

TEMPORARY LOCAL PLANNING INSTRUMENT - BRIEFING PAPER

Stage 3 Gold Coast Light Rail Corridor



This report was prepared by Zone Planning Group in collaboration with DBI Architecture and Rider Levett Bucknall.

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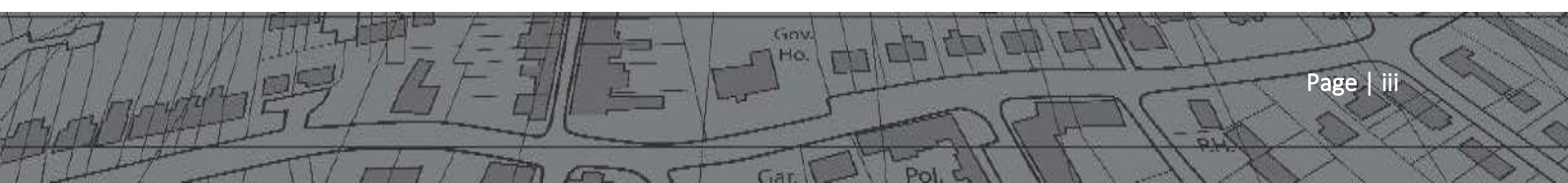


Contents

Introduction	1
1.0 Recommendation	2
2.0 Temporary Local Planning Instruments	3
2.1 What is a TLPI?	3
2.2 Why Propose a Ministerial TLPI?	3
2.3 Process for implementing a TLPI?.....	4
2.4 Can TLPI’s be used to increase housing supply and has this approach been used before?.....	4
3 Background	5
4 Study Area.....	7
4.1 Review of Concept Plans	8
4.2 Consideration to SEQRP Dwelling Supply Target	9
4.3 Balance of Stage 3 Light Rail Neighbourhood.....	9
5 The Base Case	10
5.1 Observations of the Base Case	10
5.2 Dwelling Supply Estimate	10
5.3 Key Findings.....	14
6 Where to from Here	17
7 The Alternative Case	18
7.2 Consideration to 50% Uplift	19
7.3 Resolution of Alternative Case	20
7.4 Key Findings & Comparison to ‘Base Case’	23
8 Recommendation.....	25
8.1 City Plan Considerations for TLPI	25

Attachments

Attachment 1	Stage 3 Light Rail Neighbourhood Framework Concept Plan – Base Case
Attachment 2	Stage 3 Light Rail Neighbourhood Framework Concept Plan – Alternative Case





Introduction

The briefing paper provides a summary of how a Ministerial Temporary Local Planning Instrument (TLPI), made under the *Planning Act 2016* could effectively assist in rapidly implementing additional dwelling supply along the Stage 3 Light Rail Corridor.

The purpose of a Ministerial TLPI in this instance would be to rapidly expand the future supply of dwellings along the corridor, in a manner which is years faster than a standard Planning Scheme amendment; to address Gold Coast Council's dwelling supply obligations under the Business Case for the Stage 3 light rail corridor, and to assist in meeting the City's 2021-2046 SEQRP dwelling supply obligations.

For context, the SEQRP release in December 2023 sets a new dwelling growth target of 161,700 by 2046. 100,274 (or 62%) of these new dwellings are required to be delivered as high-rise dwelling, defined as 9+ storeys. The SEQRP dwelling growth targets are a mandatory requirement which SEQ Local Governments must demonstrate that all new Planning Schemes can achieve. A Planning Scheme failing to plan for the SEQRP target may not receive sign-off from the Planning Minister.



1.0 Recommendation

In acknowledging that a new Gold Coast Planning Scheme is not anticipated to be implemented, at earliest, until 2027, and the ongoing and increasing dwelling supply/affordability crisis, it is recommended that the Planning Minister (with Council's support) urgently progress a Temporary Local Planning Instrument responding to State Interest: Housing Supply and Diversity.

It is recommended that the Ministerial TLPI:

- Apply over the Stage 3 Light Rail Neighbourhood Framework – Broadbeach to Burleigh Heads Corridor as published by Council in August 2021.
- Be implemented without the need for community consultation given the criticality of the issue at hand.
- Set a Dwelling Growth Target of 30,200 additional dwellings by 2046 (noting a TLPI only remains in effect for 2 years) for the Stage 3 Light Rail Neighbourhood Framework area.
- Adopt the Alternative Case Building Height Map (**Attachment 2**), increasing building height designations along the corridor to accommodate increased residential density and to achieve a suitable mix of dwelling typologies required by the SEQRP.
- With the exception of Key Sites, mapped building heights are the envisaged maximum building height.
- Introduce qualifying criteria for Key Sites to benefit from an increased building height uplift relative to the mapped building height and remain as Code Assessable development.
- Ensure that revised mapped building heights do not prejudice existing development rights/opportunity to seek the 50% building uplift.
- Ensure that all development applications within the revised mapped building height designation are afforded proportional building height uplift for qualifying key sites, remain Code Assessable, so as to assist in the quick delivery of dwelling supply.

It is recommended that the QLD Planning Minister urgently engage the Department or a suitably experienced third party consultancy, that is not based on the Gold Coast, to prepare the TPLI at the earliest possible opportunity.

It is noted that the Queensland State election must occur no later than 26 October 2024, meaning that a caretaker period would be initiated no later than 26 September 2024 during which no significant Ministerial decision may be made. This timeframe suggests that a Ministerial TLPI is the necessary approach.



2.0 Temporary Local Planning Instruments

2.1 What is a TLPI?

A Temporary Local Planning Instrument (TLPI) is a statutory instrument created under the provisions of the Planning Act 2016. While a TLPI is in effect:

- › The TLPI suspends and affects the operation of the City Plan provisions as identified in the TLPI.
- › To the extent of any inconsistency between the City Plan and the TLPI, the TLPI applies instead.

A TLPI deals with a specific, often localised issue. Once made, Local Government is allowed time (up to two years) to incorporate a TLPI into their local Planning Scheme (if required).

A Local Government may prepare a temporary local planning instrument (TLPI) to respond to changing and emerging planning issues.

Alternatively, the Planning Minister also has the ability and discretion to make a TLPI under the Planning Act to protect, or give effect to, a State interest. Notably, the State Planning Policy raises 'Housing Supply and Diversity' as a State interest.

2.2 Why Propose a Ministerial TLPI?

A Ministerial Temporary Local Planning Instrument is a statutory planning instrument that allows the Planning Minister to quickly respond to change and emerging planning issues.

Historically TLPI's have been used to limit development potential and prevent certain development outcomes from being achieved, but they may equally be used to encourage and promote desirable development outcomes. Such an example is the recently implemented Kurilpa Sustainable Growth Precinct TLPI in the Brisbane City Council area.

The TLPI varies the Local Government Planning Scheme to the extent identified within the document. A TLPI takes effect for a 2-year period in which it is expected that the overarching Planning Scheme is amended.

A TLPI allows for a prompt policy response to be implemented, often acknowledging that a lengthy plan making process is required to draft new Planning Schemes.

In the context of the Gold Coast, a TLPI is considered a practical tool to promptly respond to the growing housing supply and affordability crisis given the City of Gold Coast's commitment to prepare a new Planning Scheme envisaged to be implemented by 2027, some three years away.



2.3 Process for implementing a TLPI?

Typically, where a Local Government seeks to propose a TLPI, the process is set out within Chapter 3 of the Minister's Rules and Guidelines. Briefly, the process for making a TLPI is summarized as follows:

- Council decides to make a TLPI.
- Council prepares and provides proposed TLPI to Planning Minister (Minister), which includes:
 - The TLPI documents
 - A statement including—
 - a) why the Local Government proposes to make or amend the TLPI; and
 - b) how the proposed TLPI or TLPI amendment complies with section 23(1) or (2) of the Act.
 - c) Any background studies or reports that informed the preparation of the proposed TLPI or TLPI amendment.
- Minister considers TLPI within 20 business days from receiving TLPI from Council.

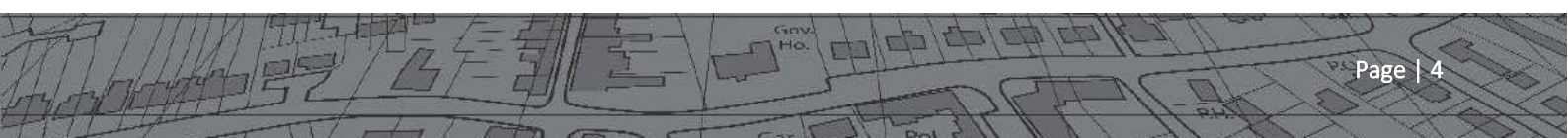
It is also noted that a statutory pathway also exists for the Planning Minister themselves to implement a TLPI (known as a Ministerial TLPI) which would have the same effect as altering part of a Local Government Planning Scheme. This process does not require any Local Government involvement and can be implemented fairly quickly. The most recent example of the Minister exercising this discretion is the implementation of the Kurilpa Sustainable Growth Precinct in Brisbane.

2.4 Can TLPI's be used to increase housing supply and has this approach been used before?

Whilst historically, and including in the Gold Coast, TLPI's have primarily been implemented to address natural hazard State Interests or Heritage matters, a TLPI may be used to any relevant State Interest, including housing supply and affordability as recognised through the State Planning Policy.

Notably, TLPI's have been recently utilised by both Local Governments and the Planning Minister to address housing supply and affordability through the following examples:

- Kurilpa Sustainable Growth Precinct (Planning Minister for Brisbane City Council)
- Caboolture West Emerging Community (now repealed) (Moreton Bay City Council)
- Housing Supply Assistance Measures (Toowoomba Regional Council)





3 Background

As Council are aware, the most recent SEQRP adopted in December 2023 sets a Dwelling Target for the Gold Coast of 161,700 dwellings within the 2021 to 2046 period.

The SEQRP then breaks this target down into four different dwelling typologies which each have their own target, including:

- Detached Dwellings (1-2 storeys) 11% (17,787 dwellings)
- Low-Rise Attached Dwellings (1-3 storeys) 17% (27,489 dwellings)
- Medium-Rise Attached Dwellings (4-8 storeys) 10% (16,170 dwellings)
- High-Rise Attached Dwellings (9+ storeys) 62% (100,254 dwellings)



Figure 1: SEQRP Dwelling Typologies & Gentle Density

Of these dwellings, the SEQRP prescribes a dwelling target of 100,254 dwellings that are within the High-Rise Attached dwelling typology, being 9+ storeys, and 16,170 dwellings within the Medium-Rise Attached dwelling typology.

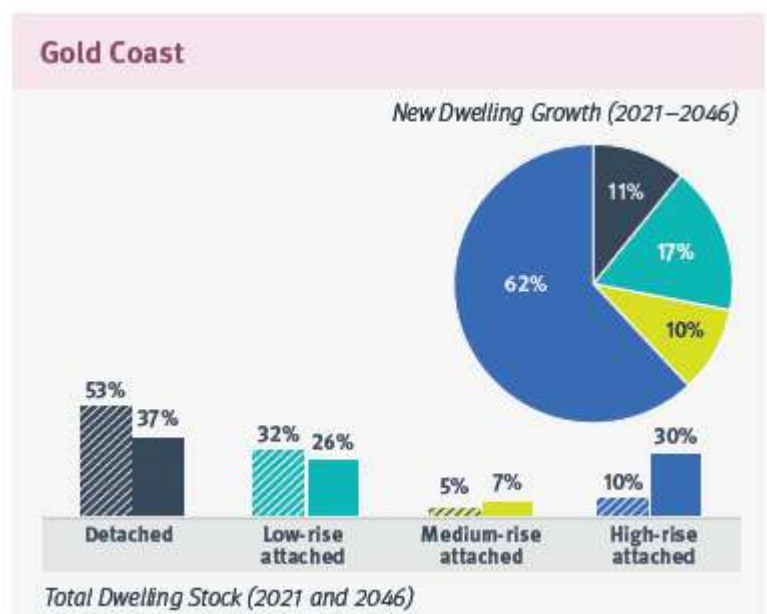


Figure 2: SEQRP Gold Coast New Dwelling Growth Target & Typology Mix



Given that 72% of the projected future dwelling growth on the Gold Coast is required to be accommodated within the Medium-Rise Attached and High-Rise Attached dwelling typologies, a significant proportion of such growth should reasonably be expected to be accommodated along the Light Rail Corridor.

In circa 2021 and culminating in July 2022, Council undertook a Neighborhood Framework planning exercise around four of the eight Stage 3 Light Rail Stations (representing about half of the Stage 3 Light Rail Corridor) which considered how growth could be accommodated in well located area close to the Light Rail Corridor. This considered potential building height increases to accommodate such.

The four light rail stations considered were Nobby Beach Station, Miami North Station, Christine Avenue Station and Second Avenue Station. Two Concept Plans were ultimately published by Council which designated revised building heights within the respective study areas.

The Concept Plans have not been integrated/adopted into the current City Plan and a formal plan making process has not yet commenced.





4 Study Area

This exercise has considered a study area as previously identified by Council as the Stage 3 Light Rail Neighbourhood Framework – Broadbeach to Burleigh Heads Corridor as published by Council in August 2021. Essentially this area captures the walkable catchment of the Stage 3 Light Rail Corridor. The study area is shown with the figure below.



Figure 3: Gold Coast Light Rail Neighbourhood Framework Area (Source: City of Gold Coast)



4.1 Review of Concept Plans

Council has previously prepared Concept Plans for the Nobby Beach and Miami North Station Neighbourhood which comprises an area of 149Ha, and the Christine Avenue and Second Avenue Station Neighbourhood comprising an area of 165Ha.

Within the P&E Committee Agenda for 12 October 2023 (Meeting No. 836) prepared in support of Council's 'Draft Gold Coast Housing Supply Statement' to the SEQRP 2023 consultation period, Council stated that within the four of the eight proposed light rail stations for which the Neighbourhood Framework planning exercise was undertaken, the changes would lead to a theoretical increased dwelling supply of 16,000 dwellings. Within the overall study area of 314Ha, this equates to an average density of approximately 50 additional dwellings per hectare.

Based on the Neighbourhood Framework – Broadbeach to Burleigh Heads document published by Council in August 2021, the Light Rail Stage 3 Corridor is approximately 604Ha (approximately double the size of the two neighbourhoods undertaken by Council). Accordingly, extrapolating out the average density of 50 dwellings per hectare (as based on work to date undertaken by Council) over this area, assuming the same methodology for subsequent neighbourhood planning around the balance of the stations, the Stage 3 Light Rail Corridor may provide for a theoretical dwelling supply of 30,200 additional dwellings.

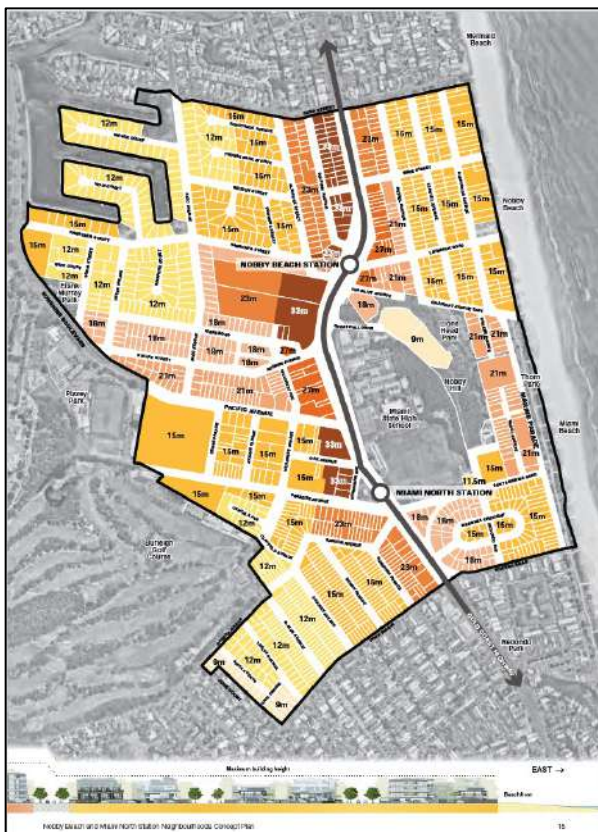


Figure 4: Nobby Beach & Miami North Neighbourhood
(Source: City of Gold Coast)



Figure 5: Christine Avenue & Second Avenue Neighbourhood Area
(Source: City of Gold Coast)



4.2 Consideration to SEQRP Dwelling Supply Target

The theoretical dwelling supply (as extrapolated) represents just 18.6% of the overall dwelling supply target set by the SEQRP for the Gold Coast (ie: 161,700 dwellings divided by 30,200 dwellings = 18.6%).

By comparison, earlier studies undertaken by Council of other key growth areas as part of previous Planning Schemes or Planning Scheme amendments have asserted:

- An additional 20,000 dwellings could be accommodated within the Stage 1 Light Rail Corridor (Griffith University to Broadbeach); and
- An additional 7,100 dwellings with the Southport, Labrador, Biggera Waters Targeted Growth Area as part of the (former) Major Amendments 2 & 3, an area approximately 1,000Ha in area.

It is evident that Council's position in regard to the dwelling supply to be accommodated within the Stage 3 Light Rail Corridor is significant in the context of the City's required new dwelling growth to 2046.

It is noted for completeness that the SEQRP 2023 had not been released at the time of any of these earlier Council studies. Notably, in addition to the dwelling supply metric, the SEQRP introduces proportional targets for specific dwelling typology categories which has not been a consideration in local plan making in the past.

Such is an important consideration in the context of the Stage 3 Light Rail Corridor and the Gold Coast's SEQRP target for the high-rise dwelling typology (towers of 9+ storeys) is projected at 62% (100,274 dwellings). There are only limited opportunities, generally confined to the coastal strip from Labrador in the north to Coolangatta in the south where the City currently accommodates high-rise dwellings. As such, it would be remiss to underutilise land around key corridors in suitable areas for increased density and building height to accommodate high-rise dwelling typologies.

4.3 Balance of Stage 3 Light Rail Neighbourhood

Council has prepared Concept Plans for Stage 3 Light Rail Neighbourhoods comprising approximately half of the light rail corridor. Given the Stage 3 Light Rail Corridor is currently under construction, it is critical that the City's housing response within the corridor is considered corridor wide, and implemented quickly.

As such, as a starting point, Zone Planning QLD have undertaken a 'base case' scenario in which Council's key Neighbourhood Framework Planning principles have been adopted and extrapolated across the balance of the Stage 3 Light Rail Corridor. The purpose of this exercise is to understand the likely building height increase and additional dwelling supply that could have been accommodated within the Stage 3 Light Rail Corridor if the exercise was completed in full.





5 The Base Case

The 'base case' Neighbourhood Framework for the Stage 3 Light Rail Corridor is provided within **Attachment 1**.

The following key assumptions were adopted in extrapolating out the balance of the Neighbourhood Framework planning. No community consultation was undertaken as part of this process.

- The same building height categories adopted within the existing Council Concept Plans were used.
- An intensity of development and increase building height is centralised around light rail stations.
- Building height is generally higher within 1-2 blocks from a light rail station and incrementally reduced between stations.
- The use of the 33m building height designation was generally limited to the western side of the Gold Coast Highway and extending one city block west.
- Except where adjoining the Gold Coast Highway, building height increases east of the Gold Coast Highway were limited.
- Building height designations are bound by road reserves where logical.
- In the Mermaid Beach area, the existing Medium Density Residential Zone land east of, and not immediately fronting the Gold Coast Highway, is limited to 15m.

5.1 Observations of the Base Case

At time of preparation of the respective Neighborhood Concept Plans, the SEQRP 2023 had not been released. As such, the Concept Plans as prepared by Council have not had the opportunity to consider the dwelling typology mix set out within the dwelling growth targets, being Detached Dwellings, Low-Rise Attached (1-3 storeys), Medium-Rise Attached (4-8 storeys) and High-Rise Attached (9+ storeys).

Notably, of the nine building height designations used within the Concept Plans, only the 30m, 33m and 55m building height designation is realistically sufficient to achieve a 9+ storey outcome, aligning with the SEQRP's High-Rise Attached dwelling typology. It is noted however that the 30m building height designation has not been used within either of the Concept Plans prepared to date, whilst the 55m building height designation has only been used within existing the High Density Residential Zone between Miami and Burleigh Heads.

Given the SEQRP's target that 100,254 (62%) new dwellings are required to be provided as high-rise attached dwellings at 9+ storeys, the limited building height to facilitate a greater proportion of this type of dwelling is likely to result in Council not achieving its SEQRP obligations.

5.2 Dwelling Supply Estimate

Within the P&E Committee Agenda for 12 October 2023 (Meeting No. 836) prepared in support of Council's 'Draft Gold Coast Housing Supply Statement' to the SEQRP 2023 consultation period, Council stated that within the four stations for which the Neighbourhood Framework planning exercise was undertaken, the increased density would lead to an additional theoretical dwelling supply of 16,000 dwellings.



To better understand the validity of this figure and to allow a better representation of the overall dwelling supply for the corridor, some rationalisation on the likely development and dwelling yield outcomes has been applied on a macro level.

Informing this rationalisation, Zone Planning QLD, DBI Architects and Rider Levett Bucknell has informed the following key assumptions based on current industry experience.

- Assume a 50% building site cover for residential development is achievable on all sites, noting that most land is zoned as Medium Density Residential, High Density Residential Centre and Mixed Use and is commonly achieved in the current development assessment environment.
- Assume an 80% Net Saleable Area (NSA) efficiency within a Gross Building Area (GBA) being the abovementioned 50% site cover. This assumption considered building efficiency lost to building core, services, corridors and the like.
- For the Low-Rise SEQRP dwelling typology, assumed a residential density of one dwelling per 150m².
- For the Medium-Rise and High-Rise dwelling typologies, assume an average dwelling size of 120m² which is typical of a 2-bedroom apartment. This is considered to be a plausible median point between one and 3-bedroom units.
- Introduction of a concept to consider the likelihood of a site redevelopment within the 25-year SEQRP horizon to 2046 (on a homogeneous corridor wide basis).
- Introduction of a concept to consider existing dwellings and subsequent net increase in consideration of likely number of dwellings needing to be acquired and demolished to redevelop certain types of sites.
- Key areas of industrial zoned land within the Light Rail Corridor have been excluded from dwelling calculations given the current zoning does not allow for or envisage residential development. Council may consider reviewing this issue in the future.
- Given the current zoning intent to accommodate non-residential land uses, for the Mixed Use and Centre Zones, it is assumed:
 - That within building height designations up to and including 23m, that the ground floor comprises non-residential uses and/or car parking; and
 - That within building height designations 27m and above, that the ground floor and first floor comprises non-residential uses and/or car parking.
- The following building height designation translates to the following realistically number of storeys (noting consistency with the same building height designation up to 33m as published within Council's Neighbourhood Framework Documents). Note that the HX (unlimited) building height designation does not occur in the Neighbourhood Planning exercises, however is present in the Stage 3 Light Rail Corridor under the current City Plan mapping:



Table 1: Building Height Designations & Equivalent Storeys

Building Height Designation	No. Storeys
9m	2 storeys
12m	3 storeys
15m	4 storeys
18m	5 storeys
21m	6 storeys
23m	7 storeys
27m	8 storeys
30m	9 storeys
33m	10 storeys
55m	17 storeys
HX (Unlimited Height)	40 storeys

5.2.1 Redevelopment Cycle Considerations

The other key consideration through this planning exercise is the development cycle of properties. It stands to reason that recently developed properties are less likely to be developed within the 25-year SEQRP growth horizon than are older less intensive developments. This would have a further impact on the ability to deliver on the theoretical dwelling supply asserted earlier in this paper. Given time constraints in carrying out this exercise, a rationalisation of recently built developments of a reasonable scale via a large scale dilapidation survey has not been undertaken, rather, a percentage factor of likelihood score has been provided based on the respective building height designation. The 'redevelopment likelihood factor' considers the following:

- Quantity/fragmentation of ownership and difficulty of amalgamation.
 - This speaks to the difficulties of acquiring multiple properties (or units) under currently QLD property law which still requires 100% ownership sale agreement (except in exceptional circumstances), and even following the introduction of a 75% vote threshold change under other property/body corporate legislation.
- Incentive for developers to amalgamate development sites having consideration to the development uplift based on building height designations.
- Existing base value of properties compared to value of developed scenario noting that much of the corridor is within an affluent area with high land value and dwelling prices.
 - This speaks to the feasibility of projects within this area, particular for more affordable product.
- Demographic of the 9m, 12m and 15m residential areas within the corridor noting observations that despite existing planning provisions allowing for development uplift, many people elect to remain within dwelling houses or knock down and rebuild existing houses areas where high amenity exists.

Each of these inputs lead to a likely percentage, or take up rate, for the redevelopment of land.



5.2.2 Net Dwelling Increase

A further important consideration in any planning exercise which seeks to facilitate dwelling growth, is that consideration must be given to existing dwellings and the subsequent net increase of additional dwellings only, is acknowledged. Based on Council’s earlier planning, and all scheme making across QLD for that matter, it is not clear as to how existing dwellings have been considered in dwellings targets. As such, the rationalisation of the ‘base case’ has introduced a concept to consider the net dwelling increase of future development over any given site. This acknowledges that to create new dwellings, typically, existing dwellings must first be demolished.

The above two concepts have been introduced as a multiplying factor within the dwelling supply estimate, combined with the key development parameters earlier noted, to gain a better and more realistic understanding of estimated planned dwelling supply across the corridor.

For example, within the 9m building height designation, which are typically dwelling houses in these suburbs, it is considered that only one in three properties would be redeveloped to a dwelling type beyond a dwelling house (detached dwellings) within the SEQRP’s 25-year period. The net dwelling increase is then considered to be 50%, noting that on balance, the likely outcome would be demolishing an existing dwelling house to construct a duplex (ie: net gain of one additional dwelling).

The Mixed Use and Centre Zones have also been given special consideration on the expectation that the existing land use is solely commercial. As such, residential development within these zones would achieve a net increase of one because no existing residential development is assumed to be demolished.

The following key ‘Redevelopment Likelihood Factors’ and ‘Net Dwelling Increase’ multipliers have been assigned based on the corresponding height. These key factors have been resolved collectively between Zone Planning QLD, DBI Architecture and Rider Levett Bucknell.

Table 2: ‘Base Case’ Key Assumptions

Building Height Designation	Equivalent Residential Storeys	Redevelopment Likelihood Ratio Factor	Net Increase Dwelling Ratio	SEQRP Dwelling Typology
9m	2	0.3	0.5	Low-Rise Attached
12m	3	0.3	0.5	
12m (Mixed Use)	2	0.3	1	
15m	4	0.3	0.8	Medium-Rise Attached
15m (Mixed Use)	3	0.3	1	
18m	5	0.4	0.8	
21m	6	0.4	0.8	
21m (Centre)	5	0.4	1	
23m	7	0.4	0.85	
23m (Mixed Use)	6	0.4	1	
27m	8	0.5	0.85	
27m (Mixed Use)	6	0.5	1	
27m (Centre)	6	0.5	1	



Building Height Designation	Equivalent Residential Storeys	Redevelopment Likelihood Ratio Factor	Net Increase Dwelling Ratio	SEQRP Dwelling Typology
33m	10	0.5	0.9	High-Rise Attached
33m (Mixed Use)	8	0.5	1	
33m (Centre)	8	0.5	1	
55m	17	0.4	0.8	
55m (Centre)	15	0.5	1	
HX	40	0.8	1	

5.3 Key Findings

As shown with the below table, once rationalised based on the likely planning and architectural outcomes, the theoretical additional dwelling supply for the full Stage 3 Light Rail Corridor is approximately **19,956 additional dwellings** at an equivalent average density of 32.5 dwellings/Ha.

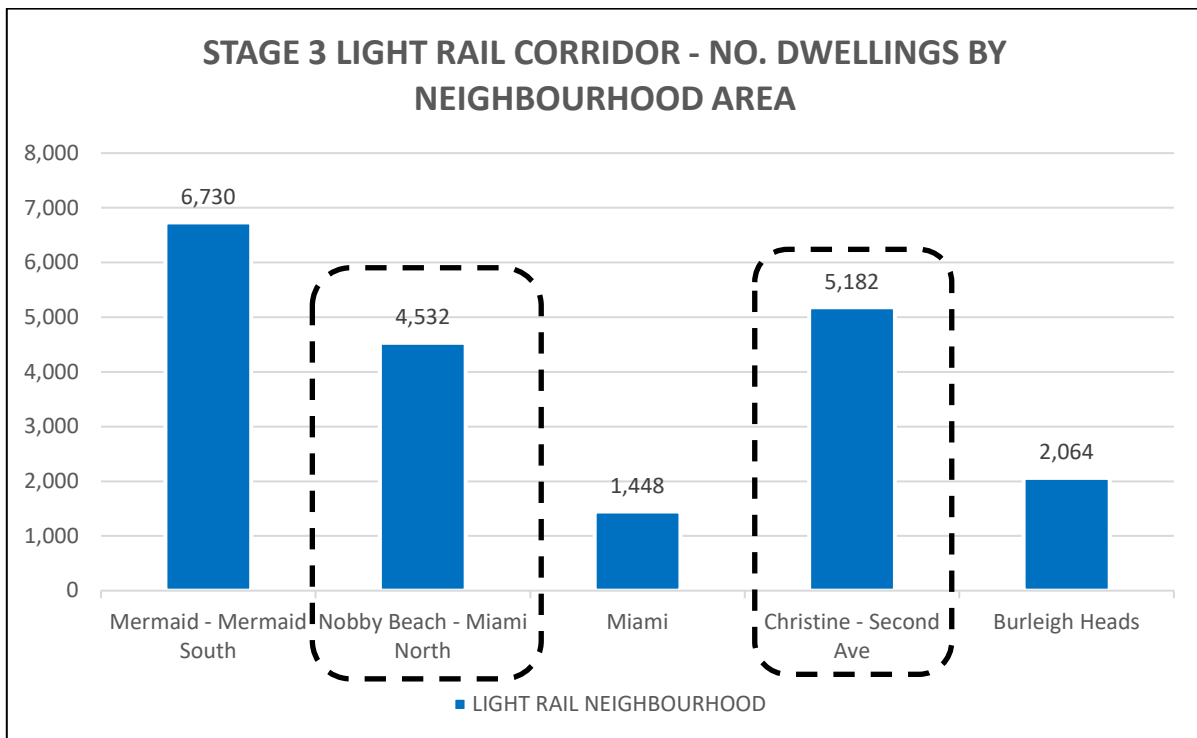


Figure 6: 'Base Case' Additional Dwelling Supply Estimate by Neighbourhood Area

The Stage 3 Light Rail Corridor neatly fits into five Neighbourhood areas because the Nobby Beach and Miami North, and the Christine Avenue and Second Avenue areas (outlined in black dashed line above) have been delineated by Council, and the area between as well as areas to the north and south logically creates five Neighbourhood areas.

Subsequently, in the context of the broad 30,200 estimated dwellings extrapolated across the Stage 3 Light Rail Corridor, after applying the abovementioned assumptions and based on the building height designations which align with the SEQRP dwelling typologies, the Stage 3 Light Rail Corridor 'base case' would provide for the following dwelling typology mix:

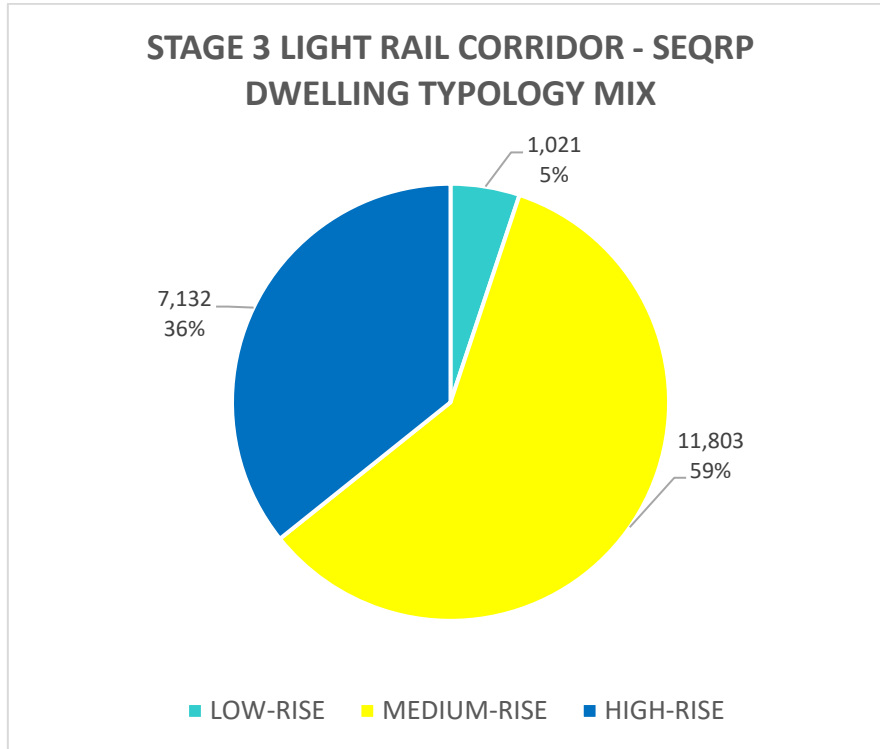


Figure 7: 'Base Case' New Dwelling Growth Mix by SEQRP Dwelling Typology

The following chart provides a comparison of the 'base case' dwelling supply by dwelling type against the corresponding SEQRP dwelling type targets City-wide:

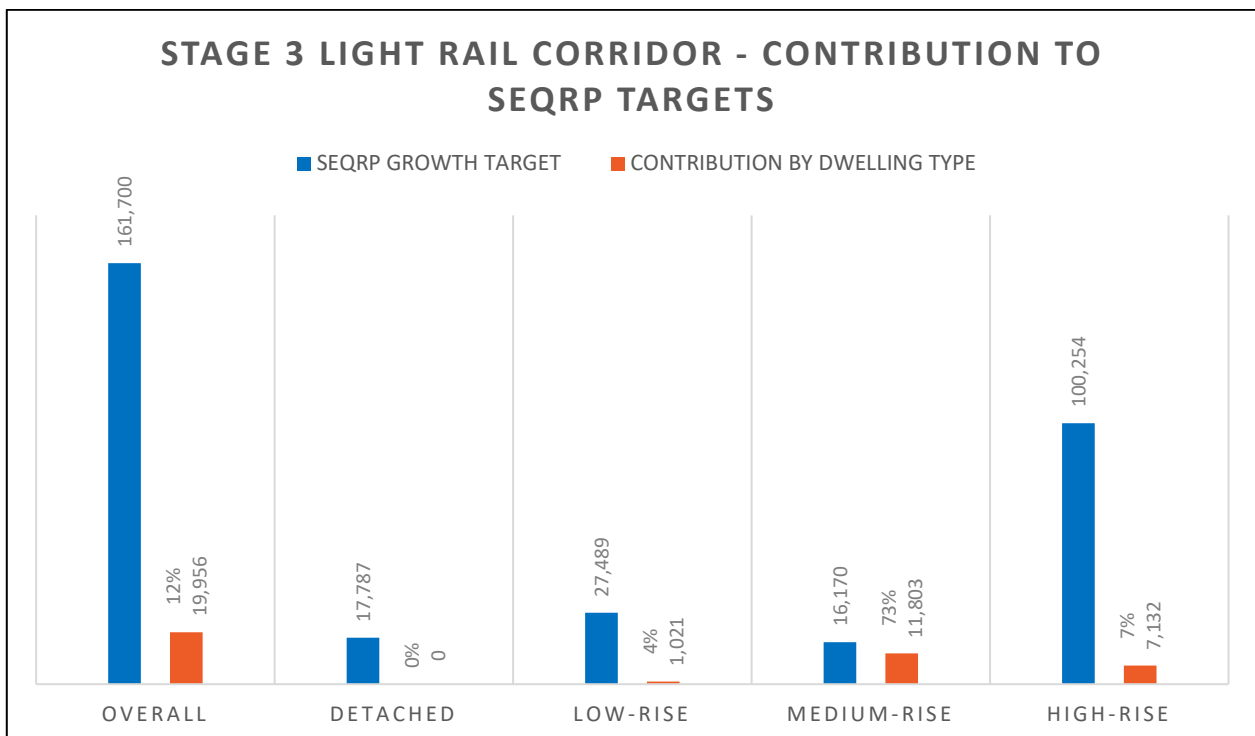


Figure 8: 'Base Case' New Dwelling Growth Mix Comparison to SEQRP Growth Targets



It is evident through the above representation of the 'base case' data that:

1. The 'base case' will not plan for a sufficient number of additional dwellings to make a material and proportionate contribution to the SEQRP dwelling growth targets; and
2. The 'base case' building height categories used, will not produce a suitably proportionate mix of Low-Rise, Medium-Rise, and in particular, High-Rise dwelling typologies to achieve the SEQRP dwelling typology mix.



6 Where to from Here

Planning for a dwelling growth of 161,700 new dwellings by the year 2046 is a significant challenge for the City of Gold Coast. In aiming to achieve this target, it is not unreasonable to assume that the majority of increased residential density should be focused around key centres and high frequency public transport corridors. An increase in density has been assumed within the business case prepared by Infrastructure Australia for the Stage 3 Light Rail project.

The rationalised dwelling supply that the 'base case' scenario would only contribute to 12% of the 161,700 new dwelling target to 2046 under the SEQRP and just 7% of the 100,254 new dwelling target for the High-Rise Attached dwelling typology.

Accordingly, a further exercise has been undertaken to provide an 'alternative case' Light Rail Neighbourhood Framework for the whole Stage 3 Light Rail Corridor which seeks to achieve the extrapolated dwelling supply of 30,200 additional dwellings (based on Council's initial 16,000 dwelling purported across two Neighbourhood Framework areas), ultimately through a TLPI as recommended by this paper. Such has been informed by industry input aimed at providing a reasonable, accurate and deliverable outcome.

An additional dwelling supply of 30,200 within the Stage 3 Light Rail Corridor would contribute 18.6% of the Gold Coast's overall dwelling growth target as set by the SEQRP. Such is considered a reasonable contribution to this target for the Stage 3 Light Rail Corridor.



7 The Alternative Case

The 'alternative case' Neighbourhood Framework for the Stage 3 Light Rail Corridor is provided within **Attachment 2**.

It is considered that the Stage 3 Light Rail Corridor should reasonably be able to accommodate 18.6% (30,200 dwellings) of the Gold Coast's SEQRP dwelling targets to 2046.

Subsequently, the following key assumptions have informed the development of the alternative case scenario as a collaboration between Zone Planning QLD, DBI Architects and Rider Levett Bucknell:

- No reduction of existing building heights afforded under current City Plan.
- Based on work done to date by Council on the Neighbourhood Framework, building heights were intended to be the upper limit of building height (ie: no ability to seek additional 50% building height uplift).
- Existing development rights should not be prejudiced (ie: ability to seek 50% uplift under current provisions) or 50% is effectively built into LR Corridor Building heights (based on existing height).
- Focus on further uplift and intensification around the 'spine' of the light rail and proximity to light rail stations, generally being two blocks west of the Gold Coast Highway and one block east. Such has sought to include Council's earlier consultation feedback and different intensity of development between the east and west sides of the Gold Coast Highway.
- Focus on achieving a suitable proportion of prescribed SEQRP dwelling typologies, noting that there are limited areas in the City suitable for High-Rise dwellings.
- Further, whilst not supported through earlier City Plan proposed amendments, the Low-Medium Density Residential Zone (LMDR) was intended to apply to all 12m building height designations. The 9m and 12m areas within Light Rail corridor are considered commensurate of the LMDR Zone and therefore have retained their 9m and 12m building height designation to assist in the contribution to the Low-Rise Attached dwelling typology.
- Identification of 'Key Sites' and ability to qualify for such by meeting a specific set of business rules and are capable of accommodating higher yield and building height without undermining the City Plan outcomes or surrounding amenity.
- Bias in favour of Code Assessable outcomes recognizing the fact that the objective is to deliver a large quantity of housing supply quickly.
- Consideration of commercial feasibility.

7.1 Key Site Criteria

A number of Key Sites along the Light Rail Corridor have been identified as example of sites considered capable of accommodating higher dwelling yield and building height without undermining the City Plan outcomes or surrounding amenity. That is, such sites are large enough to accommodate a design, which is taller in height whilst remaining sensitive to its surrounding interface.

It is intended that these Key Sites will assist in making a more significant contribution to the SEQRP dwelling targets than other land within the corridor.



The intent is that such sites overcome an existing key hurdle to redevelopment, site amalgamation/acquisition at a scale large enough to produce a commercially feasible outcome.

Key sites have been identified based on the following key business rules:

- Minimum area of 2,000m²;
- Minimum mapped building height designation of 30m (based on the 'alternative case');
- Gold Coast Highway/Light Rail frontage;
- Limited ownership (generally no more than two owners/holdings), or amalgamated as such by a developer (based on cadastre);
- Regular site shape which is relatively easy to develop;
- Low value existing development;
- Corner location where possible; and
- Proximity to Stage Light Rail Station.

7.2 Consideration to 50% Uplift

A review of the current City Plan Building Height Overlay Mapping within the Light Rail Corridor has been undertaken against the proposed Neighbourhood Framework building height designation presented in the Base Case (refer **Attachment 1**).

This review has been undertaken to understand if the proposed Neighbourhood Framework building height would result in an outcome which is less than currently may be afforded to an Applicant for a 50% building height uplift under the Strategic Framework via the Impact Assessable pathway. It is our view that it is important for this exercise should not prejudice any existing development rights which currently afforded under current City Plan provisions. This exercise towards implementation of a TLPI however must deliver an efficiency of process (such as all applications being made Code Assessable) in order to deliver dwelling supply in the most efficient manner.

The review has identified two key areas where the 'base case' Neighbourhood Framework Building heights would result in a lesser building height than the equivalent 50% building height uplift as follows:

- Mixed Use zoned land generally along the east and west side of Gold Coast Highway in Mermaid Beach / Broadbeach (from Peerless Avenue, south to William Street/Sportsman, Avenue).
 - The current mapped building height designation is 24m.
 - 50% uplift of this results in a building height of 36m.
 - The Base Case building height has designated this area as 27m or 33m.
- High Density Residential Zone in Burleigh Heads, east of Gold Coast Highway (from Kratzmann Avenue to corner of The Esplanade and Gold Coast Highway)
 - The current mapped building height designation is 53m.
 - 50% uplift of this results in a building height of 79.5m
 - The Base Case building height has designated this area as 53m.



7.3 Resolution of Alternative Case

The following discusses and resolves how key considerations and outcomes have been arrived at for the Alternative Case proposed through **Attachment 2**.

7.3.1 Growth Target Dwelling Supply

The Alternative Case targets the provision to provide an additional dwelling supply of 30,200 dwellings being 18.6% of the City’s additional dwelling supply obligations to 2046.

7.3.2 Base Case Rationalised Dwelling Supply

The rationalisation of the base case scenario identified an additional dwelling supply of 19,956 dwellings, a shortfall of 10,244 dwellings against the target figure.

7.3.3 How can Additional Dwelling Yield be Achieved

The earlier Neighbourhood Framework planning exercises undertaken by Council exclusively looked at increasing building height designations within the study area. Further, the SEQRP dwelling typologies introduced in the 2023 review, are solely predicated on building height. As such, to achieve the target dwelling growth supply set out in this paper, increase in building height within the study area is considered to be the only mechanism to achieve additional dwelling supply. Other outcomes such as expanding site coverage beyond 50% are not considered to be plausible nor do they produce significantly higher yields.

7.3.4 Consideration to SEQRP Dwelling Typologies & Proportional Requirements

Acknowledging the base case observation that only two building height categories achieve the High-Rise dwelling typology (33m and 55m) required by the SEQRP and the resulting disproportionate delivery of dwelling mix, building height increases have sought to balance the planned capacity of SEQRP dwelling typologies, with a focus on increasing the High-rise dwelling capacity given that 62% of new dwelling across the City must be delivered within this typology under the SEQRP. Consequently, to achieve additional dwelling supply capacity and an improved proportion of dwelling mix in order to achieve the SEQRP obligations, the following changes to building height categories have been adopted from the ‘base case’ to the alternative case’:

Table 3: ‘Alternative Case’ revised Building Height Designations & Key Assumptions

Building Height Designation	Recalibrated Building Height Designation	Equivalent Residential Storeys	Redevelopment Likelihood Ratio Factor	Net Increase Dwelling Ratio	SEQRP Typology
9m	9m	2	0.3	0.5	Low-Rise Attached
12m	12m	3	0.3	0.5	
12m (Mixed Use)	55m (mixed use)	15	0.3	1	
15m	15m	4	0.3	0.8	Medium-Rise Attached
15m (Mixed Use)	15m (Mixed Use)	3	0.3	1	



<i>Building Height Designation</i>	<i>Recalibrated Building Height Designation</i>	<i>Equivalent Residential Storeys</i>	<i>Redevelopment Likelihood Ratio Factor</i>	<i>Net Increase Dwelling Ratio</i>	<i>SEQRP Typology</i>
9m	9m	2	0.3	0.5	Low-Rise Attached
12m	12m	3	0.3	0.5	
12m (Mixed Use)	55m (mixed use)	15	0.3	1	
18m	18m	5	0.4	0.8	
21m	21m	6	0.4	0.8	
21m (Centre)	21m (Centre)	5	0.4	1	
23m	30m	10	0.4	0.85	High-Rise Attached
23m (Mixed Use)	30m (Mixed Use)	8	0.4	1	
27m	48m	15	0.5	0.85	
27m (Mixed Use)	48m (Mixed Use)	13	0.5	1	
27m (Centre)	48m (Centre)	13	0.5	1	
33m	54m	17	0.5	0.9	
33m (Mixed Use)	54m (Mixed Use)	15	0.5	1	
33m (Centre)	54m (Centre)	15	0.5	1	
33m	55m	17	0.4	0.8	
55m	79.5m	25	0.4	0.85	
55m (Centre)	79.5m (Centre)	23	0.5	1	
HX	HX	40	0.8	1	

7.3.5 Focus on the “Spine” of the Corridor & around Stations

Noting the above and the need to increase building to achieve a material dwelling supply increase, building heights increases are focused around the ‘spine’ of the Light Rail Corridor and around Light Rail Stations. This limited to the 23m building height designation and above used in the ‘base case’. Such also acknowledges limited building height increase east of the Gold Coast Highway.

7.3.6 Treatment of Key Sites

Key sites have the potential to generate a significant amount of dwelling supply assisting to make up the shortfall between the base case and alternative case. Whilst a number of key sites have been identified as part of this exercise in order to demonstrate the outcome that can be achieved, to remain objective and equitable, it is suggested that any land could be considered as a key site, subject to meeting certain qualifying criteria used to identify such sites in the first place.

It is subsequently recommended that the building height of qualifying key sites, may be afforded an increased building height uplift of 50% above the ‘alternative case’ mapped building height designation. This building height increase has, in part, been derived as the proportional building height increase required to achieve a





commercially feasible outcome based on the test case discussed earlier in this report, but also considers existing assessment benchmarks provisions within the current City Plan.

It is anticipated that the TLPI could address such through key provisions of its purpose and level of assessment trigger.

7.3.7 Consideration to 50% uplift of Existing City Plan Building Height Overlay Designation

As earlier discussed, there are two key areas where the base case would prejudice existing development rights afforded under the current City Plan.

For the land currently within the Mixed Use Zone, 24m building height area in the north part of the corridor, under current City Plan provisions, a 36m building height outcome (representing a 50% height uplift) may be achieved via an Impact Assessable pathway. Therefore, to only designate a building height under the 'base case' of this land as 27m or 33m would be a reduction in what may already be achieved under the existing framework, prejudicing existing development rights. However, in this instance, it is noted that to achieve the equivalent 50% building height uplift, an increase to 36m is only required. Such is not considered significant when compared to the 'base case' designation of 27m or 33m and likely to palatable to the community interest.

For the High Density Residential Zone, 53m building height area at Miami/Burleigh Heads, given the substantial building height increase that would be required from 53m to 79.5m. It is noted that there are several development approvals or buildings currently under construction within this area, which have been supported for the 50% height uplift and several 30+ storey towers already exist in this corridor. The redevelopment likelihood in this area is also considered fairly low given the recent development cycle. As such, so as not to prejudice existing development rights (as of right or via the Impact Assessable pathway), it is proposed that the Alternative Case building height designation be amended to reflect the 50% building height uplift based on the current City Plan provisions.

Further, acknowledging the purpose of the TLPI to deliver new dwellings quickly, it is also proposed that the building height uplift be afforded via the Code Assessable application pathway.

7.3.8 Level of Assessment

In the interest of delivering a significant number of dwellings within the 25-year SEQRP horizon, it is recommended that all assessable development where remaining with the building height designation mapped by the alternative case (or where within the proportional increased building height for qualifying key sites), be made Code Assessable.

Such will derisk projects, speed up process and increase investment attraction to improve take up rate improving the likelihood of achieving the dwelling growth target.



7.4 Key Findings & Comparison to 'Base Case'

As shown with the below table, by applying the aforementioned mechanisms, largely increasing building heights along the 'spine' of the light rail corridor, there is the potential to achieve an expanded dwelling supply for the Stage 3 Light Rail Corridor of approximately 28,548 dwellings (inclusive of key site considerations) at an equivalent average density of 46.5 dwellings/Ha. Most notably, even with the substantial increase in development intensity proposed by the 'alternative case', there is still a shortfall of 1,652 dwellings against the target of 30,200 dwellings.

The following provides a graphical representation of the 'alternative case' dwelling supply by Neighbourhood Area.

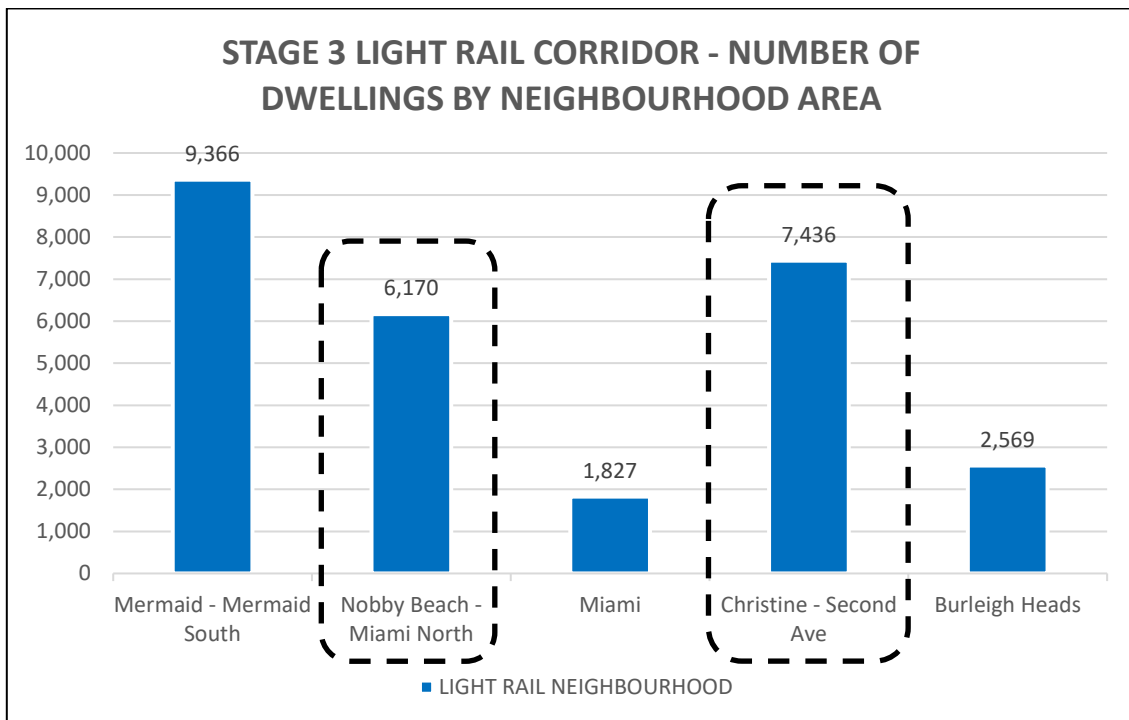


Figure 9: 'Alternative Case' Additional Dwelling Supply Estimate by Neighbourhood Area

The following graphs provide a comparison of the change proportion of dwelling typologies that can be provided through the 'alternative case' against the 'base case' outcomes.

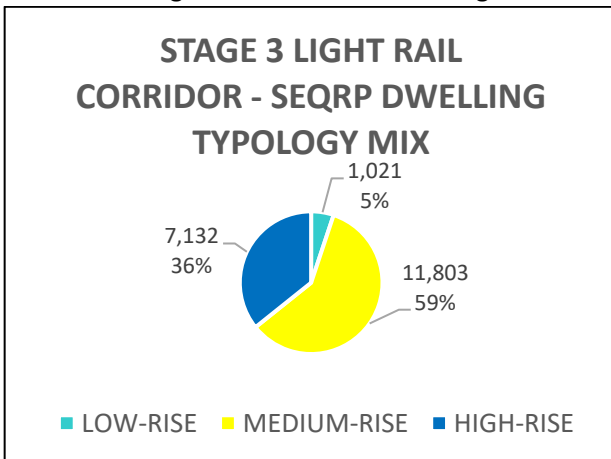


Figure 10: 'Base Case' New Dwelling Growth Mix by SEQRP Dwelling Typology

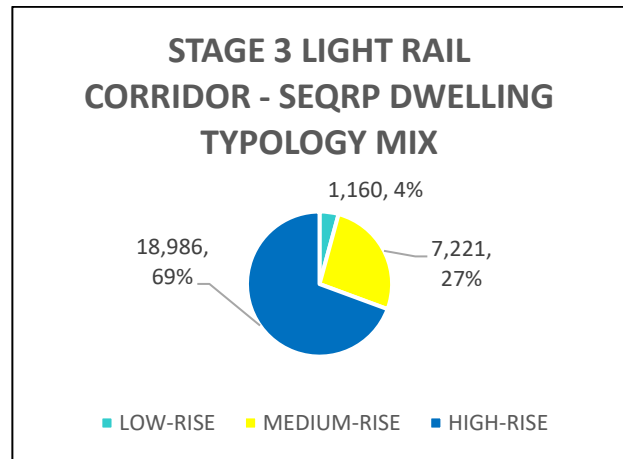


Figure 11: 'Alternative Case' New Dwelling Growth Mix by SEQRP Dwelling Typology



The following chart provides a comparison of the 'base case' dwelling supply by dwelling type against the corresponding SEQRP dwelling type targets City-wide:

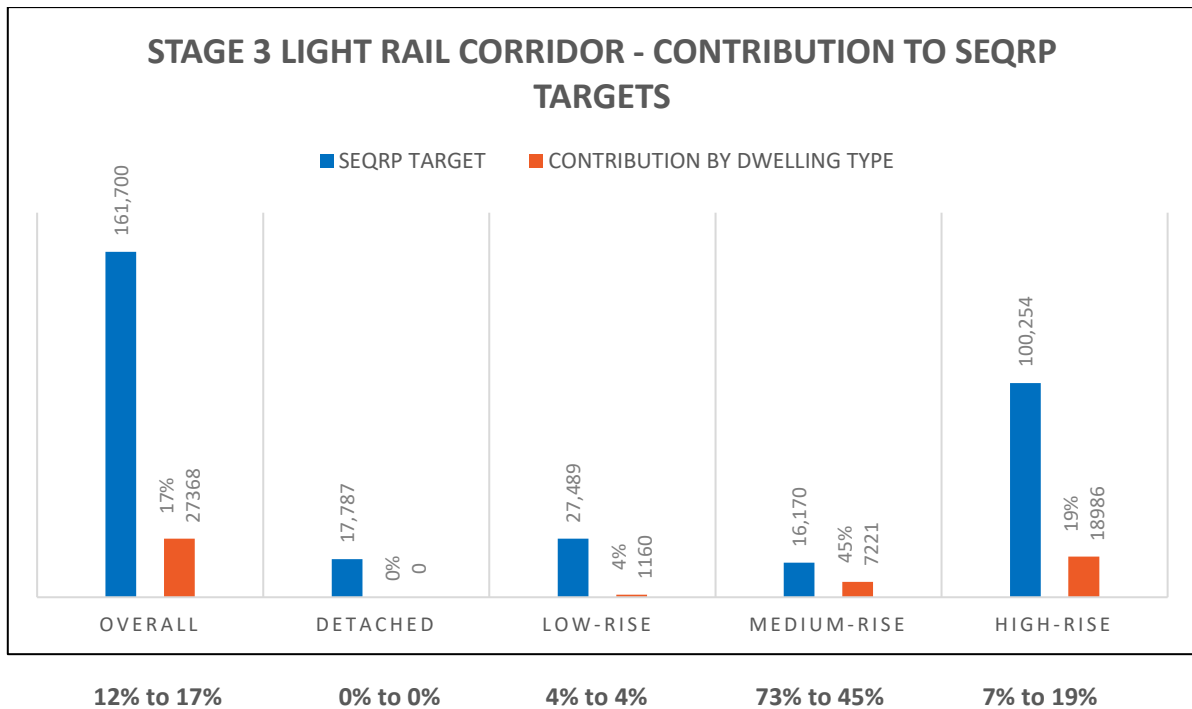


Figure 12: 'Alternative Case' New Dwelling Growth Mix Comparison to SEQRP Growth Targets

It is evident through the above representation of the 'alternative case' data that:

1. The 'alternative case' outcome still does not achieve the target of 30,200 dwellings emphasising the task at hand and need to intensify development within this area if SEQRP targets are to be met;
2. Increasing building height, particularly the 'base case' equivalent designations of 23m and can significantly improve the contribution of High-Rise dwelling typologies (9+ storeys) to provide a material contribution to the SEQRP target commensurate with expectation for a high frequency public transport corridor;
3. The target of 30,200 dwellings could reasonably be achieved by focussing on the 'spine' having regard to community expectations within the more suburban areas of Mermaid Beach and Burleigh Waters;
4. The concept of 'key sites' incentivises the private sector to amalgamate sites with characteristics that lead to more intense and taller development whilst assist in the dwelling supply contribution; and
5. Building height uplift incentivises the private sector, thus improving the redevelopment likelihood of converting planned supply into actually supply.



8 Recommendation

In acknowledging that a new Gold Coast Planning Scheme is not anticipated to be implemented, at earliest, until 2027, and the ongoing and increasing dwelling supply/affordability crisis, it is recommended that the Planning Minister (with Council support) urgently progress and implement a Temporary Local Planning Instrument responding to State Interest: Housing Supply and Diversity.

It is recommended that the Ministerial TLPI:

- Apply over the Stage 3 Light Rail Neighbourhood Framework – Broadbeach to Burleigh Heads Corridor as published by Council in August 2021.
- Be implemented without the need for further community consultation given the criticality of the issue at hand.
- Set a Dwelling Growth Target of 30,200 additional dwellings by 2046 (noting a TLPI only remains in effect for two years) for the Stage 3 Light Rail Neighbourhood Framework area.
- Adopt the Alternative Case Building Height Map (**Attachment 2**), increasing building height designations along the corridor to accommodate increased designation and to achieve a suitable mix of dwelling typologies required by the SEQRP.
- Mapped building heights are the envisaged maximum building height.
- Introduce qualifying criteria for Key Sites to benefit from an increased building height uplift relative to the mapped building height and remain as Code Assessable.
- Ensure that revised mapped building heights do not prejudice existing development rights/opportunity to seek the 50% building uplift as allowed under the City Plan 2016 (v11).
- Ensure that all development applications within the revised mapped building height designation and are afforded proportional building height uplift for qualifying key sites, remain Code Assessable.

8.2 City Plan Considerations for TLPI

It is suggested that that the Ministerial TLPI consider the following within the current Gold Coast City Plan:

- The purpose of the TLPI should be predicated around the State Interest – Housing Supply and Diversity and define a Dwelling Growth Target of 30,200 additional dwellings within the Stage 3 Light Rail Corridor being 17% of the SEQRP total to 2046.
- Introduce a new Table of Assessment specific for the Stage 3 Light Rail Neighbourhood Framework Area ensuring all development within the mapped building height (or proportional increase afforded to key sites) remains Code Assessable.
- Include a set of Overall Outcomes, setting out how the purpose of the TLPI is to be achieved. Focus should be on encouraging dwelling supply and diversity.
- Introduce qualifying eligibility criteria for 'key sites' and subsequently building height uplift based on the criteria set out in this document.
- Consideration to reduced car parking rates, possibly aligning with those rates used within the Southport PDA for proximity to Light Rail Stations (being 0.75 spaces per unit and one space per 10 units for visitors).



ATTACHMENTS

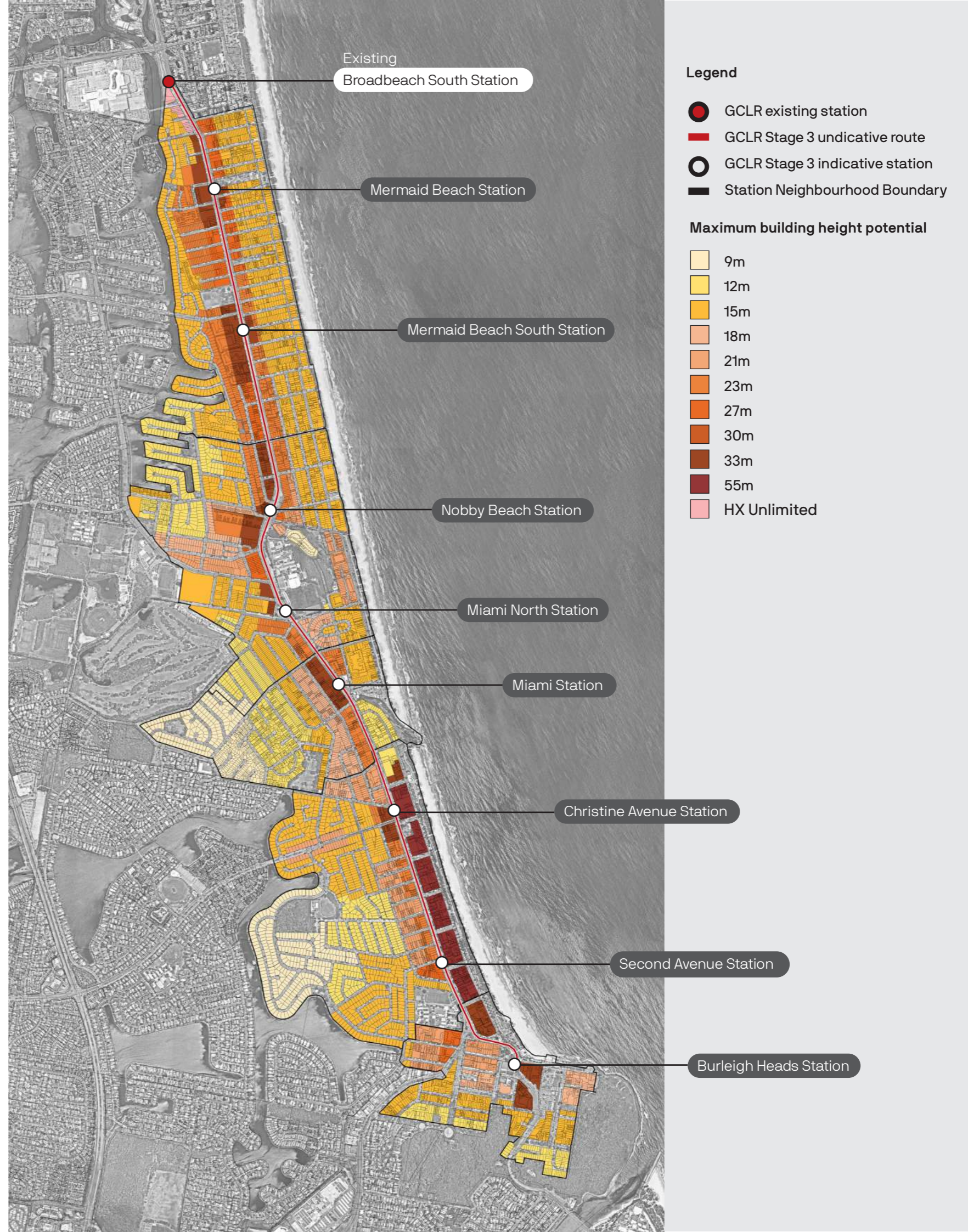


ATTACHMENT 1

STAGE 3 LIGHT RAIL NEIGHBOURHOOD FRAMEWORK
BASE CASE



Stage 3 Gold Coast Light Rail





Stage 3 Light Rail

Mermaid Beach Station

Legend

- GCLR existing station
- GCLR Stage 3 indicative route
- GCLR Stage 3 indicative station
- Station Neighbourhood Boundary

Maximum building height potential

- 9m
- 12m
- 15m
- 18m
- 21m
- 23m
- 27m
- 30m
- 33m
- 55m
- HX Unlimited





Stage 3 Light Rail

Mermaid Beach South Station

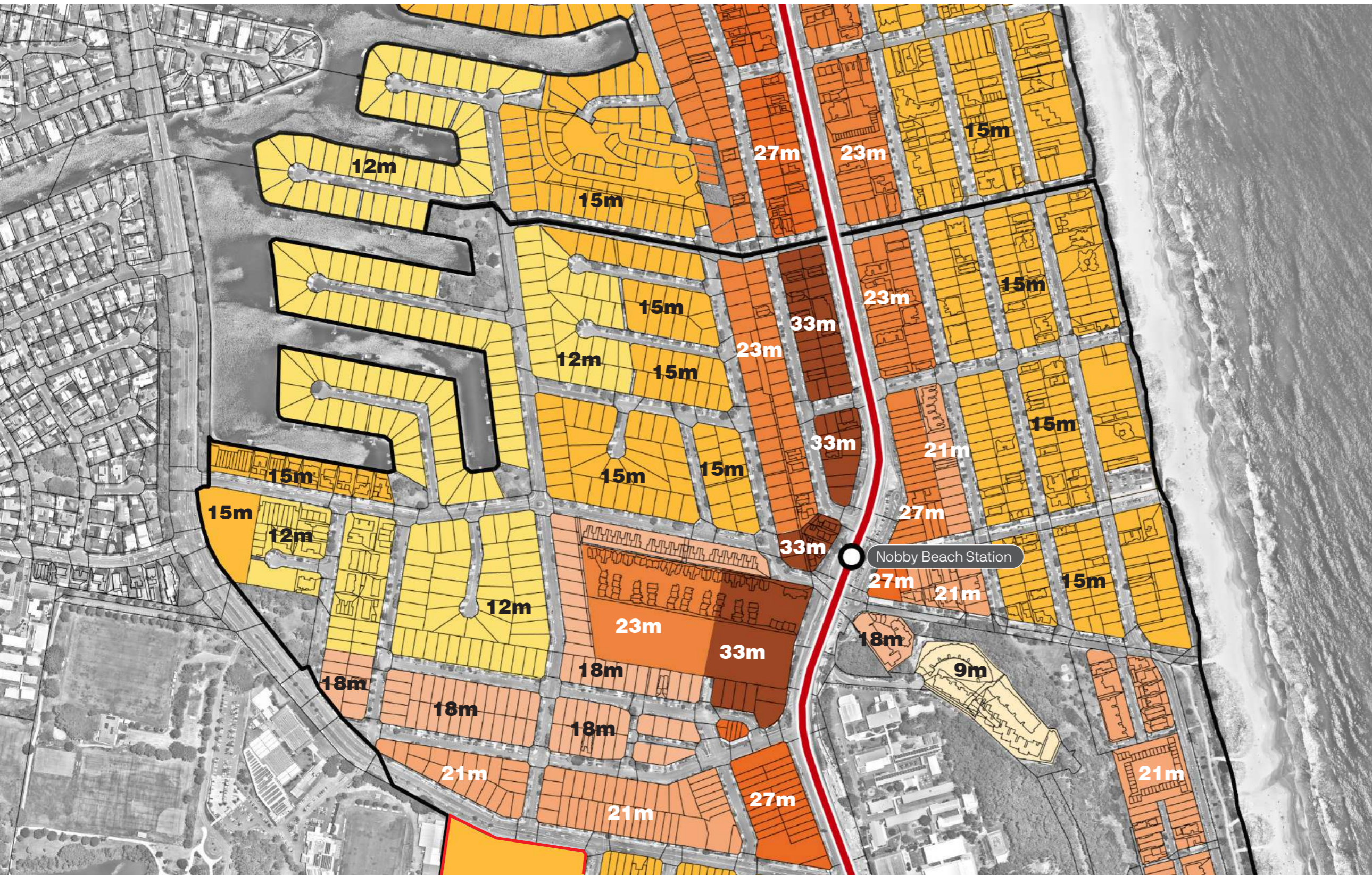
Legend

- GCLR Stage 3 indicative route
- GCLR Stage 3 indicative station
- Station Neighbourhood Boundary

Maximum building height potential

- 9m
- 12m
- 15m
- 18m
- 21m
- 23m
- 27m
- 30m
- 33m
- 55m





Stage 3 Light Rail
Nobby Beach Station

Legend

- GCLR Stage 3 indicative route
- GCLR Stage 3 indicative station
- Station Neighbourhood Boundary

Maximum building height potential

- 9m
- 12m
- 15m
- 18m
- 21m
- 23m
- 27m
- 30m
- 33m
- 55m





Stage 3 Light Rail

Miami North Station

Miami Station

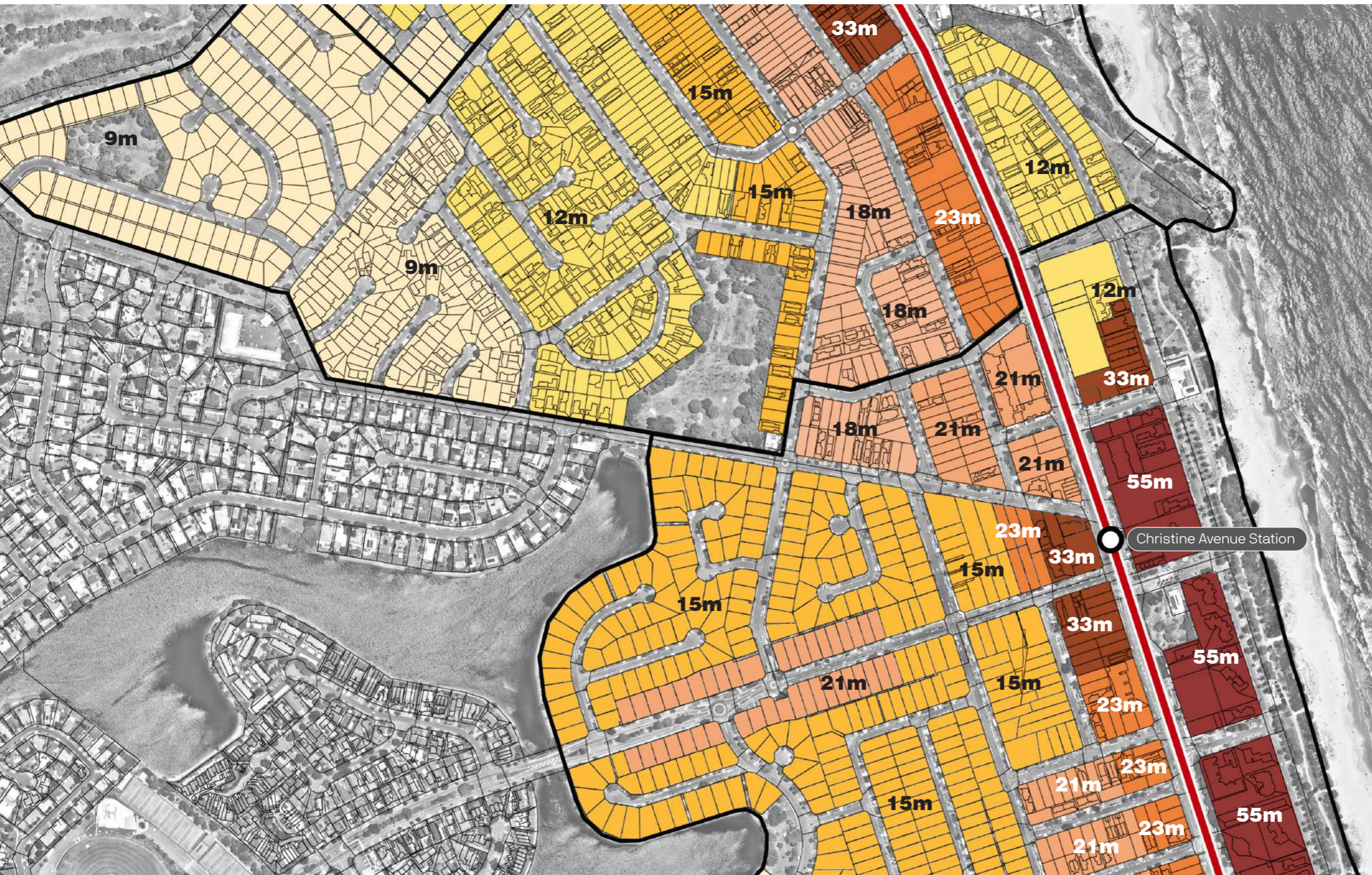
Legend

- GCLR Stage 3 indicative route
- GCLR Stage 3 indicative station
- Station Neighbourhood Boundary

Maximum building height potential

- 9m
- 12m
- 15m
- 18m
- 21m
- 23m
- 27m
- 30m
- 33m
- 55m





Stage 3 Light Rail

Christine Avenue Station

Legend

- GCLR Stage 3 indicative route
- GCLR Stage 3 indicative station
- Station Neighbourhood Boundary

Maximum building height potential

- 9m
- 12m
- 15m
- 18m
- 21m
- 23m
- 27m
- 30m
- 33m
- 55m





Stage 3 Light Rail

Second Avenue Station

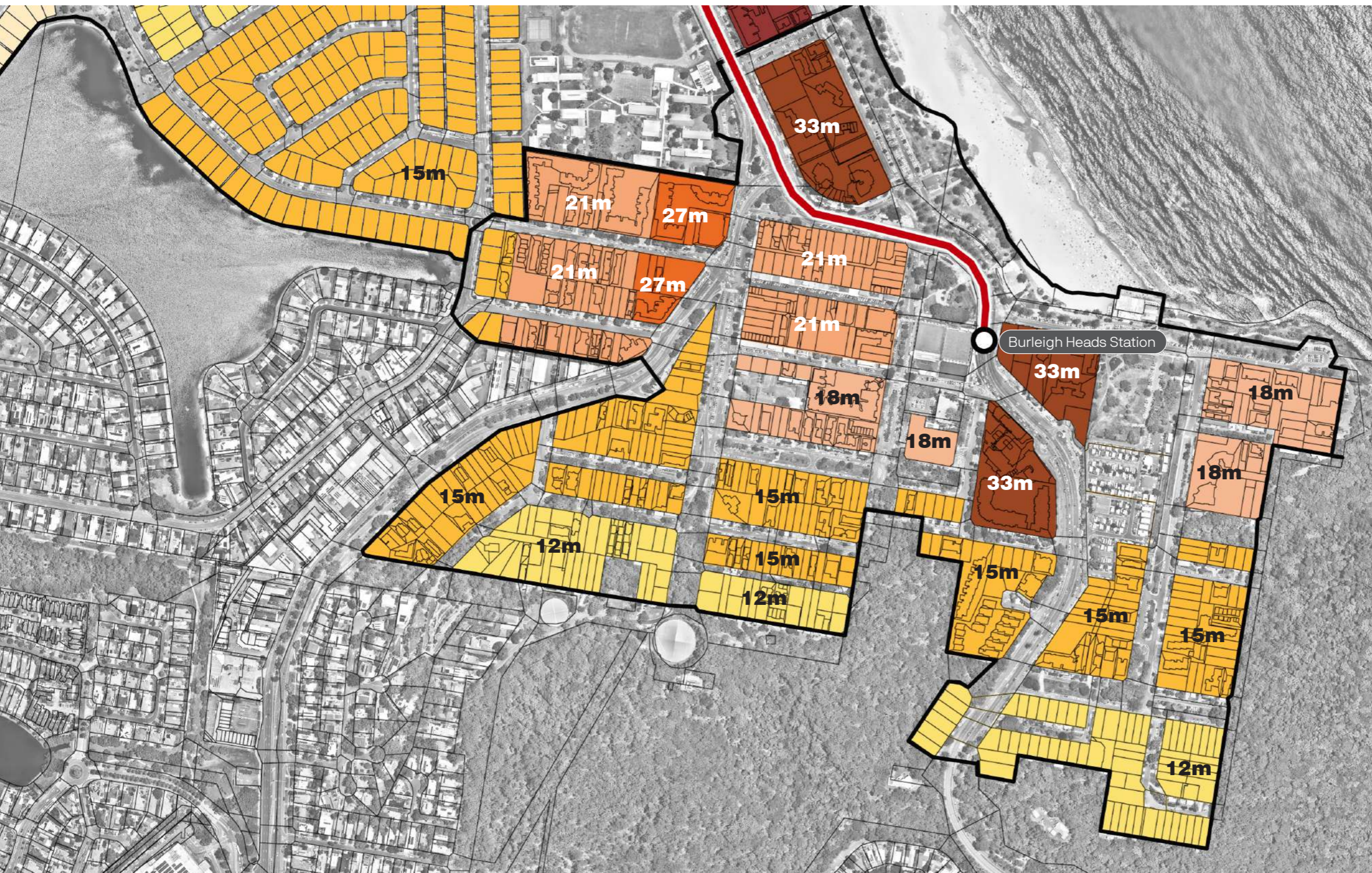
Legend

- GCLR Stage 3 indicative route
- GCLR Stage 3 indicative station
- Station Neighbourhood Boundary

Maximum building height potential

- 9m
- 12m
- 15m
- 18m
- 21m
- 23m
- 27m
- 30m
- 33m
- 55m





Stage 3 Light Rail
Burleigh Heads Station

Legend

- GCLR Stage 3 indicative route
- GCLR Stage 3 indicative station
- Station Neighbourhood Boundary

Maximum building height potential

- 9m
- 12m
- 15m
- 18m
- 21m
- 23m
- 27m
- 30m
- 33m
- 55m



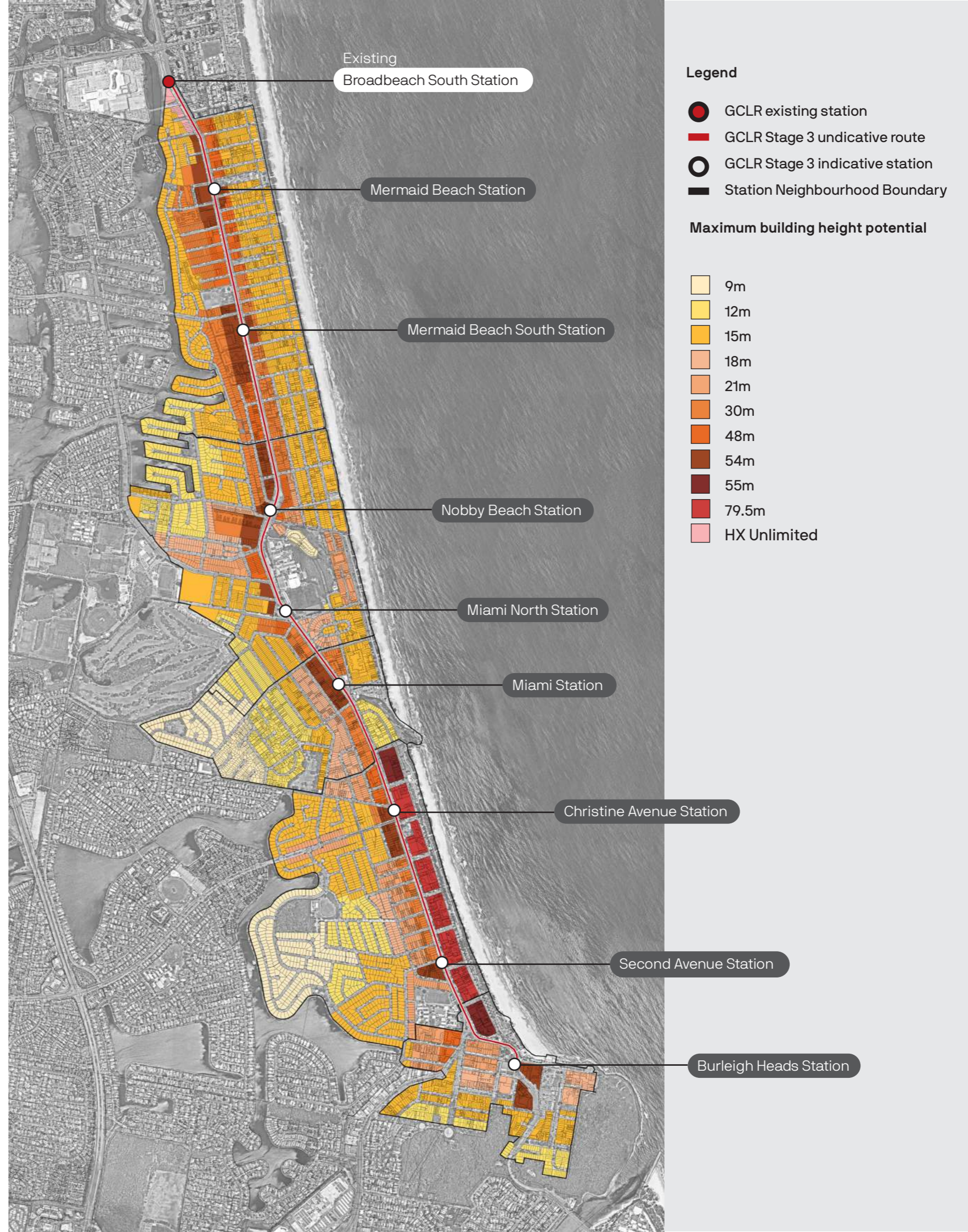


ATTACHMENT 2

STAGE 3 LIGHT RAIL NEIGHBOURHOOD FRAMEWORK
ALTERNATIVE CASE



Stage 3 Gold Coast Light Rail





Stage 3 Light Rail

Mermaid Beach Station

Legend

- GCLR existing station
- GCLR Stage 3 indicative route
- GCLR Stage 3 indicative station
- Station Neighbourhood Boundary

Maximum building height potential

- 9m
- 12m
- 15m
- 18m
- 21m
- 30m
- 48m
- 54m
- 55m
- 79.5m
- Key Sites
- HX Unlimited





Stage 3 Light Rail

Mermaid Beach South Station

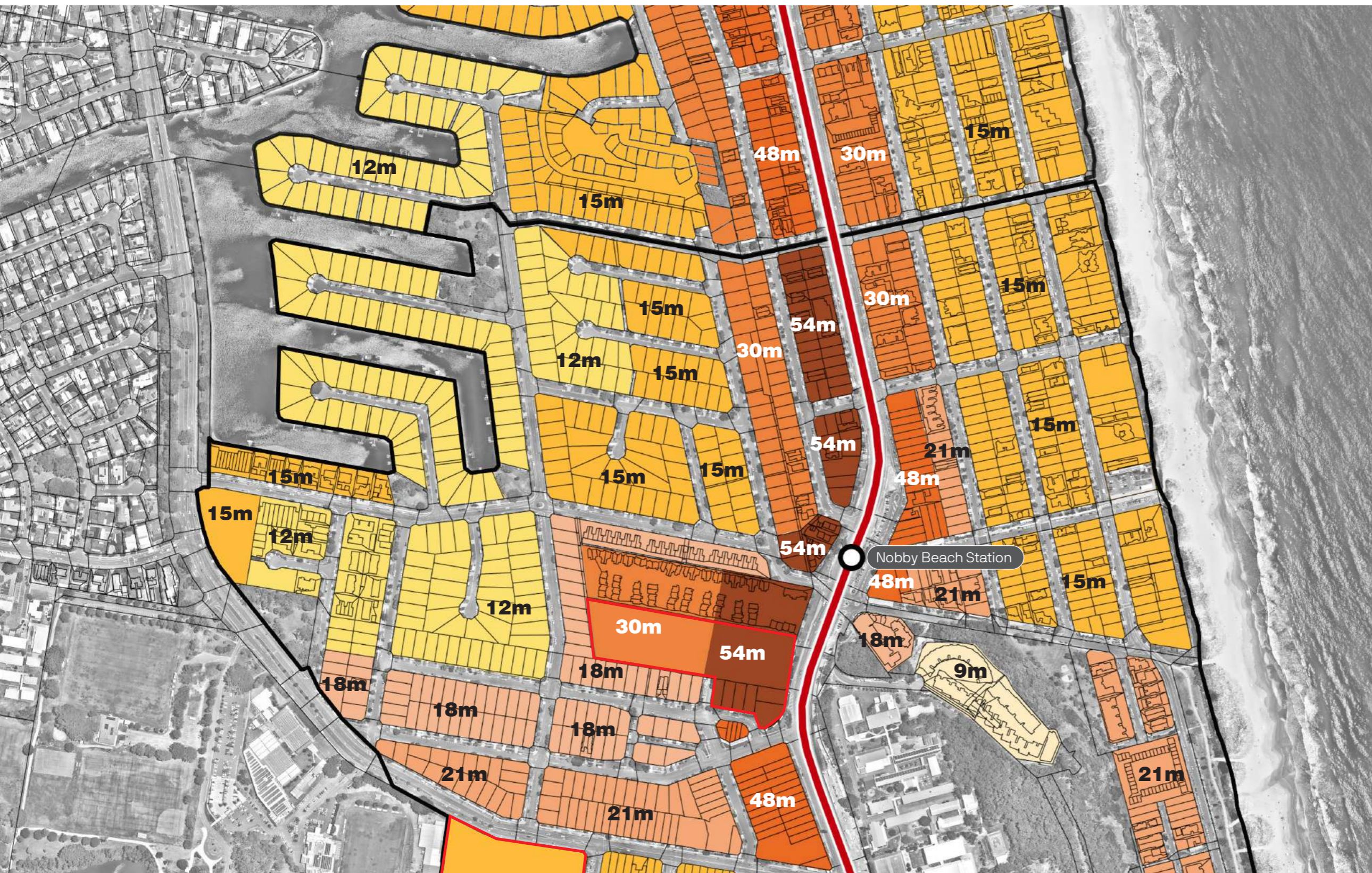
Legend

- GCLR Stage 3 indicative route
- GCLR Stage 3 indicative station
- Station Neighbourhood Boundary

Maximum building height potential

- 9m
- 12m
- 15m
- 18m
- 21m
- 30m
- 48m
- 54m
- 55m
- 79.5m
- Key Sites





Stage 3 Light Rail
Nobby Beach Station

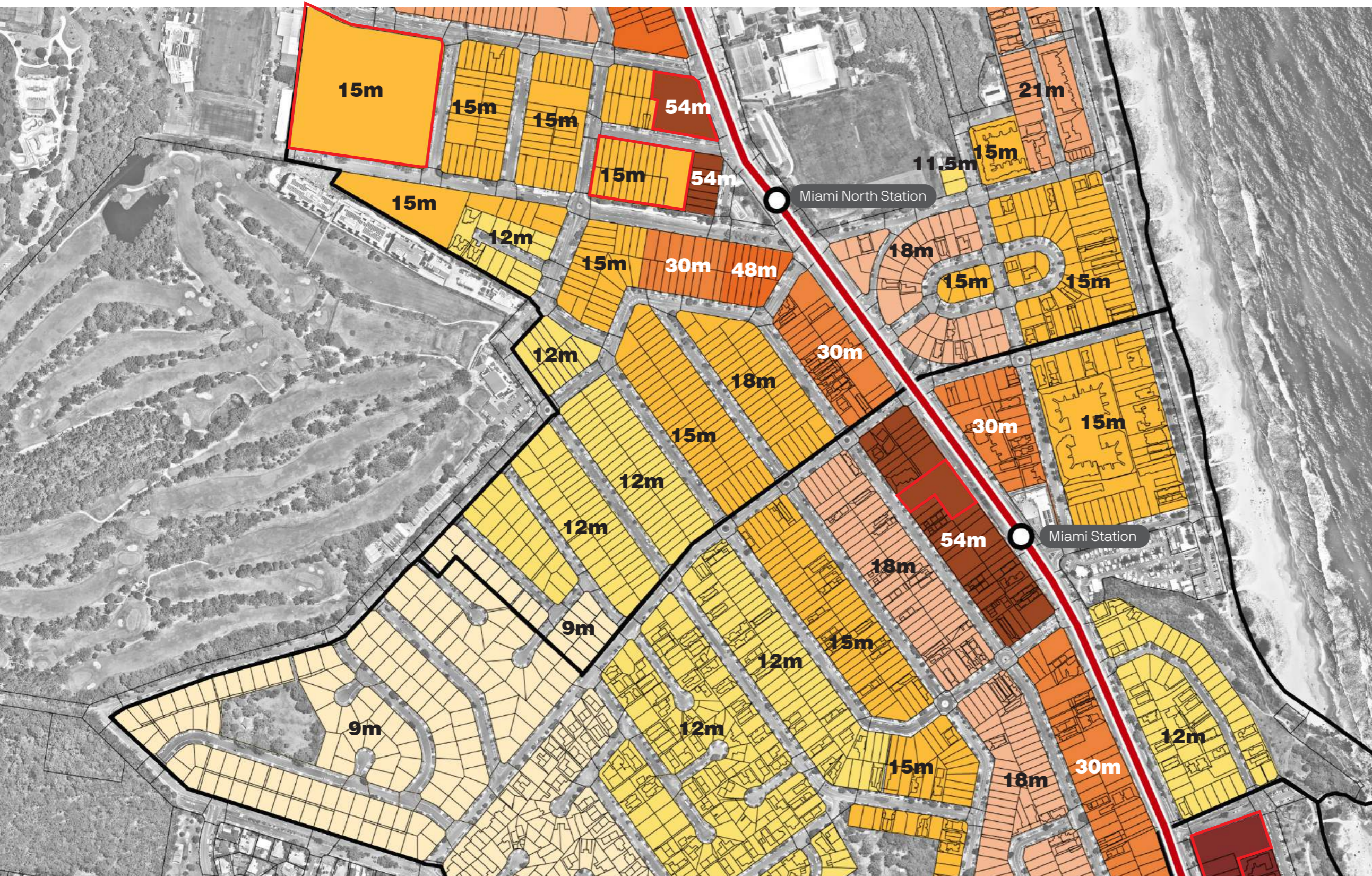
Legend

- GCLR Stage 3 indicative route
- GCLR Stage 3 indicative station
- Station Neighbourhood Boundary

Maximum building height potential

- 9m
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- 21m
- 30m
- 48m
- 54m
- 55m
- 79.5m
- Key Sites





Stage 3 Light Rail

Miami North Station

Miami Station

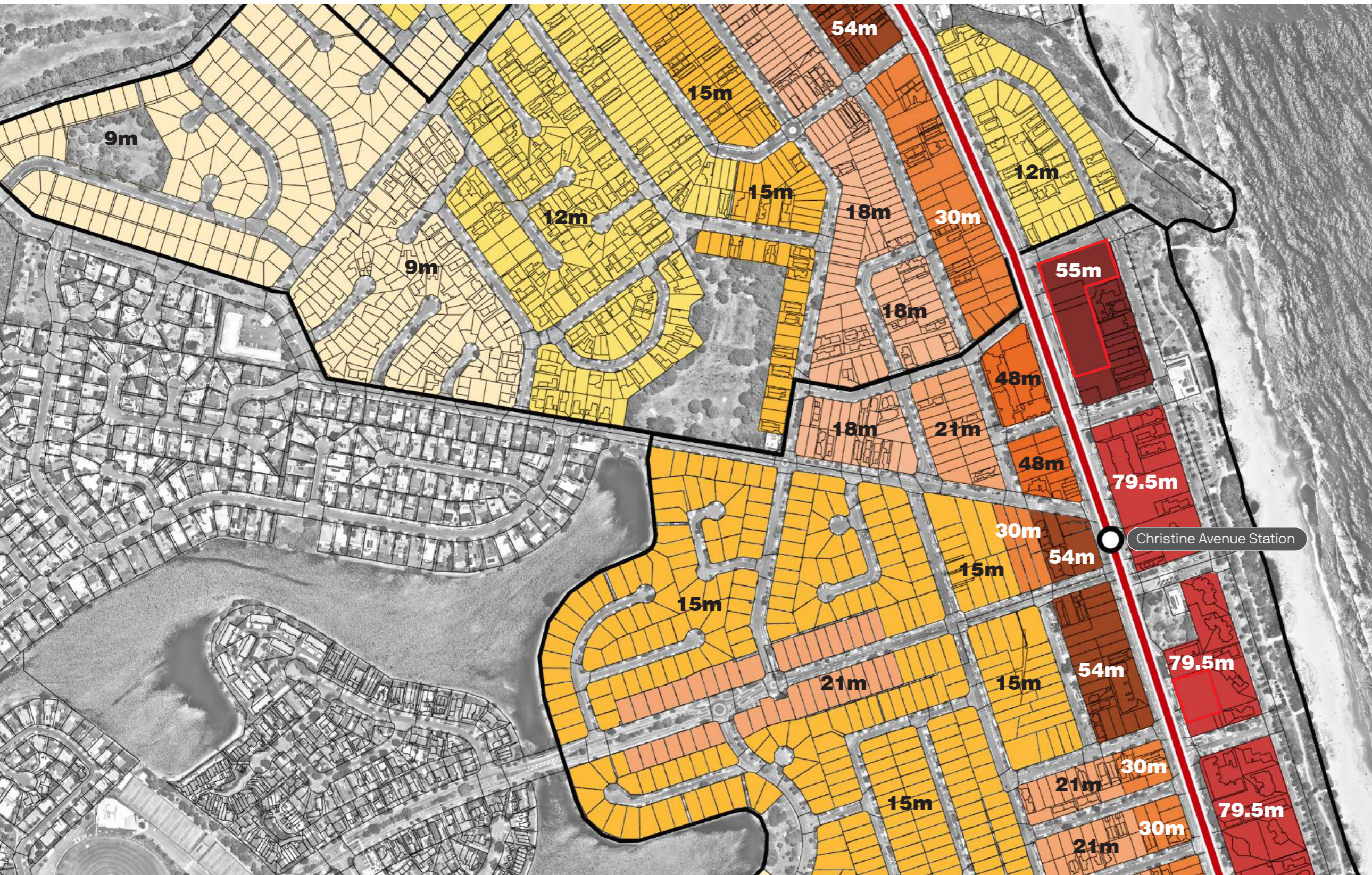
Legend

- GCLR Stage 3 indicative route
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- Station Neighbourhood Boundary

Maximum building height potential

- 9m
- 12m
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- 18m
- 21m
- 30m
- 48m
- 54m
- 55m
- 79.5m
- Key Sites





Stage 3 Light Rail

Christine Avenue Station

Legend

- GCLR Stage 3 indicative route
- GCLR Stage 3 indicative station
- Station Neighbourhood Boundary

Maximum building height potential

- 9m
- 12m
- 15m
- 18m
- 21m
- 30m
- 48m
- 54m
- 55m
- 79.5m
- Key Sites





Stage 3 Light Rail

Second Avenue Station

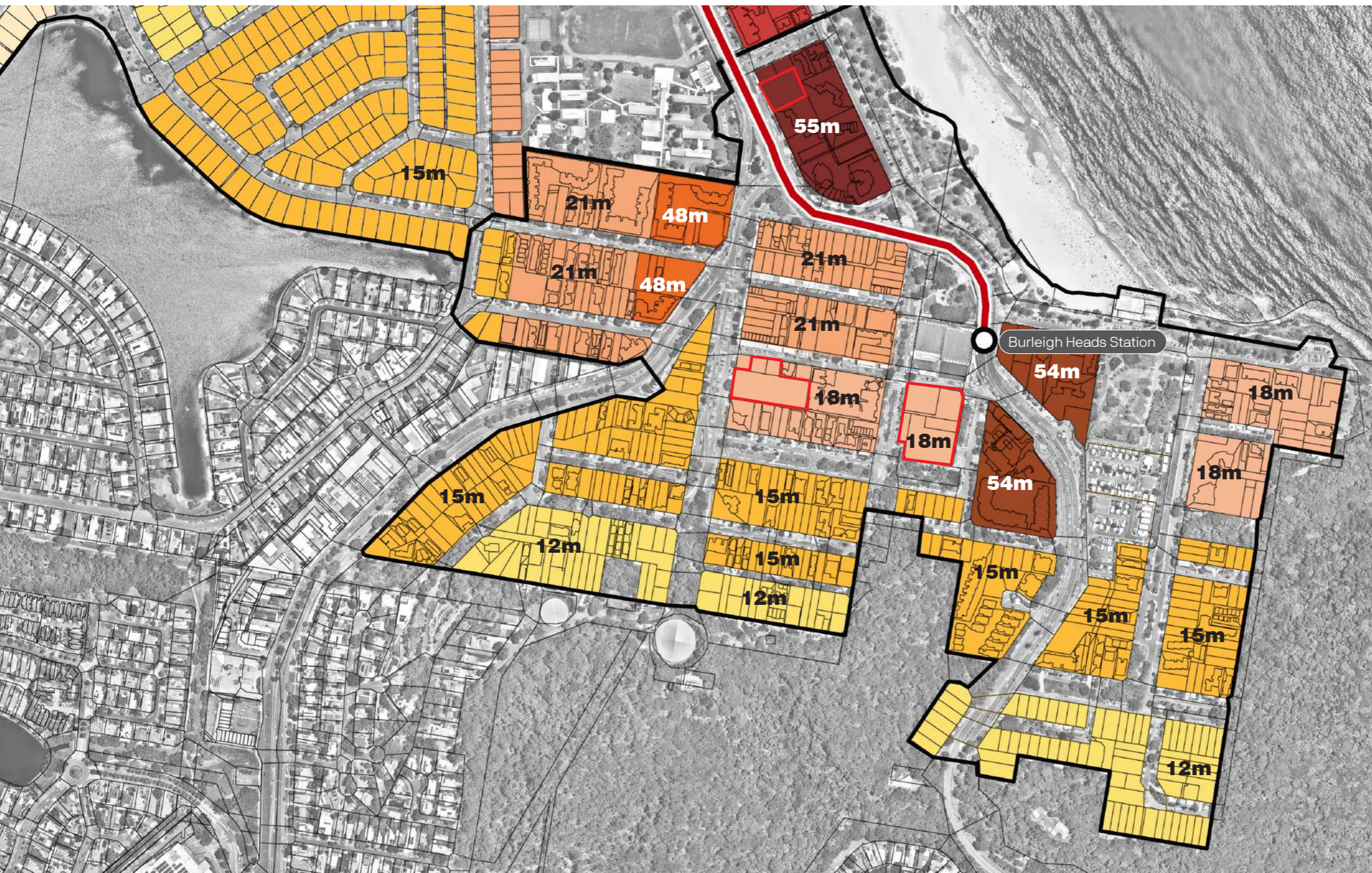
Legend

- GCLR Stage 3 indicative route
- GCLR Stage 3 indicative station
- Station Neighbourhood Boundary

Maximum building height potential

- 9m
- 12m
- 15m
- 18m
- 21m
- 30m
- 48m
- 54m
- 55m
- 79.5m
- Key Sites





Stage 3 Light Rail
Burleigh Heads Station

- Legend**
- GCLR Stage 3 indicative route
 - GCLR Stage 3 indicative station
 - Station Neighbourhood Boundary

- Maximum building height potential**
- 9m
 - 12m
 - 15m
 - 18m
 - 21m
 - 30m
 - 48m
 - 54m
 - 55m
 - 79.5m
 - Key Sites

