

Development Watch Inc

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17 September 2019

Mr Michael Whittaker
Chief Executive Officer
Sunshine Coast Council
Via e-mail (mail@sunshinecoast.qld.gov.au)

Dear Mr Whittaker

SUBMISSION
CODE ASSESSABLE DEVELOPMENT APPLICATION
MCU19/0123
MULTIPLE DWELLING UNITS – COOLUM BEACH

I am writing on behalf of Development Watch Inc to express our serious concern about the classification by your staff of the development application MCU19/0123 (the DA) as “code assessable”. The application is for the construction of 38 multiple dwelling units on five adjacent residential lots at Coolum Beach (the subject site).

We believe the classification should be raised to “impact assessable” because the dwelling density is more than 100% greater than is permitted on the development site and the site cover substantially exceeds permissible limits. Also, we believe there are other conflicts with the *Sunshine Coast Planning Scheme 2014* (PS2014) that warrant impact assessment.

DWELLING DENSITY

Equivalent Dwellings

The use of equivalent dwellings makes possible a valid assessment of dwellings for the purposes of determining car parking requirements, traffic impacts, dwelling density, impact on water use and other consequences of development proposals. This measure is directly related to the number of bedrooms in a dwelling. Development Watch believes this bedroom count should also include rooms that are capable of being converted to bedrooms.

PS2014 does not include a definition of ‘bedroom’. However, Council does employ a definition for ‘bedroom’ when determining infrastructure charges. It reads¹:

***bedroom** means an area of a building or structure which:*

a) is designed or intended for use for sleeping; or

¹Infrastructure Charges Resolution (No.7) 2017, Sunshine Coast Council, page 6.

- b) *can be used for sleeping such as a den, library, study, loft, media or home entertainment room, library, family or rumpus room or other similar space.*

Also, Council included a similar definition of bedroom in a recent Master Plan approval²:

Any room which is reasonably capable of being used as a bedroom will be regarded as a bedroom for the purposes of calculating on site car parking requirements (e.g. study, media room).

We strongly believe the multi-purpose rooms (MPRs) shown in the DA architectural drawings should be similarly included in the count of bedroom numbers.

The Limits to density

The number of dwellings permitted on a site is expressed in *equivalent dwellings*³ per hectare and is determined by considering the following:

- 1) **Coolum local area zone map.** This map shows the subject site as being in the Medium Density Residential Zone.
- 2) **Multi-unit residential uses code.** This code was recently amended by Council to increase the maximum permitted density from 50 to 80 dwellings/ha. The relevant part of this code now states⁴:

Except where otherwise specified in a structure plan or local plan code, the site density for a multi-unit residential use:-

- a) ...
- b) *is between 50 and 80 equivalent dwellings per hectare where in the Medium density residential zone, District centre zone or Local centre zone and the Height of buildings and structures overlay provides for a building height exceeding 8.5 metres; and*
- c) ...

The subject site is in the medium density residential zone so development is constrained to 80 dwellings/ha, subject to further constraints contained in the Coolum Local Plan Code. There is no structure plan for the Coolum Local Plan area.

Analysis of MCU19/0123 Equivalent Dwellings

We have provided, at [Attachment 1](#), an analysis of the 38 multiple dwelling units in the proposal. Multi-purpose rooms (IMPRs) shown on the DA architectural plans are included in this analysis. It shows that the dwelling density for the proposal is 171 equivalent dwellings/ha. This is more than double the number of equivalent dwellings permitted on the site.

The number of equivalent dwellings proposed for the site is 50. This must be reduced to no more than 23 to comply with the Multi-unit residential uses code, subject to further constraints by the Coolum local plan code.

²Development Agreement, Development Control Plan 1 Kawana Waters and Section 316, Sunshine Coast Council, page 17.

³PS2014, Schedule 1, (Definitions).

⁴Extracted from "Proposed Sunshine Coast Planning Scheme 2014 (Major Amendment) No. [to be inserted] – Site Specific and Operational Matters Post Notification Ministerial Review Version June 2019". . This amendment was approved by Council on 20 June 2019 but has not yet been published in PS2014.

AGGREGATION OF LOTS

The subject site is a consolidation of five multiple dwelling lots that total 0.2876ha. Two major effects of this consolidation are:

- Open space that results from boundary setbacks is much less than if the lots were developed separately' and
- Construction of a building that is well beyond the scale of surrounding buildings is possible.

Development Watch is very concerned that acceptance by Council of this proposal as code assessable will result in a plethora of infill developments that aggregate lots and are out of character with their surroundings. Such developments would be inappropriate in the context of PS214's intent for the Coolum Local Plan Area.

THE ASSESSMENT CODES

The development is composed of two buildings. However, they are separated by a corridor no more than 2m wide. Thus, the development presents itself to observers as one very large building. This building mass is not characteristic of Coolum identity and, even if buffered by landscaping, has the strong potential to appear out of place. This is particularly so as the site is easily observable from higher surrounding land. Attachment 2 shows an aerial view of the site and a view of the site from Point Perry. When viewed from Point Perry and other viewpoints to the east, the development will give the appearance of a five-storey building.

Coolum Local Plan Code

The Coolum Local Plan Code states:

Development provides for buildings, structures and landscaping that are consistent with, and reflect the low key beachside character of, the Coolum local plan area in that they are integrated with the natural and coastal landscape and skyline vegetation in terms of scale, siting, form, composition and use of materials⁵.

The DA does not comply with these outcomes.

Medium density residential zone code

The Medium density residential zone code states:

- *development that is multi-storey ensures that there is no unreasonable loss of amenity for surrounding premises having regard to:-*

(iii) impacts upon views and vistas; and

(iv) building massing and scale relative to its surroundings⁶;

⁵ Coolum local plan code, 7.2.8.4 Assessment criteria, PO1

⁶Medium density residential zone code, 6.2.2.2 (2) (h)

- *development is designed and located in a manner which makes a positive contribution to the streetscape and is sympathetic to the existing and intended scale and character of surrounding development;*⁷

The DA does not comply with these outcomes.

Multi-unit residential uses code

The purpose of the Multi-unit residential uses code will be achieved through the following overall outcomes:-

- (a) a multi-unit residential use is visually attractive, with a built form which addresses the street and integrates with surrounding development;*
- (b) a multi-unit residential use incorporates building design that responds to the region's subtropical climate as well as the character of the particular local area;*
- (c) a multi-unit residential use incorporates high quality landscapes and well designed and useable communal and private open space areas that provide visual relief to the built form; ...*⁸

The multi-unit residential use is sited and designed in a manner which:-

- (a) maximises the retention of existing vegetation and allows for spaces and landscapes between buildings;*
- (b) allows sufficient area at ground level for communal on site facilities, resident and visitor parking, landscapes and maintenance of a residential streetscape; and*
- (c) demonstrates 3 dimensional modelling that reduces:-*
 - (i) the scale and bulk of the building; and*
 - (ii) the appearance of continuous blank walls*⁹.

The DA does not comply with these outcomes. We believe a reduction in site cover to acceptable levels would provide scope for compliance with many of these required and desired outcomes. An acceptable outcome would be to reduce the site cover to 40%. The subject Application has a site cover of over 60%. Despite the Applicant's questionable claims that the development complies with the nominated performance outcomes, this Application obviously needs to be treated as Impact Assessable and dealt with accordingly.

⁷Medium density residential zone code, 6.2.2.2 (2) (i)

⁸ Multi-unit residential uses code, 9.3.11.2, Purpose and overall outcomes, (2)

⁹ Multi-unit residential uses code, 9.3.11.3.1 Performance outcomes and acceptable outcomes, PO7

CONCLUSION

Development Watch is extremely concerned that approval of some development applications in the Coolool local plan area may not comply with the Performance Outcomes and Acceptable Outcomes criteria set out in PS2014. These requirements were drafted in close consultation with the local community and clearly set out their aspirations and expectations. Where a development application in this precinct seeks to substantially exceed or over-ride the PS2014 acceptable outcomes it deserves to be given close scrutiny by the community.

At the very least it should be designated Impact Assessable, with the associated community appeal rights. Development Watch requests that you have your officers urgently review the classification of this MCU/0123 DA and have it designated impact assessable before any further consideration of its relative deficiencies or merits are made.

Yours sincerely

A handwritten signature in cursive script that reads "Estelle Blair".

Estelle Blair
President
Development Watch Inc

Cc: James Ruprais, Group Executive, Community Engagement and Planning Services

Attachment 1

BUILDING NUMBER	LEVEL	UNIT TYPE	QTY OF TYPE	BEDS	MPR	EQUIVALENT DWELLINGS	
1	4	D	1	3	1	1.70	
	3	A	1	3	0	1.35	
		B	1	3	0	1.35	
		C	1	3	0	1.35	
	2	A	1	3	0	1.35	
		B	1	3	0	1.35	
		C	1	3	0	1.35	
	1	A	1	3	0	1.35	
		B	1	3	0	1.35	
		C	1	3	0	1.35	
	G	A	1	3	0	1.35	
		B	1	3	0	1.35	
	2	3	O	1	3	1	1.70
			P	1	3	1	1.70
		z	E	1	2	0	1.00
F			2	3	1	3.40	
G			1	3	0	1.35	
H			1	3	0	1.35	
I			1	2	0	1.00	
K			1	2	0	1.00	
M			1	2	1	1.35	
N			1	2	1	1.35	
1	E	1	2	0	1.00		
	F	2	3	1	3.40		
	G	1	3	0	1.35		
	H	1	3	0	1.35		
	I	1	2	0	1.00		
	K	1	2	0	1.00		
	L	1	2	0	1.00		
G	E	1	2	0	1.00		
	F	2	3	1	3.40		
	G	1	3	0	1.35		
	H	1	3	0	1.35		
	I	1	2	0	1.00		
	J	1	2	0	1.00		

Total dwellings = 38

Total equivalent dwellings = 50.95

Site area (ha) 0.2876

Proposed Dwellings/ha 177

Contains multi-purpose rooms



MCU19/0123 DEVELOPMENT SITE AT FIRST BAY, COOLUM BEACH



VIEW OF SITE FROM POINT PERRY