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To: Mr Dale Dickson

Chief Executive Officer City of Gold Coast

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By email: CityPlanSubmissions@goldcoast.qld.gov.au

Subject: Submission to Our City Our Plan (Major Updates 2 and 3) – Round 2 consultations

This submission documents my comments on the draft *Our City Our Plan (Major Updates 2 and 3) – Round 2 consultations* and is made as part of the community consultation process closing 5.00pm 12 February 2020.

Theme 1: Height and density

Proposed change	Grounds and recommendations
<p><u>Items 1 and 2: Building height overlay map and new building height categories</u></p> <p>Reduce building heights along Jefferson Lane in Palm Beach to respond to infrastructure constraints.</p>	<p>This change is supported. However, there needs to be further clarification regarding the future planning intent for Jefferson Lane. Jefferson Lane is the de facto boardwalk and key pedestrian connection for Palm Beach locals and tourists and there are safety issues involved in its use at present.</p> <p>Recommendations:</p> <ul style="list-style-type: none">• As a matter of priority undertake a Jefferson Lane character study and urban design plan that clearly addresses issues of pedestrian prioritisation and safety, overshadowing, access to winter sun, wind tunnel and downwash (the adverse effects of the new buildings was clearly demonstrated during recent strong southerly winds), setbacks, reduction of heat island effect (retention of permeability at ground level for pedestrians), nominating percentage of deep soil and trees, street trees, controls for services and driveways.• Develop the character study and urban design plan in full consultation with the local community.

Proposed change	Grounds and recommendations
<p>Reduce building heights in the Currumbin neighbourhood centre zone to 12 metres to ensure built form remains complementary to the surrounding area.</p> <p>Modify the Strategic framework to emphasise that the future Light Rail corridor (from Broadbeach to Coolangatta) cannot be used to justify increased heights and densities until appropriate investigations have been done.</p> <p>Improve administration definitions for all building height categories to link the Building height overlay map to the Strategic intent while ensuring the categories are not used to justify greater heights in development applications.</p>	<p>Supported. However, concern remains regarding the 12 months available to developers for applications under the superseded planning arrangements.</p> <p>The intent of this proposal is supported, but the mechanism by which it is proposed to operate may not be effective in delivering the desired outcome. It appears the proposal is intended to reassure residents along this corridor that the excesses of building relaxations that have blighted Palm Beach, for example, are not repeated. However, since the 50% height exceedance allowance still exists along this corridor and neither setbacks nor site cover have been proposed by council as triggers for impact assessment what degree of confidence can residents have that developers will not still receive large relaxations, while residents in the suburb are silenced with code assessment on which there is no public comment? Whatever “appropriate investigations” mean, they are may be years away. Significant concerns remain that this proposed amendment will not be enough to control the excessive relaxations that are routinely sought by developers through the code assessment pathway. If development applications are made under code assessment, then there is NO ability to refer to the Strategic framework for guidance when determining the assessment. How then can changes to the Strategic framework deliver better control over increased heights and densities sought under code assessment applications?</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Strengthen the amendments to guarantee that the future Light Rail corridor (from Broadbeach to Coolangatta) cannot be used to justify increased heights and densities until “appropriate investigations” have been done. • Clarify or better define the meaning of the term “appropriate investigations” in the City Plan amendments. <p>This proposal is supported. Some additional refinements should be added, as follows.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Building heights need to be linked to a policy for ‘floor to floor heights’ for commercial and apartment developments. • Floor to floor heights need to be mandated for ground floor (commercial, residential lobby, retail) and for apartments. • Lift overruns and plant (airconditioning, etc) need to be below the height limit.
<p><u>Item 3: New Low-medium density residential zone</u></p> <p>Introduce provisions in the Multiple accommodation code to support an 800m² minimum lot size for Multiple dwellings greater than 12 metres in height in the Low-medium density</p>	<p>This change is supported. Some additional refinements should be added, as follows.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • A design guide, similar to the NSW Apartment Design Guide (https://www.planning.nsw.gov.au/Policy-and-Legislation/Housing/Apartment-Design-Guide) or the Victorian Better Apartments Design Standard (https://www.planning.vic.gov.au/_data/assets/pdf_file/0024/9582/Better-Apartments-Design-Standards.pdf), should be

<p>Proposed change residential zone.</p> <p>Introduce a new provision in the Low-medium density residential zone to regulate roof form to ensure the intended three storey height can be achieved.</p>	<p>Grounds and recommendations linked to the zone as policy.</p> <p>This change is supported. Some additional refinements should be added, as follows.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Regulation of roof forms should not focus alone on ‘roof feature’ requirements but also address requirements for small roof terrace areas (to limit noise and overlooking), the amount of shade for terrace users, green roofs, limiting impacts of plant rooms, lift overruns etc. If the quality aesthetics of roof areas are to be assessed the assessment should be by an independent panel of highly qualified architects urban designers and landscape architects. • Requirements for buildings to be able to provide thermal comfort without reliance on airconditioning would improve the building stock for future resilience.
<p>Theme 2: Built form and urban design</p>	
<p><u>Item 9: Built form improvements</u></p> <p>Modify the content and layout of the Site Context and Urban Design Policy (SC&UD) and the relevant zone code provisions that relate to urban context.</p>	<p>Modification of the content and layout of the Site Context and Urban Design Policy (SC&UD) and the relevant zone code provisions is supported but needs to be taken much further so that the intent of SCUD and Design Principles can apply to code assessable applications. The current development assessment system process, especially through code assessment, as applied by City of Gold Coast is inconsistent and is not delivering the balanced outcomes expected by the community.</p> <p>For example, and with few exceptions the design quality of the most recent apartment building developments along Palm Beach is poor - the buildings are oversized, overshadowing, out of context, unsustainable hot boxes with poor setbacks, inadequate landscaping and unsatisfactory aesthetic judgement. They downgrade the area and negatively impact neighbours, streets, beaches and parks, and compromise the development opportunities on adjacent sites. The city is losing the very qualities that attract and retain people, investment and businesses.</p> <p>These negative outcomes stem from the excessive relaxations being granted in development approvals. The community expects the provisions of City Plan to be followed and upheld by council, and not be relaxed to such an extent that they become meaningless. Unless action is taken to ensure the development assessment process is consistent and given some real teeth then the same sort of development approvals disaster emerging at Palm Beach and diminishing the streetscape and lifestyle amenity of its residents will continue across the entire city. Better, mandated apartment development guidelines and an expert, independent design review process would go a long way to improving the quality of urban renewal across the Gold Coast (and providing some real teeth to the development assessment system). Such a system has operated successfully for 13 years in NSW linked to the NSW Apartment Design Guide. An adapted version of this framework is needed for the City of Gold Coast. By comparison the Sunshine Coast Council, after significant community consultation, has published a Sunshine Coast Design book to better articulate and visualise the aspirations and expected design outcomes of the community (https://www.sunshinecoast.qld.gov.au/Development/Development-Tools-and-Guidelines/Sunshine-Coast-Design/Sunshine-Coast-Design-Book). This is an initiative the Gold Coast should adopt. The Sunshine Coast Council also operates an Urban Design Advisory Panel (UDAP) comprised of highly qualified independent professionals (urban</p>

Proposed change	Grounds and recommendations
<p>Modify the setback provisions in the high density residential zone code and the light rail urban renewal overlay code.</p> <p>Introduce a tower base height for development outside the light rail urban renewal overlay area in the Strategic framework.</p>	<p>designers, architects, environmental engineers and landscape architects) who provide expert advice to help review and update the planning scheme and comment on major development proposals.</p> <p>The Gold Coast has the potential to become an outstanding sub-tropical global city. Based on its current trajectory, however, it will not reach this desirable future status unless there are significant changes to its planning provisions and development assessment processes. The city needs to establish a much stronger overarching control system for design quality.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Develop a Gold Coast Design book and an independent review system to ensure its consistent implementation. • Undertake independent review of proposals by expert design review panels (highly qualified urban designers, architects, environmental engineers and landscape architects) to create quality built environments on the Gold Coast. • Use the recommendations from the independent design review panels to better inform the development assessment and approval process by providing authoritative, defensible advice that will deliver better outcomes for the community. This will help remedy the current Council development assessment and approval process, which is grossly out of balance in favour of the interests of developers, to the long-term detriment of the wider community. <p>This change is supported. However, all building facades at street level should, where no setbacks are mandated, be setback for a portion of their frontage to allow for deep planting.</p> <p>The separation between tower buildings has not been adequately addressed through the response to amendments. Indeed, the amendments 2 and 3 showed a reduction in tall building separation from 25 m to 18m for buildings up to 55m in height and 24m for buildings over 55m in height.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Setbacks and deep soil area requirements should be linked. Setbacks need to be large enough to accommodate large trees and ensure their viability. • Mandate that all building facades at street level, where no setbacks are mandated, be setback for a portion of their frontage to allow for deep planting. • Building separation in high density zone to be reinstated as minimum of 25m. <p>The restriction of a 5m podium height is welcomed, allowing for quality mixed use, foyer and atrium spaces. However, this proposal is opposed in its current form if it allows for above ground carparking. Tower bases (podiums) need to be considered in context with the desired character of the street. Podiums are detrimental to the amenity of neighbourhood streetscapes when they substantially constrain the provision of landscaping at street level, result in hot treeless footpaths, contribute to a cumulative canyon effect and generate unpleasant wind downwash effects (particularly in high wind weather). For these reasons podiums, unless very carefully designed, are inappropriate outside the light rail urban renewal overlay area as they completely undermine the strategic intent to establish the attractive, leafy and great neighbourhoods of the future. Podiums for parking arrangements are a relatively new feature of high rise or medium rise development and is not one beneficial to the visual amenity of the cityscape or the liveability of the streetscape. In the recent past all parking was in basements and it is strongly suggested that the City Plan should return to this.</p> <p>Recommendation:</p>

Proposed change	Grounds and recommendations
<p>Introduce ‘deep planting’ provisions for the Low-medium density residential zone code, Medium density residential zone code, High density residential zone code and Light Rail urban renewal overlay code.</p>	<ul style="list-style-type: none"> • Amend this provision to ensure that all basement car parking outside the light rail urban renewal overlay area must be underground and that no tower bases (podiums) are allowed as an acceptable solution, even with a 5 metre height limit. <p>The proposed introduction of ‘deep planting’ provisions is commended. This change is a landmark improvement to deliver a vibrant, leafy, sub-tropical city of the future, rather than the concrete jungle that many areas of the Gold Coast have become. However, concerns exist that under the performance-based planning framework the wording of the proposed provisions is not strong enough and that the full intent of these provision to deliver attractive, tree-lined streets will not be achieved.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • The provisions need to be strengthened to guarantee that deep soil plantings are unhindered by basements and below ground services. • Furthermore, minimum width and length of deep soil areas need to be mandated to guarantee the viability of the planted trees. As an example, similar provisions to ensure the success of ‘deep planting’ are contained in the NSW Apartment Design Guide (2015).
<p><u>Item 11: Light rail existing urban renewal overlay review</u></p> <p>Revise the Light rail urban renewal overlay code content and structure to improve its useability, remove any unnecessary duplication with the underlying zone code provisions and modify provisions to improve alignment with other parts of the City Plan.</p> <p>Modify the Light rail urban renewal overlay map to specifically reference the ‘maximum’ height of tower bases in relevant focus areas.</p>	<p>This proposal is supported in the targeted growth areas. However, it is also noted that there is an urgent need to clarify to the wider community the planning intentions for the light rail corridor. This was a major theme of concerns and questions at the City Plan town hall meeting on 21 January 2020 at Currumbin.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • A character study and urban design master plan should be undertaken for the streets through local villages (such as Palm Beach), other than the targeted growth areas, to ensure that any new transport infrastructure allows for continuous street trees, pedestrian prioritisation and high walkability. <p>Podium tower bases for car parking are strongly opposed.</p>
<p><u>Item 14: Driveways and vehicle crossings update</u></p> <p>Provide an additional option for a non-standard driveway design to be</p>	<p>Recommendations:</p>

Proposed change	Grounds and recommendations
<p>certified by an Registered Professional Engineer of Queensland (RPEQ) and reduce impacts on the higher order road network.</p> <p>Improve separation distances for developments proposing more than one driveway and vehicle crossing (e.g. a dual occupancy).</p> <p>Include a new provision for sites that front roads identified on the Functional road hierarchy and with two or more road frontages, to have their vehicle access from the road with the least on-road traffic.</p>	<ul style="list-style-type: none"> • Driveways need to be designed with minimal impact on pedestrian prioritisation and high walkability. Landscaped area must be provided immediately adjacent to driveway to enable shading of hard surfaces to reduce heat island effect. Driveways should be direct and covered by building or landscape. • An independent design review panel should be instigated to assist in the development of better outcomes. <p>Supported.</p> <p>Supported.</p>
Theme 3: Targeted growth areas	
<p><u>Item 15: Identified growth areas</u></p> <p>Reinstate the low density residential zone in certain parts of Labrador. Refine to zoning, building height and residential density in certain locations within Biggera Waters (including parts of Runaway Bay), Labrador and Southport West. The proposed refinements respond to the local neighbourhood qualities raised by the community, which were considered through the identification of individual sub areas within each targeted growth area.</p> <p>Remove Southport West from the Light</p>	<p>Supported.</p> <p><u>Recommendation:</u></p> <ul style="list-style-type: none"> • The same consideration of a local neighbourhood qualities study for other suburbs of the Gold Coast should also be undertaken to respond to local aspirations. Alternatively, Council should implement a return of Local Area Plans. <p>Supported. Gold Coast has lost a great deal of its history and should try harder to preserve what is remaining as this adds character</p>

Proposed change	Grounds and recommendations
<p>rail urban renewal overlay map, to avoid duplication with the new Neighbourhood elements overlay. Introduce a ‘traditional residential area’ for a certain part of Southport West, as part of the Neighbourhood elements overlay, acknowledging the predominant architectural style in that area which is to be protected.</p> <p>Additional properties added to the Neighbourhood centre zone at Chirn Park, to reflect recent growth of this centre which is a focal point of the neighbourhood.</p> <p>Introduce a new neighbourhood elements overlay to more closely manage future growth and to assist in creating attractive, leafy and great neighbourhoods of the future.</p> <p>Introduction of an Impact assessment trigger for development within the targeted growth areas (other than a Dwelling house) where exceeding the relevant site cover. This change reinforces the importance of achieving a balance between built form and landscaping as part of future development.</p>	<p>and appeal to the cityscape.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • Other areas of the city with “traditional residential areas” should be given with the opportunity to have this same zoning included in a neighbourhood elements overlay to acknowledge traditional architecture. <p>Supported.</p> <p>This proposed change is supported for the Targeted Growth Area and should be extended to other suburbs in the city. A question still remains: “Who will decide if a development will “create attractive leafy and great neighbourhoods of the future”? This needs to be done by independent and highly qualified urban designers, architects and landscape architects. Planners generally are not trained in aesthetics, environmental performance, building fabric, and environmental comfort for building occupants.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Develop a Gold Coast Design book and an independent review system to ensure its consistent implementation. • Undertake independent review of proposals by expert design review panels (highly qualified urban designers, architects, environmental engineers and landscape architects) to create quality built environments on the Gold Coast. • Use the recommendations from the independent design review panels to better inform the development assessment and approval process by providing authoritative, defensible advice that will deliver better outcomes for the community. <p>These changes are supported in part. The proposed changes to better manage growth include commendable provisions the rest of the city’s population have been asking for quite some years, such as removal of the 50% height exceedance allowance for high rise; provisions for a new neighbourhood elements overlay to create “attractive, leafy and great neighbourhoods in the future”; and the introduction of site cover as a trigger for impact assessment. The question is: “Why are the Targeted Growth Areas favoured in these ways while the rest of the city must wait for future rounds of amendments and perhaps another five years to get these improvements?” There is gross inequity in this proposed amendment. It is simply untenable to afford residents in one area sensible growth management provisions yet deny those provisions to all other areas of the city. The principles of equity and impartiality in the treatment of all stakeholders surely require that these provisions be applied across the whole city. It is noted that in this item the proposal to modify the multiple accommodation development code to improve roof forms of new apartment buildings will apply citywide. It is entirely appropriate the other growth management provisions in item 15 also be applied citywide.</p>

Proposed change	Grounds and recommendations
	<p>A key concern across the city has been the excessive relaxations granted in development approvals in medium and high-density zones that result in overwhelming and intensive development outcomes where site cover and density are not aligned with the Strategic Intent of the Built Form and Urban Design provisions of the City Plan. These relaxations have resulted in: bulky buildings with no deep soil landscaping to support shade trees; little privacy between buildings; blocked views; wind tunnels; reduced fire safety; and side streets full of parked cars. The cumulative effects of such approvals, seen emerging at Palm Beach, is reduced residential amenity, hot treeless streetscapes and a “canyon” effect.</p> <p>The community expects the provisions of City Plan to be followed and upheld by council, and not to be relaxed to such an extent that it is meaningless. The fact that 98% of development approvals are under code assessment, with no opportunity for community input or appeal, is a further indicator that the bar is set too low in our performance-based system. More opportunity for public comment via the impact assessment pathway is needed to improve liveability and amenity outcomes for residents.</p> <p>There is a compelling need to provide adequate multi-dwelling building separation and spacious landscaping across the whole city, not just in the Targeted Growth Areas. The introduction of an impact assessment trigger for development applications across the city (other than a Dwelling house) where site cover guidelines are exceeded would be a particularly effective measure to reinforce the importance of achieving a balance between built form and landscaping. Such a provision will afford the community the right of input on development applications that seek to diminish street amenity and undermine the creation of a vibrant, leafy sub-tropical city. Where triggered it will also help limit outcomes where development approvals are not aligned with the Strategic Intent of the Built Form and Urban Design provisions of the City Plan.</p> <p>Widespread evidence clearly indicates the current City Plan provisions are not delivering the balanced outcomes expected by the wider community (e.g. regular reports and paid advertisements in the Gold Coast Bulletin; appeals such as Komune; many complaints on social media; and the angry dissatisfaction of residents at the Currumbin RSL City Plan meeting 21 January). The amenity and lifestyle impacts of poor design and excessive site cover are being experienced across the city. The current level of assessment to “efficiently and effectively address impacts” is not regulating development to the extent necessary to address those impacts. It is entirely appropriate to raise the level of assessment across the whole city in relation to site cover to provide a more effective solution to impacts, as required under the planning legislation.</p> <p><u>Recommendations:</u></p> <ul style="list-style-type: none"> • For the purposes of equity, planning consistency and effective impact control extend the proposed changes to better manage growth in Targeted Growth Areas across the whole city (includes provisions such as removal of the 50% height exceedance allowance for high rise; a new neighbourhood elements overlay to create “attractive, leafy and great neighbourhoods in the future”; and the introduction of site cover as a trigger for impact assessment). • At a bare minimum introduce an impact assessment trigger for exceeding site cover guidelines across the whole city. This will allow all sectors of the community to have their say on a very important option for improving liveability outcomes under the City Plan. Such a provision will provide the community the right of input to development applications that seek to diminish

Proposed change	Grounds and recommendations
<p>Modifications to the Strategic framework so the 50 per cent building height exceedance test cannot be applied to the targeted growth areas, providing the community with greater certainty regarding expected building height outcomes.</p> <p>Modify the Multiple accommodation development code to improve roof forms of new apartment buildings to achieve greater variation and more attractive buildings. This change will apply citywide.</p>	<p>street amenity and undermine the creation of a vibrant, leafy sub-tropical city. Of all the proposed amendments in round 2 this one will deliver the highest and best outcome in terms of creating the “attractive, leafy and great neighbourhoods of the future”.</p> <p>This proposal is supported in the targeted growth areas and should be expanded to include the whole city as soon as possible. Further, developments need to be assessed against strong policies such as the NSW Apartment Design Guide. Until a similar policy and its associated governance structure (expert review panels) are introduced there is too much room for discretionary relaxations.</p> <p><u>Recommendations:</u></p> <ul style="list-style-type: none"> • Expand this provision citywide. • Height limits need to be specific and enforceable without exceptions. <p>This change is supported. Some additional refinements should be added, as follows.</p> <p><u>Recommendations:</u></p> <ul style="list-style-type: none"> • Regulation of roof forms should avoid focussing alone on ‘roof feature’ requirements and instead also address requirements for small roof terrace areas (to limit noise and overlooking), the amount of shade for terrace users, green roofs, limiting impacts of plant rooms, lift overruns etc. If the quality aesthetics of roof areas are to be assessed the assessment should be by an independent panel of highly qualified architects, urban designers and landscape architects. • Requirements for buildings to be able to provide thermal comfort without reliance on airconditioning would improve the building stock for future resilience.
<p><u>Item 16 - Urban expansion - Upper Coomera investigation area</u></p> <p>Add a new overall outcome for Multiple dwelling development in Courtney West and Courtney South-east to provide better planning guidance for delivery of multiple dwellings.</p> <p>Remove a note that contemplated increased densities where sites are</p>	<p>Courtney Drive is intended for multiple dwellings however it is in an area of quite high biodiversity and the property, especially Courtney West, is bounded by bushland. The current proposed planning requirements do not give enough protection for either the wildlife and bushland or the future human occupants. Building sites need to be much larger than normal residential areas in order to provide fire isolation to buildings but at the same time preserve substantial vegetation and viable habitat.</p> <p><u>Recommendations:</u></p> <ul style="list-style-type: none"> • Given the issues with bushfires in recent months it would be prudent to review the fire risk of this area to determine the advisability of building in the Courtney West area and the availability of safe egress routes. • Other considerations could be reducing the number of dwellings in Courtney West and ensuring that the dwellings meet the highest standards of fire preparedness. • Any push for increased densities should be resisted. <p>Supported.</p>

Proposed change	Grounds and recommendations
<p>amalgamated, as this does not align with the Overall Outcomes.</p>	
<p>Theme 4: Growth and diversification of employment</p>	
<p><u>Item 20 - Neighbourhood centre improvements</u></p> <p>Remove the proposed late-night dining precinct from the neighbourhood centre at Pacific Parade, Currumbin, meaning hours of operation are envisaged to cease at 10pm (consistent with the current City Plan).</p> <p>Modify the Chevron Island Late night dining sub-precinct to include the properties at 7-9 Burra Street, Chevron Island.</p> <p>Amend the catchment size for suburban neighbourhoods to a 1500 metre walk.</p>	<p>Supported, though it is recognised that superseded planning rights will remain for 12months following adoption of these amendments.</p> <p>Supported.</p> <p>Supported.</p>
<p>Theme 5: Environmental mapping</p>	
<p><u>Item 22 - Environmental mapping</u></p> <p>Update the Environmental significance – vegetation management overlay map to incorporate more up-to-date State Government mapping and local vegetation data (i.e. 2017 data compared to 2013 data).</p> <p>Amend the Critical corridor mapping within the Environmental significance - biodiversity areas overlay map to include vegetation located within road</p>	<p>Supported.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • Provide specific reference to updates to include koala habitat mapping provided by the State Government. <p>Supported.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • Assessment and reporting should be undertaken on a progressive basis of what vegetation is actually in these casements.

Proposed change	Grounds and recommendations
<p>casements (road reserves) and waterway casements where required to maintain connectivity and include significant biodiversity values.</p> <p>Address site specific requests for inclusion or removal from the Biodiversity area mapping.</p>	<p>This change is opposed. There are no specific sites referred to here and no criteria for such applications. This provision could open the door to progressive incursions into areas protected for their biodiversity values. This change would introduce yet more opportunities for development applications to erode the biodiversity values supposedly protected under the City Plan.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • Do not include this amendment.
<p>Item 23 - Rural and rural residential landscape and environment precinct</p> <p>Amend the Landscape and environmental precinct mapping in both the Rural and Rural residential zones to reflect more up-to-date vegetation data.</p>	<p>Supported.</p>
<p>Theme 6: Other land use changes and alignment improvements</p>	
<p>Item 26 - Community infrastructure - Interface areas</p> <p>Include waste recycling and waste transfer stations in the Industry, community infrastructure, agricultural land interface area (ICIALIA) overlay code, resulting in a 250m buffer area.</p>	<p>Supported as a protection of essential community infrastructure.</p>
<p>Please add short additional comments here to personalise your submission (for example, concerns with a particular planning or development issue in your neighbourhood):</p>	

Proposed change	Grounds and recommendations

Email your submission to CityPlanSubmissions@goldcoast.qld.gov.au by 5.00pm 12 February 2020 as an attachment. There is no need to insert a signature if you use this method. Remember to request an acknowledgement of receipt.