

Redland City Council draft Local Government Infrastructure Plan Submissions Report (October 2017)

Acronyms

- LGIP – Draft Local Government Infrastructure Plan
- PIA – Priority Infrastructure Area
- LDA – Local Development Area
- LGA – Local Government Area
- Draft City Plan – Draft Redland Planning Scheme
- PIP – Redland Priority Infrastructure Plan 2011
- SEQRP - South East Queensland Regional plan 2009-2031
- DILGP – Department of Infrastructure, Local Government and Planning
- QTT - Queensland Treasury and Trade
- NIEIR - National Institute of Economic and Industry

Submission ID	Grounds of submission	Assessment	Recommendation
1.0 Consultation			
002 003 004	• Lack of notice of the draft LGIP. • Council agree to receive and consider supplementary submissions under preparation. • Industry input be sought so that the planned densities, land use and yield provision, infrastructure, PIA and development timeframes are more certain and respond to growth and changing markets. • There has been an absence of consultation with landowners as encouraged in the statutory guidelines for major amendments to a planning scheme.	Consultation has been an open and transparent process with the community that provided an opportunity to contribute to infrastructure planning in the City. Consultation was undertaken in accordance with Statutory Guideline 01/16 with a formal submission period from 5 July to 16 August 2017. Public notice was given and all relevant information was uploaded to Council's 'Your Say' web site including a mapping portal. Paper copies of the draft LGIP and all extrinsic material was available for inspection and purchase at all major Council service centres. A supporting planning assumptions background report was included in the material. There was an opportunity to ask questions on-line during the submission period.	Not applicable.
2.0 Planning horizon			
002	The LGIP planning horizon should be 15 years to provide clarity around infrastructure planning and funding.	The draft LGIP planning horizon spans from 2016 to 2027. Council originally set the horizon to 2026, however DILGP requested Council expand the timeframe to 2027 to ensure there is a minimum of 10 years by adoption. (2018-2027 is 10 years inclusive).	No change.

		The 10 year planning horizon ensures a closer alignment with Council's Long Term Asset Management Plan and Long Term Financial Forecast as supported by the 10 year Capital Program DILGIP was satisfied with the 10 year planning horizon following the first State interest review.	
3.0 Population and dwelling assumptions			
<i>3.1 2016 Census data</i>			
002	Variance between dwelling and population numbers used and the 2016 census: • The LGIP overestimates 6,656 people compared to the 2016 census. • The LGIP underestimates residential dwelling by 5,919 compared to the 2016 census. • 2016 census date conflicts the OSGO projections for 2026-2041. • Population predictions for Double Jump Road area (post 2027) are significantly lower than the PIP, population yield should be in line with the SEQRP density targets (15 dwellings per hectare). Request Council seek a population projections update from the State Government based on the 2016 census and undertake a revised population and dwelling projection.	The draft LGIP planning began immediately after the former PIP came into effect in 2012. The 2016 census data was not released until June 27, 2017 after the draft LGIP had progressed through the first compliance check and Minister's review. The assumptions behind the draft LGIP were the most current available at the time. Requesting a revised population and dwelling projection this late in the process is not reasonable, practical or required under the Statutory Guideline 03/14. The draft LGIP will be reviewed and amended at least every 5 years to consider new and revised data. Where appropriate, interim amendments may also be considered to keep the plan contemporary. It should also be noted that the 2016 Census shows total occupied private dwellings in the City at 52,446. The draft LGIP is marginally higher than this figure, not the underestimation stated in the submission.	No change.
<i>3.2 Growth modelling scenarios</i>			
002	Higher and lower growth scenarios should be tested to ensure Council understands and is prepared for the financial obligations of growth.	The growth assumptions modelled are consistent with the Statutory Guideline 03/14. The projections are based on a combination of the 2011 and 2015 medium series population and dwelling projections by QTT.	No change.
<i>3.3 Giles Consulting Land Supply Report 2014</i>			
003	Material relied upon by the submitter claims the LGIP	The Giles Consulting Land Supply Report 2014 relied upon by the	No change.

	assumptions overstate future land and housing supply, while understating demand. The material makes the following observations in relation to an assessment of the 2013 QTT Broadhectare Study and 2014 Urbis projections: • The very higher dependence on the smallest parcels of land for future supply; • The very low availability of large parcels of land; • The extremely high conversion rate from Theoretical to Expected yield; • The very high dependence on higher density residential development; • The use of dwelling occupancy rates that do not reflect long term trends; • The apparent lack of an allowance for unoccupied dwellings.	submitter is dated, contains inaccuracies and is subjective. It references QTT and Urbis projections that have been superseded. The draft LGIP is drawn from the 2016 Urbis and 2015 QTT projections as detailed in the Background Planning Assumptions Report. The Giles Consulting Land Supply Report 2014 was prepared for the Shoreline Estate preliminary approval application, which following permit approval, has now added some 4,000 future dwellings to broadhectare supply. It does not recognise the requirement for local governments to achieve housing consolidation targets under the SEQ Regional Plan. Currently, only 4,700 expansion dwelling units are required for the Redlands to 2041. The data comparison with other local governments does not take into account the high level of constraints to broadhectare land in the Redlands, which contribute towards consolidation by necessity. These factors were taken into account as part of QTT's broadhectare analysis and assumptions underlying the current and superseded regional plans. Importantly, as at June 2017 QTT figures indicate that the Redlands still maintains a broadhectare stock of 416 hectares achieving a dwelling yield of 7,258 dwelling units under a medium scenario. 35% is identified as suitable for standard urban density residential development beyond the 10 plus year horizon. The report inaccurately states that the Redlands has an overly high conversion efficiency compared to other SEQ metro local governments. The underlying assumption of the Urbis 2012 projections state that 15% of the yield for parcels between 1,500 and 5,000sqm is lost within the planning horizon. This is consistent with other councils.	
--	---	--	--

		The theme raised in the report that smaller land parcels are not cost effective to develop is inaccurate as a significant proportion of residential redevelopment in the city is small yield reconfigurations. This is supported by lot approval data over the last three years which shows the leading project size category, in terms of number of projects, was projects of 1 to 2 lots, with 70 projects alone approved in 2017, representing 79% of total projects approved. Projects of 21 to 50 lots representing only 50% of total lots approved (source: QTT Residential land development activity profile - Redland LGA June 2017). Similarly, the claim that home ownership barriers are entirely a supply side problem is not supported by the documented evidence, including that of the productivity commission. The 2016 Urbis projections that were used to inform the draft LGIP are not only benchmarked to the 2015 QTT projections but also the variable occupancy rates assumed in the State data. While the 2016 Urbis modelling used to inform the draft LGIP infrastructure demand models did not directly address unoccupied dwellings in the projections, 2016 census data indicates there has been no change in the unoccupied dwellings of 9% from the 2011 census. This indicates the stock of unoccupied dwellings is static and not an outlier that would weaken the veracity of the Urbis projections.	
3.4 Land and housing supply and demand			
003	- Submission advice is that unoccupied dwellings account for about 10% of the Redland housing stock, whereas the planning assumptions report concludes that all dwellings are occupied. LGIP understates demand by about 10%. - Forecasting occupancy rates is difficult. E.g. the	Refer to Assessment of Theme 3.3 concerning the issue of unoccupied dwellings. Occupancy rates used in the 2012 and 2016 Urbis projections have been benchmarked to 2015 QTT rates.	No change.

	planning assumptions for Victoria Point project detached dwelling occupancy rates to fall from 3.21 in 2016 to 2.87 in 2031. It is hard to reconcile this relatively small decline as the projected age Victoria Point age population from 2016 to 2031 that will see those 60 years and over accounting for 82% of the increase in the population. Given the projected ageing in the majority of Redland City SA2s and the predominance of detached housing, submission advice is that it is difficult to see that detached housing occupancy rates would not fall faster than those assumed.		
003	- The Planning Assumptions report assumes a 55% increase in the number of detached dwellings on the Redlands Islands from 2016 to ultimate development and 38% by 2031. If this allocation was not achieved due to socio demographic, economic and transport constraints, 2,000 detached dwellings would need to be relocated elsewhere. - The Redland Islands additional housing forecast is much higher in the Assumptions report than the supporting land and housing report used to validate the "<i>Planning Assumptions Redland City Land Supply Review</i>", Urbis, November 2012.	If the 2,000 detached dwellings were not delivered across the Redland Islands, the balance could be absorbed by the approximately 4,000 proposed dwellings (primarily detached) planned for the Shoreline master planned community (Shoreline did not form part of the draft LGIP projections). 2013 Broadhectare Study data used in the preparation of the SEQ Regional Plan 2017 also shows that an estimated 2,800 expansion dwelling capacity remains for the Redlands at 2041. The Redland Islands additional housing forecast is higher in the Planning Assumptions report as it takes into consideration the "<i>Population, Dwelling and Employment Forecasts</i>", of the Urbis May 2016 population, employment and dwellings forecasts using a combination of the 2011 and 2015 projections released by QTT.	No change.
003	- The <i>Urbis 2012 Land Supply Review</i>: Considers in scenario 1 that the Double Jump Area would be contributing 540 detached and 634 attached dwellings to supply in the period 2017 – 2012. - Considers scenario 2 that the Double Jump Area shall make 540 detached and 634 detached dwellings available for supply in the period 2016-2021 (see page 42). - Does not contain a scenario in which Double Jump	The Double Jump Road area requires structure planning under both the current IPA 2006 scheme and draft City Plan 2015. Both plans require the efficient provision of urban infrastructure to justify urban development of the area. As Council has not approved a structure plan to this point, it is not known what land uses or development yield is planned to be achieved and what infrastructure servicing response needs to be made. Further, the State's broadhectare estimates supporting the current SEQ Regional Plan growth (Appendix B to Background Paper 1)	No change.

	Road is developed in 2027 or later. This is significant as it directly contradicts the 2027 date that Council now adopts.	demonstrates that there is sufficient expansion capacity within the next 10 years without the area. Medium series broadhectare stock is currently (June 2017) at a dwelling yield of 7,258 with Regional Plan expansion forecast at 4,700 additional dwellings at 2041. A 4,056 dwelling yield is achievable in the first 10 years according to the broadhectare land supply data. This does not take account of the addition of some 4,000 dwellings from the Shoreline approval. Consequently, limited growth applicable to the underlying non-urban use of the land was included up to 2027. The Double Jump Road Local Development Area (LDA) is currently out of sequence in terms of planning for land use and infrastructure. The 2012 Urbis projections sequencing mapping identifies the Double Jump Road LDA as predominantly in the period 2026 to 2031. The 2016 Urbis projections include growth for the Double Jump LDA post 2027. Schedule 3 'Local government infrastructure plan supporting material' Table SC3.1.1 – 'Existing and projected population' and Table SC 3.1.4 – 'Existing and projected residential dwellings' allow for growth in the area in the years 2031 to 2041 based on 2015 QTT data. This is also recognised in Table 3.2 of the 2016 Urbis projections which identify an additional population of 1,775 people with 460 detached and 209 attached dwelling units.	
003	The yield for the Double Jump Road area has been underestimated by approximately 2000 dwellings.	Refer to previous Assessment.	No change.
4.0 Draft Redlands planning scheme and nexus to draft LGIP			

002 003	- Draft Planning Scheme should be amended to permit lots less than 400m2 in appropriate circumstances. - Increase infill development to address projected declining population and infrastructure efficiency. - Low amount of developable land greater than 10ha which limits development efficiency and integrated development. - Regional Plan and Shaping SEQ requires balance of greenfill and infill to supply the development industry. Lack of balance between infill and greenfield product within PIA with only SE Thornlands and Kinross Road precincts providing greenfield product.	Refer to Assessment of Theme 3.3 concerning the issue of expansion and consolidation, and broadhectare supply. Development is guided by the planning scheme instrument not the draft LGIP. The submission matters have raised outcomes of the future planning for the draft City Plan. The draft LGIP does not guide development independent of the planning scheme. The draft LGIP provides the necessary infrastructure to support the planned growth outcomes of the draft City Plan. These are not relevant grounds.	No change.
5.0 Priority Infrastructure Area			
002 003 004	- Development applications on behalf of Edgarange Pty Ltd and Sutgold Pty Ltd (ROL006166) and Ausbuild (ROL005912) have been submitted to Council for assessment over land within the Victoria Point LDA. Developer lead structure plans form part of these development applications for consideration by Council. - The Victoria Point LDA has been included in the urban footprint and included within the broad hectare dwelling calculations. Suitable for urban development within next 15 years. - Edgarange Pty Ltd and Sutgold Pty Ltd intend to commence construction in 2018 with the development of the application site and other holdings within the LDA to be completed by 2025-28. - Developer planned staged provision of infrastructure would be prejudiced by the omission in the PIA and could not be viewed as an appropriate or proper discharge of Council's functions under the <i>Planning Act</i>.	Active applications are with Council for the two sites mentioned in the submission matters. Both applications have been lodged and are required to address the superseded SEQRP outcomes for local development areas. Under the SEQ Regional Plan, Division 3.2 requires that subdivisions within a development area must be consistent with the future planning intent for the area. Under the current Redlands Planning Scheme 2006 the sites are zoned rural. Development for urban purposes is therefore only suitable where comprehensive planning is undertaken to justify the conflict with the scheme. This is recommended to take the form of a structure plan for the LDA. At present both applications are responding to information requested by Council regarding comprehensive structure planning for the location. Council has acknowledged the future growth of this location in the long-term planning horizon of the draft City Plan by recommending the land be included in the Emerging community zone. The applications will need to demonstrate how comprehensive planning can occur for the LDA area and coordinate infrastructure delivery. The LDA is not necessary to support the growth of Redland City and remains subject to comprehensive structure planning. The planning	No change.

	Include the Double Jump Road Local Development Area within the PIA	horizon contained within the draft LGIP reflects the draft City Plan. The site is not recommended to be included within the PIA.	
002	Areas left out of the PIA (such as Double Jump Road LDA and Shoreline) can restrict logical and appropriate development outcomes or substantially add to the costs of providing housing.	The Shoreline master planned community in Southern Redland Bay forms part of a nominated area in the draft City Plan Strategic Framework. The Double Jump Road LDA requires comprehensive structure planning in order to be considered suitable for urban development. The PIA contains sufficient developable land to accommodate the region growth assumptions within the planning horizon until 2027.	No change.
004	Development application by Ausbuild (ROL005912) proposes to construct sewer upgrade to service development providing a net benefit to the community.	Application ROL005912 is under assessment by Council. The draft LGIP cannot pre-empt the decision making process. The application remains subject to assessment for determination by Council. This is not a relevant consideration.	No change.
6.0 Background studies			
003	- Explain why the <i>Broadhectare Study for Redland City 2013</i> ("the <i>Broadhectare Study</i>") and Urbis Redland Residential Land Supply Review 2014 ("the <i>2014 Review</i>") are not referenced in Council's Background Report. - The planning assumptions failed to consider the Urbis <i>Redland Land Supply Review, 2014</i>.	Refer also to Assessment of Theme 3.3 concerning the issue of unoccupied dwellings. The Urbis Redland Residential Land Supply Review 2014 ("the <i>2014 Review</i>") projections have been superseded by the <i>Population, Dwelling and Employment Forecasts, Urbis, May 2016</i> that is referenced in Council's planning assumptions background report to the draft LGIP. The 2014 Urbis projections were developed with reference to the 2013 QTT projections, whereas the more contemporary and relevant 2016 Urbis projections used for the draft LGIP were aligned to the current 2015 QTT (medium series) dataset. The 2013 QTT edition projections were based on data from the 2011 Census of Population and Housing and demographic information available at the end of 2013. Population growth in Queensland has moderated since the release of the 2013 QTT edition, primarily due to lower than expected overseas and interstate migration. As a result, the 2015 QTT edition medium series projections which updated the 2011 base population to 2014 estimates show a	No change.

		smaller population broadly throughout Queensland over the projection horizon relative to the 2013 QTT edition. The 2015 QTT edition used the more contemporary land supply capacities to allocate dwellings to population based on: • vacant lots; • assumptions about the likely location and timing of infill; • recent land subdivision and dwelling construction activity; and • areas of greenfield land and their expected dwelling density and development timing. Consequently, the available land stock based on dwelling projections set against updated demand arising from the 2015 population estimates indicate that there is more supply than identified in the 2013 QTT Broadhectare Study. Further, this study had no specific timing for the Double Jump Road LDA with other areas accounting for the necessary land availability within the timeframe of 10 plus years. The Double Jump Road LDA is therefore not currently needed for supply within the 2027 horizon of the draft LGIP. As the 2016 to 2027 planning assumptions were based on the 2011 QTT projections (as there was only a minor difference to the 2015 QTT projections) the planning assumptions relied on the corresponding <i>Redland City Land Supply Review, Urbis, November 2012</i> that focussed on 2011-2031. Whereas the <i>Urbis Redland Land Supply Review, 2014</i> extended the planning horizon to 2041.	
003	Councils assumption of an almost 100% conversion from theoretical to actual development is significantly out of line with other LGAs.	The conversion assumption is underpinned by the Shoreline master planned community which did not form part of the draft LGIP projections that is forecast to provide an additional 4,000 dwellings. The uptake of these additional dwellings would significantly lower the conversion rate from the stated 100% and reflect that of surrounding LGAs. The conversion assumption is also consistent with the Statutory Guideline 03/14.	No change.
003	• Clarify why a combination of 2011 and 2015	Significant progress had been made in the development of	No change.

	Queensland population projections were used. Clarify why Council used 2011 projections up to 2026 and then 2015 projections for beyond 2026.	infrastructure Demand Modelling based on 2011 projections prior to the release of the 2015 QTT projections. Consequently, Urbis was asked to consider the relationship between the 2011 QTT projections, the Redland City Land Review, Urbis November 2012 and the 2015 QTT projections. Recognising the 2015 projections were only slightly lower than the 2011 projections, Urbis determined the estimates for the 2011 to 2026 were still valid and could reasonably be used for infrastructure planning purposes. The 2015 QTT projections were used for 2026 to 2041 as Urbis considered that the variation between the 2011 and 2015 projections for this period of enough significance to use the 2015 predictions.	
003	Clarify why the planning assumption report did not use the Queensland Treasury Employment projections as used by the 2017 SEQ Plan for employment figures.	The NEIR prepared employment forecasts in 2015 for the Redlands on behalf of the South East Queensland Council of Mayors. Urbis adopted the NIEIR projections in conjunctions with the ABS 2011 Census Place of Work data in favour of the QTT projections. The State approved the NEIR projections as part of the first compliance check.	No change.
005	Remove the “Redland City Centres & Employment Strategy Review”, Urbis 2013 from the LGIP Extrinsic Material.	Agree to remove the “Redland City Centres & Employment Strategy Review”, Urbis 2013 as does not form part of the LGIP Extrinsic Material.	To be removed from the draft LGIP.
7.0 Mapping			
003	PIA map be amended to provide legibility at lot level to be compliant with the statutory guideline (MGR, section 20.2)	Mapping is consistent with the requirements of Statutory Guideline 03/14 and has progressed through the first compliance check and Minister’s review. Lot level detail is however provided beyond the statutory requirements in the form of Council’s electronic online spatial information program. This is available to all users electronically.	No change.
005	Review the draft Local Government Infrastructure Plan mapping	Agree to amend the draft LGIP mapping anomalies/errors.	Change the

	and correct all anomalies/errors prior to re-submission for second state interest check, including but not limited to, - The extent of Serpentine Creek Road mapped as a local road; - Appropriate mapping terminology for the southern bay Moreton bay islands (SBMBI); - Legend display errors; and - Any duplication of a unique map reference.		network mapping for the draft LGIP.
8.0 Schedule of Works			
002 003	Council is to reinstate the infrastructure included within the PIP to service the Victoria Point LDA within the LGIP. - Double Jump Road upgrade - \$18.88m (PIP mP19) - Bunker Road Park – Land - \$1.5m, embellishments - \$51,213 (PIP VPRP18) - Double Jump Road – Land - \$1.5,, embellishments - \$51,213 (PIP VPRP19) - Double Jump Road Sewer Pump Station - \$259,360 (PIP FPS8).	The PIP came into effect in 2012. The infrastructure items stated in the submission matters have been amended or removed from the draft LGIP schedule of works. - Double Jump Road upgrade remains in the draft LGIP however the desired standard of service has been revised based on Councils analysis of the greater road network. The draft LGIP includes a seal widening of Double Jump Road which is the necessary standard of infrastructure to be delivered to service the catchment developable areas under the draft City Plan and the draft LGIP PIA. - The Bunker Road Park and Double Jump Road Park as stated in the submission matter have been removed from the draft LGIP. The parks were included in the PIP to service the existing urban areas of Victoria Point as stated in the Redland Open Space Strategy 2026, and were not intended to service the LDA. Standards of service for this location have been revised and the parks are not considered to be necessary infrastructure and subsequently removed from the draft LGIP. - Double Jump Road Sewer Pump station as stated in the submission matter has been removed from the draft LGIP and draft Netserv Plan. Redland Water’s updated network modelling has determined this infrastructure is no longer required.	No change.
003	Explain change in cost of infrastructure item. PIP P38 is an item for the upgrade of Pitt Road / Nelson Road intersection and is costed at \$740,000. That item in the LGIP is identified as having a	The PIP in its assumptions for the transport network provided a high contingency cost of 40%. The draft LGIP has set the values of all future trunk infrastructure works at the base date of the	No change.

	value of \$502,687 (item TR-P-17).	planning horizon with contingencies at 25%. The value in the draft LGIP is correct and consistent with the costing methodology applied under the Statutory Guideline 03/14.	
005	Amend the Kinross Road trunk sewer network mapping/SOW to include: - FPS_A - Emergency storage - \$263,230 - FPS_A Pump station - \$263,230	Agree to amend the Kinross Road trunk sewer network mapping/SOW to include FPS_A as this was incorrectly removed from the PIP to draft LGIP.	Change the schedule of works and network mapping for the draft LGIP and draft Netserv Plan.
001	Infrastructure servicing Russell Island: - future bridge and road connections; and - additional road upgrades for barge landing sites.	The State Government is responsible for the approval, funding and construction of a mainland to Russell Island bridge. Redland City Council has previously lobbied the State to consider a bridge between the mainland and Russell Island in the South East Queensland Infrastructure Plan and Program, however at this point in time the State has not considered the request. The road infrastructure in proximity to the barge landing areas meets the desired standards of service, with any future road upgrades/maintenance being funded through Councils Capital Works Budget.	No change.
Desired Standards of service			
005	Include the following provision in Part 4 – Local Government Infrastructure, 4.3.5(1)(c) as (xi): (xi) the land is constrained by environmental protection through a planning instrument; This provision is a necessary additional delivery standard to ensure parks and land for community facilities can deliver the desired standards of service. Provision is consistent with the draft Redlands Planning Scheme, repealed Statutory Guideline 03/14 & 01/16 and all relevant Acts and planning instruments.	Determined to be a necessary delivery standard to ensure the usability of parks and land for community facilities can deliver the desired standards of service.	Change to include additional desired standard of service for parks and land for community facilities in draft LGIP.
General submission matters			
003	The LGIP fails to give consideration to the impact of Council's proposed district sporting fields at Heinemann Road on the surrounding road network.	The LGIP as part of the Public parks and land for community facilities network considered in the extrinsic material the Redland Sport Land Demand Study 2016. Council in response to this strategy has strategically acquired land at 277-293 Heinemann	No change.

		Road. The land with its recreational potential and environmental values will support future demand for sporting facilities in the Redlands while also protecting a significant area of natural habitat. The purpose and function of the land is currently subject to a detailed planning study to determine the best use of the site and provide recommendations for a future program of works. Any impact from traffic to the site on the surrounding road network will be considered as part of the detailed planning assessment with works recommendations made accordingly. Road improvement works are not included in the LGIP as the extent of traffic impacts are not known until the purpose and function of the land is determined through a detailed planning assessment. The unknown extent of any road improvement works are therefore not necessary infrastructure for the purposes of the LGIP.	
001	Increase passenger and services. Transport providers to the islands are operating under a monopoly arrangement.	Not in the scope or part of the function of the draft LGIP under the Statutory Guideline 3/14.	No change.
Administration matters			
005	Review the draft LGIP document and correct all anomalies/errors prior to re-submission for second state interest check, including but not limited to, a. Trunk collector to Major collector in the SOW table SC 3.2.4.	Agree to amend all anomalies/errors in the draft LGIP document prior to re-submission for second state interest check.	All anomalies/errors have been amended in the draft LGIP.