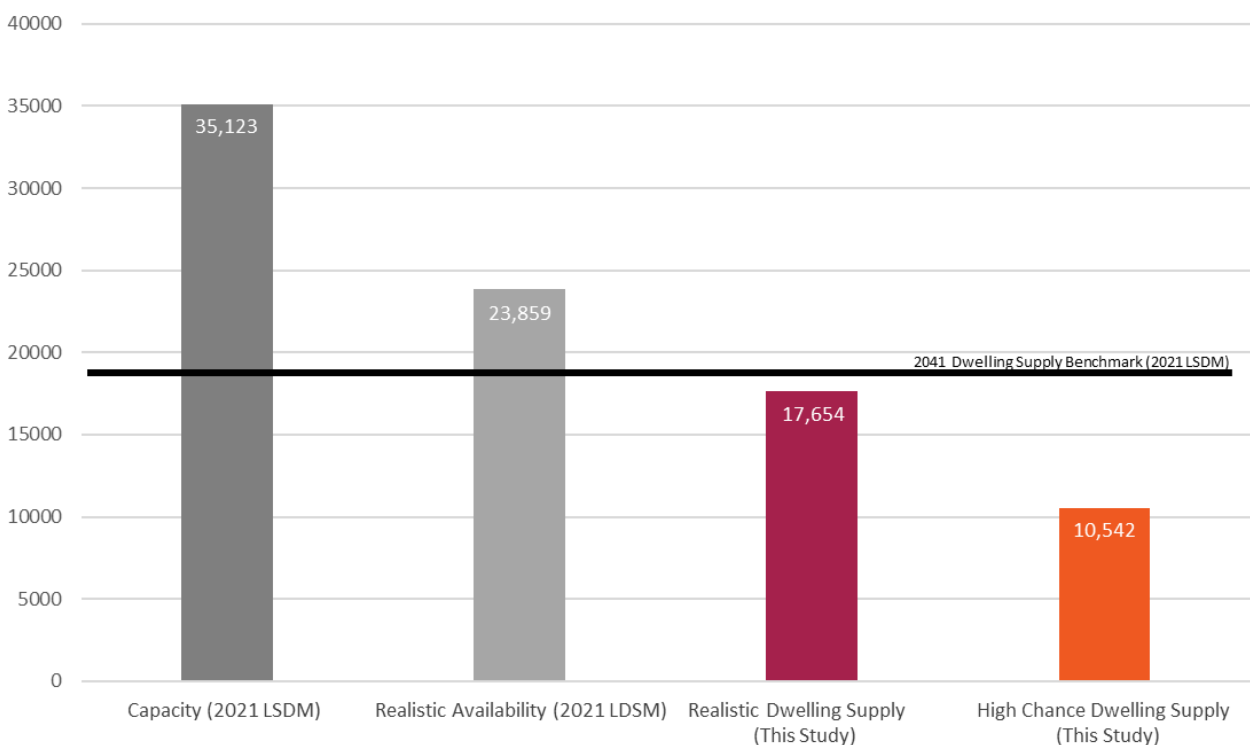


Figure 8: Comparison of LSDM Dwelling Assumptions, SEQRP Benchmark and findings of this study

Of the 17,564 dwellings able to be provided in the expansion area, approximately 44% of the total available supply is within the Centre and High Density Residential zoned land surrounding the Coomera Town Centre. Overall, approximately 50% of the total available dwelling supply in the expansion area is located within three individual development sites, being Skyridge (Worongary), Calypso Bay (Jacobs Well) and Coomera Quarter/Coomera Woods (Coomera). Outside of these areas, the balance of the city's expansion area accommodates only 29% (5,020 dwellings) of the total potential dwelling supply (see **Figure 9**).

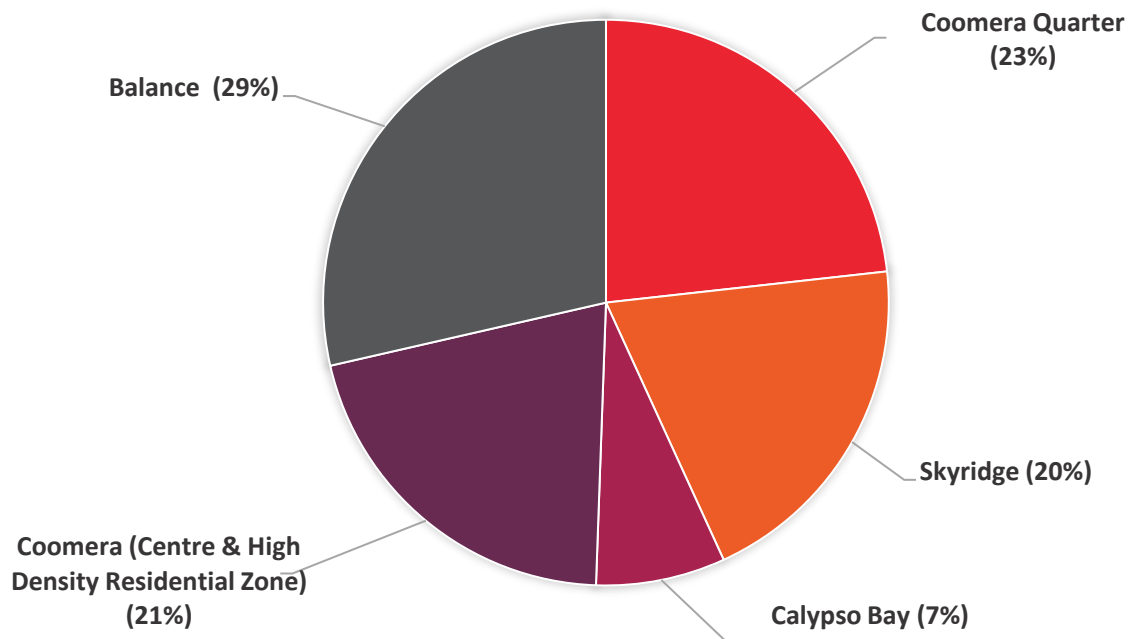


Figure 9: Dwelling supply distribution throughout expansion area

Over the past 10 years, there has been an average of 1,680 new residential lots registered per annum across the Gold Coast expansion area. A majority (82%) of these new lots have traditionally been in the detached dwelling category (ie. less than 25 dwellings per hectare). When considered on a dwelling typology basis over the same 10 year period, the average demand is divided as per **Table 8**.

Table 8: Average per annum demand per dwelling type over past 10 years

DENSITY	DEMAND
Under 5 dwellings/ ha	90 dwellings pa (or 5%)
6 to 25 dwellings/ ha	1,290 dwellings pa (or 77%)
Over 26 dwellings/ha	300 dwellings pa (or 18%)

When this is applied to the dwellings in the high chance category, the yield can be broken down as follows:

- 4,808 dwellings under 25 dwellings per hectare; and
- 5,734 dwellings over 25 dwellings per hectare.

Based on the average annual lot registrations in the expansion area over the past 10 years, the dwellings in the high chance category **provide approximately 6.3 years of supply**.

Significantly, the future supply of housing at densities of 25 dwellings per hectare or less is limited; however, demand for such product is anticipated to remain very high based on past trends. This **equates to less than 4 years of supply for dwellings at a density up to 25 dwellings per hectare**.

Most of the housing demand (80%) over 25 dwellings per hectare is likely to be satisfied in the consolidation area on the Gold Coast, being within the city's existing urban area and typically in established centres, along the light rail corridor or near the beach/canals. The historically low demand for higher-density housing (ie. over 25 dwellings/ ha) in the expansion area means that the assessed available supply of such product in the high chance category is likely to be sufficient to meet demand for that product type through to 2041.

As evidenced above, the current planning controls and density assumptions place a significant reliance on higher density residential development occurring around the Coomera town centre in order to facilitate the delivery of a majority of the new dwellings within the Gold Coast's expansion area; however, the current market demand is primarily for detached dwellings at a density of up to 25 dwellings per hectare and this is anticipated to continue over at least the next 10 years.

Planned Additional Supply

It is acknowledged that on 4 July 2023, City Plan version 10 commenced operation. This version of the City Plan includes the rezoning of approximately 118ha of land on Courtney Drive, Upper Coomera. The Courtney Drive Investigation Area has been the subject to various studies and structure plans prepared by Council since circa 2014 and has resulted in the rezoning of previously Rural and Rural Residential zoned land to the Emerging Community Zone. Based on the reporting completed by Council and published in 2017, the Courtney Drive Investigation Area has the potential to accommodate between 499 and 715 new dwellings.

While the Courtney Drive Investigation Area is located in the expansion area, due to the timing of this report being prepared (as at April 2023), it has not been factored into the calculations herein. It is acknowledged that land release has the potential to increase developable land and, in turn, dwelling supply; however, it is not the sole solution to the current undersupply of dwellings within the expansion area.

In June 2023, Council granted an approval for the creation of 196 residential lots at the southern end of the Courtney Drive Investigation Area. Operational Works applications have already been submitted to Council for the first of the five approved stages. While it is acknowledged that this development, once acted upon, will contribute to the available supply of detached housing stock within the expansion area, it alone will not immediately resolve the shortage of developable residential land within the expansion area to accommodate the forecast growth through to 2041.

CONCLUSION

This report has been prepared to determine the realistic availability of land within the Gold Coast local government area's expansion area to accommodate residential development through to 2041. In particular, this report analyses the existing development potential of land based on the local and State planning controls applicable to the Gold Coast expansion land as at April 2023.

The analysis herein has been completed via a comprehensive sieve mapping exercise undertaken by Zone Planning Group, Biome Consulting and Zone Landscape Architecture to identify the study area, applicable planning controls, calculate planned residential densities and apply environmental constraints which may inhibit future development. This analysis focused only on the Code Assessable development outcomes achievable under the relevant provisions of the Gold Coast City Plan (v9) and the planned residential densities allowed for under both the City Plan and Planning Assumptions associated with the Gold Coast Local Government Infrastructure Plan.

Following the identification of the total developable area within the Gold Coast's expansion area, Matusik Property Insights undertook a final review to determine the economic reality and likelihood of the planned dwelling yield being delivered by 2041.

This assessment has determined that, cumulatively, the Gold Coast expansion area has the capacity to accommodate up to 17,564 dwellings up to 2041, significantly less than that identified by the 2021 LSDM Report. Of this supply, only 10,542 dwellings have a high chance of being developed by 2041 based on current and forecast market trends. This is comprised of 4,808 dwellings under 25 dwellings per hectare and 5,734 dwellings over 25 dwellings per hectare.

In addition to significantly differing from the figures contained in the past LSDM Reports, this analysis has demonstrated that the Gold Coast's expansion area does not have capacity to accommodate the dwelling target for the expansion area (31,000 new dwellings by 2041) anticipated under ShapingSEQ.

Based on the dwellings that have a high chance of being delivered by 2041 and the annual average dwelling demand for new housing stock, the Gold Coast expansion area provides approximately 6.3 years of supply.

Significantly, with the increased demand for detached housing stock (ie. densities of 25 dwellings per hectare or less), it is anticipated that there is less than 4 years of supply of land accommodating 25 dwellings per hectare remaining within the expansion area.

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APPENDICES



APPENDIX 1

Spatial Data Sources



Appendix 1 - Spatial Data Sources

GIS LAYER	SOURCE
Hinterland Core Habitat System; Substantial Remnants; Coastal Wetlands & Core Habitat System	Gold Coast Open Data
Hinterland to Coast Critical Corridor	
Local Significant Species	
State Significant Species	
Vegetation Management	
Waterways	
Wetlands	
Consolidation Area	
Extractive Resources Special Management Area	
Flood Assessment Required	
Flood Levels	
Gold Coast Cadastre	
Gold Coast Cadastre (April 2023)	Queensland Spatial
Landslide Hazard	Gold Coast Open Data
LGA Boundary	Queensland Spatial
Base Imagery (April 2023)	Nearmap
Regulated Vegetation	Queensland Spatial
Core Koala Habitat Area	Queensland Spatial
Residential Density	Gold Coast Open Data
SEQRP Regional Land Use Categories	Queensland Spatial
State Significant Species	Gold Coast Open Data
Statistical Areas Level 2	Australian Bureau of Statistics
Suburbs	Gold Coast Open Data
Zoning	



APPENDIX 2

Zoning and Density Considerations



Appendix 2 - Zoning & Density Considerations

The following rules relate to assumptions for residential density under the City Plan Zones that are identified as 'residential zones' and 'non-residential zones' for the purpose of this study.

Residential Zones		
City Plan Zone	Associated Density	Methodology
Low Density Residential zone	16 dwellings per hectare	Extract corner lots exceeding 800m ² in area and assume that these can be developed for 2 x dwellings. If in LDR and a Residential Density (RD) overlay is applicable (only RD1 is applicable) include all allotments exceeding 800m ² and assume that they can be subdivided/ developed for 1 dwelling per 400m ² . Any large LDR site that is not a corner site, divide site area by 600m ² to determine code assessable ROL yield. The CoGC LGIP assigns a yield of 16 dwellings/ha.
Medium Density Residential Zone	RD1-8 Or default 20 dwellings per hectare	<p>Look at residential density (RD) maps to see where they coincide with this zone. If there is no RD map, identify sites exceeding 800m² to assume that each lot can be subdivided/ developed for 1 dwelling/lot per 400m². This applies to <u>all</u> lots exceeding 800m², not just corner lots.</p> <p>Where an RD Overlay applies, the following yield is assumed (from CoGC LGIP):</p> <ul style="list-style-type: none"> • RD1 – equates to 25 dwellings/ ha • RD2 – equates to 33 dwellings/ ha • RD3 – equates to 40 dwellings/ ha • RD4 – equates to 50 dwellings/ ha • RD5 – equates to 100 dwellings/ ha • RD6 – equates to 150 dwellings/ ha • RD7 – equates to 200 dwellings/ha • RD8 – equates to 385 dwellings/ha <p>The RD1-RD8 dwelling yield based on planning assumptions adopted in the CoGC LGIP.</p>
High Density Residential Zone	RD1-8 Or default 20 dwellings per hectare	Process as per approach for Medium Density Residential Zone. The RD1-RD8 dwelling yield based on planning assumptions adopted in the CoGC LGIP.
Rural Residential Zone	2.5 dwellings per hectare	Identify lots with a minimum area of 16,000m ² (1.6Ha) and assume that two or more 8000m ² allotments with one dwelling each can be established. Equates to 2.5 dwellings/ha.
Rural Residential Zone (Rural Residential Landscape & Environment Precinct)	0.3125 dwellings per hectares	Identify lots with a minimum area of 32,000m ² and assume that 2 or more 16,000m ² allotments with one dwelling each can be established.
Neighbourhood Centre Zone	RD1-8 Or default	If not on the RD maps identify all lots with an area of 800m ² or more and assume 1 dwelling/ allotment per 400m ² .

	20 dwellings per hectare	
Innovation Zone	RD1-8 Or default 20 dwellings per hectare	If not on the RD maps identify all lots with an area of 800m ² or more and assume 1 dwelling/ allotment per 400m ² .
Centre Zone	RD1-8 Or default 20 dwellings per hectare	Identify RD category and divide site area by assumed bedrooms per dwelling on the basis that all centre zone land in study area is RD5 or higher.
Mixed Use Zone	RD1-8 Or default 20 dwellings per hectare	Either apply the applicable RD category or identify sites with a minimum 800m ² area and assume 1 dwelling per 400m ² .
Township Zone	16 dwellings per hectare	Either apply RD category or identify sites exceeding 800m ² and assume 1 dwelling per 400m ² . Equates to 16 dwellings/ha under the LGIP
Emerging Community Zone	20 dwellings per hectare	All development triggers impact assessment but it would be unreasonable to excludes it all on that basis. Look into each zone specifically including investigation of all approvals commenced as per Nearmap (as at April 2023). Equates to 20 dwellings/ha under the LGIP.

Non-Residential Zones		
City Plan Zone	Associated Density	Methodology
Major Tourism Zone	N/A	This zone is excluded from the study as it does not anticipate permanent residential development.
Limited Development Zone	N/A	Only applies to a small area west of the Pacific Motorway. As all development in this zone is impact assessable, any assumptions re density won't conform to our normal rules. This zone is excluded from the LGIP planning assumptions and therefore has been excluded from this exercise.
Low Density Residential Zone (Large Lot Precinct)	N/A	Exclude the whole of this zone as it does not allow for further subdivision.
Mixed Use Zone (Fringe Business Precinct)	N/A	This zone has been excluded from the study as it does not anticipate residential development.
Rural Zone	N/A	Identify lots with a minimum area of 200Ha and assume that 2 x 100Ha allotments can be established (where outside of the precinct). It was identified that lots of this size do not exist within the study area. Additionally, land in the Rural Zone (Rural Landscape & Environment Precinct) is identified as having no subdivision potential under the City Plan. Therefore, both the Rural Zone and Precinct are to be excluded from this exercise.
Rural Zone (Rural Landscape & Environment Precinct)	N/A	
Open Space Zone	N/A	Exclude the whole of this Zone as residential development is not expressly contemplated within this Zone under City Plan.
Sport & Recreation Zone	N/A	
Low Impact Industry Zone	N/A	
Medium Impact Industry Zone	N/A	

High Impact Industry Zone	N/A	
Waterfront Industry Zone	N/A	
Community Facilities Zone	N/A	
Township Zone (Large Lot Precinct)	N/A	Exclude the whole of this zone as it does not allow for further subdivision.
Conservation Zone	N/A	Exclude the whole of this Zone as residential development is not expressly contemplated within this Zone under City Plan.
Extractive Industry Zone	N/A	



APPENDIX 3

Economic Assessment



1. Key findings

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- There are 17,654 dwellings across the greenfield expansion area on the Gold Coast that have a chance of being developed over the next 18 years.
- The breakdown of this potential dwelling supply by chance is:
 - **High chance** 10,542 dwellings or 60%
 - Medium chance 3,909 dwellings or 22%
 - Low chance 3,203 dwellings or 18%
- Most of this land is held across five zoning types being:
 - Mixed Zone 4,526 dwellings or 26%
 - Emerging Community 4,308 dwellings or 24%
 - Centre 3,013 dwellings or 17%
 - Medium Density Residential 2,719 dwellings or 15%
 - High Density Residential 1,694 dwellings or 10%
- When it comes to the supply with a **high chance** of happening between 2023 and 2041, this supply is broken up by this housing density:
 - Under 5 dwellings/ha 24 dwellings or 0%
 - 6 to 25 dwellings/ha 4,784 dwellings or 45%
 - Over 26 dwellings/ha 5,734 dwellings or 55%
- When including **all potential dwellings**, this supply – by housing density is:
 - Under 5 dwellings/ha 522 dwellings or 3%
 - 6 to 25 dwellings/ha 6,914 dwellings or 39%
 - Over 26 dwellings/ha 10,218 dwellings or 58%

- Over the past ten years, there has been, on average, **1,680 new residential lots registered per annum** across this greenfield area.
- Yet this annual housing demand – i.e., lot registrations – over this ten year period has been broken up as follows:
 - Under 5 dwellings/ha 90 dwellings pa or 5%
 - 6 to 25 dwellings/ha 1,290 dwellings pa or 77%
 - Over 26 dwellings/ha 300 dwellings pa or 18%
- A quick summary – again based on the **high chance** of new housing provision – suggests that the 10,542 dwellings will last some **six years (6.3 years)** when divided by 1,680 net lot registrations.
- Overall – when factoring in **all possible dwellings** – totalling some 17,654 homes, then there is **ten and half years supply**.
- This 10.5 years supply is way short of the 18 year time frame between 2023 and 2041.
- Yet when looking at this supply and local historical demand by housing type – and when looking to just the **high chance stock** – the supply and demand equation changes substantially:
 - Under 5 dwellings/ha: 24 dwellings vs 90 dwellings pa = 3 months
 - 6 to 25 dwellings/ha: 4,784 dwellings vs 1,290 dwellings pa = 3.7 years
 - Over 26 dwellings/ha: 5,734 dwellings vs 300 dwellings pa = 19 years
- Moreover, when including **all potential dwellings**, the supply and demand equation is as follows substantially:
 - Under 5 dwellings/ha: 522 dwellings vs 90 dwellings pa = 5.8 years
 - 6 to 25 dwellings/ha: 6,914 dwellings vs 1,290 dwellings pa = 5.4 years
 - Over 26 dwellings/ha: 10,218 dwellings vs 300 dwellings pa = 34 years
- There isn't enough land available across the greenfield expansion area to supply for the housing types the market wants and can afford. This location – based on past trends – will run out of suitable land within the next five or six years.

2. Supporting information

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Gold Coast: Greenfield supply by Matusik rating

Matusik rating	Land parcels	Total ha	Dwelling yield
High	22	575	10,542
Medium	48	161	3,909
Low	1,088	394	3,203
Total	1,158	1,129	17,654
Matusik Phase 5 Review June 2023			

Matusik Chance Ratings

- **High** = 75% + likelihood of development between 2023 and 2041
- **Medium** = 35% to 75% likelihood of development between 2023 and 2041
- **Low** = Less than 35% likelihood of development between 2023 and 2041

The **high chance** sites are either already owned by development companies or are in areas where similar urban development is well advanced.

The **medium chance** category includes sites that are held in private hands and makes – in my opinion – some economic sense to redevelop. Of course, this doesn't consider the owner's intent or their expectation as to profit or timing.

The **low chance** segment includes sites which contain a very high expectation with regards to density. Such sites are already hard to develop near the beach, along the light rail corridor and/or in existing established urban centres on the Gold Coast. The economic reality and past track record suggest that high density development across much of the Gold Coast greenfield area is very unlikely over the next decade or two.

Also, sites which have an existing land use - like a shopping centre - have also been placed in the low category. The chance that an existing retail centre in a greenfield location - and especially one with multiple owners and tenants - will be redeveloped into dwellings is low.

Likewise, sites which have been reduced dramatically in terms of dwelling yield due to environmental and other town planning overlays has also been allocated to the low pile as well, as these are probably no longer economically viable.

Gold Coast: Greenfield supply by zone

Zone	Dwellings	Market share
Centre	3,013	17%
Emerging Community	4,308	24%
High Density Residential	1,694	10%
Innovation	86	0.5%
Low Density Residential	634	4%
Medium Density Residential	2,719	15%
Mixed Use	72	0.5%
Mixed Zoned	4,526	26%
Neighbourhood Centre	239	1%
Rural Residential	142	1%
Township	221	1%
Total	17,654	100%
Matusik Phase 5 Review June 2023		

Gold Coast: Greenfield supply by suburb

Suburb	Dwellings	Market share
Bonogin	413	2%
Coomera	8,099	46%
Currumbin Valley	3	0%
Jacobs Well	1,482	7%
Maudsland	19	0%
Mudgeeraba	900	5%
Ormeau	789	4%
Ormeau Hills	66	1%
Pimpama	861	5%
Steightz	6	0%
Tallai	78	1%
Tallebudgera	53	1%
Upper Coomera	1,366	8%
Willowvale	5	0%
Worongary	3,514	20%
Yatala	0	0%
Total	17,654	100%
Matusik Phase 5 Review June 2023		

Gold Coast: Greenfield supply by housing density

Housing density	Matusik ratings			
	High	Medium	Low	Total
Under 5 dwellings/ha	24	143	355	522
6 to 25 dwellings/ha	4,784	457	1,673	6,914
Over 26 dwellings/ha	5,734	3,309	1,175	10,218
Total	10,542	3,909	3,203	17,654
Matusik Phase 5 Review June 2023				

Gold Coast: Greenfield net lot registrations by housing density

Years ending March	Housing density – dwellings per hectare			Total
	Under 5	6 to 25	Over 26	
2014	51	898	110	1,059
2015	38	1,374	250	1,662
2016	67	2,581	350	2,998
2017	190	2,321	295	2,806
2018	83	1,889	426	2,398
2019	125	1,573	429	2,127
2020	128	1,020	311	1,459
2021	44	509	376	929
2022	54	371	133	558
2023	94	366	316	776
Average	90	1,290	300	1,680
Queensland Treasury, as of 27 th June 2023.				

3. Matusik Property Insights

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Matusik Property Insights Pty Ltd is an **independent consultancy**, providing detailed residential market research and analysis for industry, government, companies and, in some instances, individuals.

Michael Matusik is the owner and director of Matusik Property Insights, and he is seen by many as a ‘voice of reason amongst the distortion’ and his firm prides itself as a trusted source of property analysis.

Michael is a qualified Town Planner with a First Class Regional and Town Planning Honours Degree (1986) from the University of Queensland.

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Typical data sources

- Domain, powered by APM (i.e., Price Finder)
- Queensland Government, various
- SQM Research
- BCI Australia
- ABS Census and other ABS publications
- Matusik Database including Matusik estimates

4. Disclaimer

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