

29th October 2019

Mr Dale Dickson
Chief Executive Officer City of Gold Coast
PO Box 5042, Gold Coast MC QLD 9726
CityPlanSubmissions@goldcoast.qld.gov.au

Attention Planning Department

Dear Mr Dickson.

Re: Submission City of Gold Coast Council – City Plan Amendments 2 and 3, 2019.

[https://www.gchaveyoursay.com.au/ourcityourplan?utm_source=digitalbanners&utm_medium=display&utm_campaign=cityplan&utm_content=corporatewebsite.](https://www.gchaveyoursay.com.au/ourcityourplan?utm_source=digitalbanners&utm_medium=display&utm_campaign=cityplan&utm_content=corporatewebsite)

Introduction: While some of the proposed amendments are supported in full or in part, Gecko Environment Council Association Inc remains concerned that the assessment process using the City Plan guidelines is extremely flexible and subjective, resulting in the lack of certainty for residents in what their neighbourhood, community or city will look like and what it will be like to live in. The objective of a vision for the city as a sustainable, liveable city with sound community amenity and protection of important native flora and fauna has been lost to the overriding imperative of building for population growth. While it is accepted that the population will continue to grow and change is inevitable, the issue of quality in the built environment is not considered adequately in the push for quantity. Residents of the Gold Coast are justly concerned that they have little control over the massive changes being proposed for their city in the constant rafts of amendments. While planners like to talk of the City Plan as a living document, such a concept is poorly understood by those that have to cope with the change and the level of anxiety at constant rapid change is rising and being expressed in both anger and apathy, which is not a good outcome for a healthy democracy. Council needs to do a great deal more in engaging the population of Gold Coast City in understanding how the city will change, what efforts are being made to ensure quality of life and protection of the natural environment and what part they can play in having a say in these changes. At present the city appears to change simply on the say so of a series of developers demanding more height and density than the city plan provides, with no consideration of the cumulative impact of individual approvals. The situation of having 98 % of all applications code assessed is simply unacceptable, especially when a majority of those result in relaxations of the guideline of the city plan. It is no surprise that residents wonder why we have a city plan at all.

Themes 1 to 6	Items 1 to 34	Current City Plan 2016	Proposed change	Comments
Theme ONE Height and Density	General comment			There are constant references to stakeholder feedback with no information as to who these stakeholders were or what their stake in the height and density changes in the city plan

				related to. To the best of our knowledge the general community was not invited to give any feedback during a public consultation process on height or density.
	Item 1 & 2 Building height overlay map and new building height categories	Building applications are being approved which do not follow the guidelines of the City Plan, particularly in regard to: Density ; Height ; Setbacks; Site cover; Communal space; on-site car parking.		The result of relaxations of the Performance Outcomes and Acceptable Outcomes has been the construction of medium and high density buildings that crowd their sites and infringe on the privacy of their neighbours while reducing air flow and visual amenity. This is particularly true of the beach side suburbs where the final outcome is likely to be an unattractive canyon of tall buildings either side of the Gold Coast Highway. The city image is not just made up of tall buildings, but also of the street scapes where people actually live and move. This issue appears to have been forgotten in enabling streets of high rise blocking ocean and other views. <u>Recommendation:</u> 1. That density, setbacks, and site cover are triggers for impact assessment as well as height. 2. That decent setbacks from boundaries at a scale proportionate to the height and bulk of the building from boundaries are enforced to ensure the privacy of neighbours and physical and visual amenity. Refer also to comments in Items 9 and 11.
	Item 1 & 2	Building heights, where indicated are shown as storeys and metres	Defining building height in metres only , removing references to storeys (except for The Spit master plan area)	The average person will find it difficult to relate to building heights in terms of metres and there should be a transition period of at least 2 years, during which both metres and storeys are used. It can already be seen that developers will divide the height by 3m to determine how many residential storeys they can squeeze into the allowable height. This reduces the flexibility of the use of the buildings over their lifetime. If the building heights are to be expressed only in metres then there must be accompanying rules to generous floor heights close to street level (say 5m minimum) to allow for a variety of uses. <u>Recommendation:</u> that both metres and storeys is retained to improve resident understanding and to ensure that sustainable, multiple use buildings with a generous street level storey height are approved.
	Item 1 & 2		7 building height categories “expanding the current three building height categories (low,	Overall this change is supported if it is accompanied by visual representations and information of both height in metres and storeys is provided.

			medium, and high) to seven, including Low, Low-medium, Medium, Medium-high, High, Tall and Supertall”	<u>Recommendation:</u> That the 7 height categories are adopted and that visual representation of these with accompanying information regarding metres and storeys is available to the public and included in DA assessments.
	Item 1 & 2	Building heights are shown for most of the city but not for open space, reserves and for low residential areas.	Colour coding the new building height categories on the building height overlay map to visually represent the height policy across the City.	This is a positive change making it easier for residents to identify where buildings of different heights are likely to be located. It is also appreciated that there has been an overall downsizing of heights in low and low to medium zones which will improve residents’ confidence in the city plan to some extent. One exception that Gecko is aware of is the Neighbourhood zone in Pacific Pde Currumbin is inexplicably retained as 15 m. Retention of 15 m instead of downsizing to 11.5 or 12m has already resulted in a developer attempting to get 6 storeys in a 3 storey zone. This area should be consistent with the immediate dwellings, southern Palm Beach and northern Tugun neighbouring suburbs. <u>Recommendation:</u> 1. That the height for Pacific Pde, Currumbin is reduced from 15m to 11.5m to be consistent with surrounding areas. 2. That heights for buildings in open space, reserves and parklands are shown on the maps. 3. That colour coding is adopted.
	Item 1 & 2	In certain zones it is allowable to apply for 50% increase in building height above the specified number of storeys, provided merit and compliance with acceptable solutions (site cover, setback etc) is achieved.	50% bonus height: The proposed zone of low- medium density does not contemplate increases in building height above those shown on the Building Height overlay map, providing greater clarity to the community and industry about the scale and intensity of future development intended for these areas. The ability to exceed the mapped height will not apply in this zone, as opposed to the Medium and High-density residential zones which allow increases in some instances.	It is of great concern that there is no intention to remove the 50% bonus of height from any category of density except low and low-medium density. What is the justification for retaining this? This bonus provision has been abused in recent years, with the extra height being approved without any commensurate community benefit. This has resulted in high levels of dissatisfaction and resentment in the community as the appearance and amenity of their suburb has been changed well beyond that expected from reading the City Plan version 7. There is no definition of what constitutes “allow increases in some instances”. Does this constitute a continuation of what appears to be the current free-for-all? The introduction of the 7 height zones should render this bonus unnecessary. Its removal will improve community confidence that the City Plan is being adhered to. <u>Recommendation:</u> That the 50% height bonus be removed altogether from the City Plan altogether.

	Item 3 New Low-medium density residential zone	Not applicable	<p>A new Low-medium residential density zone is proposed. This new zone will be introduced into some areas currently zoned Low density residential or Medium density residential. The zone provides an appropriate transition and creates opportunities to support the 'missing middle' as identified in Shaping SEQ, such as dwelling houses, duplexes, soho housing, terrace housing, townhouses and apartments. The proposed zone does not contemplate increases in building height above those shown on the Building Height overlay map, providing greater clarity to the community and industry about the scale and intensity of future development intended for these areas. The ability to exceed the mapped height will not apply in this zone, as opposed to the Medium and High density residential zones which allow increases in some instances.</p>	<p>(3) The addition of low-medium residential zone is a positive step to providing a greater range of housing options to meet the growth projections of the SEQRP, such as duplex, townhouses, lower rise apartments. This new category may provide more choice of housing, but the emphasis needs to be on quality and not simply quantity throughout the city. The northern growth areas of the city, such as Coomera, have become an endless vista of unimaginative houses with little street-scaping, few footpaths, fewer bikeways and inadequate parks and other community facilities. There is no attempt to retain natural bushland or to have corridors of bushland between development subdivision estates. The entire emphasis appears to be on maximum yield and profit for the developer and little consideration of the cumulative impact, aesthetics and health of the residents is in evidence. Recommendation: That proponents of new subdivisions and areas designated for low- medium density be required to undertake social and health impact assessment to ensure that they provide for communal space, community interaction, safe active transport options and cumulative impact.</p>
Theme TWO Built form and urban design				
	Item 8 Community Benefit Bonus Elements Removal	<p>Part 6 Zones 6.2.3 High density residential zone code 6.2.4 Centre zone code 6.2.5 Neighbourhood centre zone code</p>	<p>A review of the City Plan policy – Community benefit bonus elements was undertaken in response to internal and external stakeholder feedback regarding its application, effectiveness and low take-up rate. This review found that the current</p>	<p>There is no information about who the internal and external stakeholders were that provided feedback to council planning officers about this matter. The public were never consulted. The current community benefits policy was designed to gain better sustainability outcomes and community benefits for the city via the carrot of higher density (a maximum of an extra 40% density) for a development application. However, the</p>

		<p>6.2.6 Sport and recreation zone code 6.2.17 Innovation zone code 6.2.19 Mixed use zone code Part 9 Development codes 9.3.10 High-rise accommodation design code 9.4.4 General development provisions code Schedule 6 City Plan policies SC6.1 City Plan policy index SC6.5 City Plan policy – Community benefit bonus elements (new) Schedule 2 Mapping</p>	<p>policy is not delivering the intended outcomes as originally drafted. City Plan will be amended to remove the existing policy from City Plan.</p>	<p>industry has never needed to earn extra density (therefore profitable yield) since it is all too easily given for free by council assessors based on the dubious and non-rigorous assessment of merit.</p> <p>The community benefit policy should continue and be enforced to ensure developers “earn” extra density or other relaxations. There is need in the community for improved amenities and if a developer receives a personal benefit from a relaxation then he/ she should be required to ensure the community also benefits.</p> <p><u>Recommendation:</u> That the community benefit bonus is retained and enforced.</p>
	<p>Item 9 Built Form Improvements</p>	<p>Part 3 Strategic framework Part 6 Zones (all) Part 8 Overlays 8.2.12 Light rail urban renewal area overlay code Part 9 Development codes 9.3.4 Commercial design code 9.3.10 High-rise accommodation design code</p>	<p>introduction of a new theme and element within the Strategic framework to consolidate the key design requirements; updates to zone codes to reflect the key design principles, and clarify desired built form and urban design outcomes; a new suite of setback and site cover provisions in the Low-medium, Medium and High density residential zones; incorporating additional design elements into the relevant City Plan codes; and</p>	<p>The introduction of the 6 design principles is welcomed with the additional detail made available in regard to Place Context, Site Analysis and Design Response. It is unclear in the descriptions of 3.4.2.1 that these principles apply to all buildings and not just the light rail urban renewal overlay areas. However in none of this wording is there mention of responsiveness to climate change risks or increased sustainability of construction materials and functioning of the final building / development. Even the section on Subtropical is all about architectural design, which may or may not be responsive to climate change impacts.</p> <p>There is a high degree of subjectivity in the description of the principles which do not give certainty that they would be considered by the P and E Court as legitimate criteria for DA assessment (approvals or refusals).</p>

		9.3.14 Multiple accommodation design code 9.4.4 General development provisions code 9.4.8 Reconfiguring a lot code Schedule 1 Definitions SC1.2 Administrative definitions Schedule 6 City Plan policies SC6.1 City Plan policy index SC6.12 City Plan policy – Site context and urban design (new)	incorporating a Site context and urban design policy in Schedule 6 of City Plan.	The strengthening of setbacks and site cover is an improvement as long as they are adhered to. There has been an abuse of the current city plan requirements in setbacks and site cover and it is not evident how this ongoing abuse will not continue even with improvements. The design principles and the SCUD Site Context and Urban Design Policy are commended as one way of improving the liveability of buildings within the context of the neighbourhood and perhaps consideration of cumulative impact The improvements in quality of design are welcomed, but there is no indication of who will judge the aesthetic or design merit of these buildings. Planning officers are not trained in this field and there are only 2 or 3 architects in the Office of City Architect, so who will be the judge? Recommendations: 1. That the 6 design principles are required to be applied to all construction and that SCUD becomes a formal assessment tool to reduce subjectivity of judgement of applications. 2. That designing and construction in response to climate change is incorporated into the principles. 3. That sustainability in design and construction above the 6 star level is encouraged. 4. That planning staff are trained in the objective assessment of the application of the 6 design principles.
	Item 10 Changes to private and communal open space	Part 9 Development codes 9.3.10 High rise accommodation design code 9.3.14 Multiple accommodation code Schedule 1 Definitions SC 1.2 Administrative definitions	the introduction of a new administrative definition for communal space reducing the amount of communal space required in the High-rise accommodation design code and Multiple accommodation code to 6.5m2 per dwelling, which reflects contemporary practices only requiring communal open space when there are ten or more townhouses The proposed changes to private open space provisions, include:	The increase in private space on balconies is accepted as being desirable to improve liveability of high rise building units. However it is not acceptable to reduce communal open space by almost half as has been the practice over the past few years. In order to develop some degree of a sense of community and reduce social isolation in high rise buildings the communal open space component is important and should have suitable facilities to promote interaction between residents. Reduction of communal areas appears to be simply to improve the profits of the developer with little thought for the long term health and welfare of the residents. The High Rise accommodation design code PO11 and AO11.1-3 criteria must be retained.

			<p>the introduction of a new administrative definition for private open space increasing in the amount of private open space required in the Multiple and High-rise accommodation codes to ensure more usable space is provided</p>	<p>Equally it is totally unacceptable to reduce to zero the communal open space for less than 10 town houses. As the city density increases these townhouses will house families with children. Failure to provide communal open space will send children out into the street to find a place to play or simply lead to children living sedentary, indoor lifestyles. Having no place to engage with neighbours is against all social policy for a healthy population. Research literature abounds with confirmation that communal space is essential to health lifestyles in multiple dwellings. Practical examples can be observed in Singapore, where it is a requirement of all multiple dwelling buildings.</p> <p><u>Recommendations:</u> 1. That the full extent of communal space is retained in medium and high density buildings. 2. That Council's own Social and Health Impact Assessment policy is applied to all multiple dwellings.</p>
	<p>Item 11 Existing Light Rail Urban renewal overlay review</p>	<p>Part 1 About the City Plan Part 3 Strategic framework Part 8 Overlays 8.2.12 Light rail urban renewal area overlay code Schedule 2 Mapping</p>	<p>The key improvements include: developing an urban ground design guideline requiring these areas to reflect the key design principles to clarify design outcomes expected better distinguishing between the different areas by including a 'secondary focus area' including setbacks and site cover performance outcomes and acceptable outcomes specific to areas within the Light rail urban renewal area</p>	<p>The Strategic Framework map chart is so small it is unreadable. However it appears that council planners have finally heard and are attempting to respond to the increasing loud calls of outrage from the community about the failure of planners to uphold planning scheme guidelines in relations to height, density, setbacks etc in the high rise development along the GC Highway at Palm Beach resulting in bulky buildings taking up most of the site and being far too close to neighbours and street frontages. Hopefully the institution of the design principles and improvements in setbacks and site cover will save the community amenity from Broadbeach to the airport from a repeat of Palm Beach. As the changes to the Strategic Framework will again only be guidelines there is still no certainty that these will be applied along the Light rail urban renewal route. A degree of prescription is needed here to give the community some confidence in decision making of buildings along the route.</p> <p><u>Recommendations:</u> A review of the need for high rise development the length of the light rail renewal overlay area is needed in order to protect and preserve community amenity and liveability. For example, All buildings in the Secondary Focus Area, Frame and Transition Zone, and ALL</p>

				<p>buildings NOT directly sharing a boundary with the L R track corridor should be setback from the street a minimum of 6m. In the future, when the population and economy can support retail and commercial infill at ground level, these developments would sit in a landscaped setback adding visual and environmental amenity to the city.</p> <p>Increased prescription is needed within the guidelines to ensure they are adhered to.</p> <p>Car Parking areas for high rise buildings should revert to being located underground to facilitate the visual and social amenity of a neighbourhood. Transition and frame areas must mandate NO podium development.</p>
	<p>Item 12 transport code changes</p>	<p>Part 9 Development codes 9.4.8 Reconfiguring a lot code 9.4.13 Transport code</p>	<p>The proposed improvements to the Transport code and the Reconfiguring a lot code include: General workability updates and drafting improvements Conflicting provisions relating to the access of visitor parking Strengthen Traffic Impact Assessment (TIA) provisions Accessing the site in a forward gear for Dwelling houses, Dual occupancy and Multiple dwellings Car parking rates for various land uses Visitor bicycle parking rates Only part of the Pacific Fair site is identified in Figure 9.4.13-1: Transport hub area Strengthen transport provisions for subdivision</p>	<p>It is impossible to read the graphic provided so it is difficult to make an informed comment. It is a given that better public and active transport is needed.</p> <p><u>Recommendations:</u></p> <ol style="list-style-type: none"> 1. Adherence to 9.4.13.2 (2) (b) of the Purpose of the Transport Code and 2. 2. more efficient east west public transport links 3. Vastly improved public transport is required for the northern growth area which is almost entirely car dependent 4. Responsive and timely provision of additional public transport as growth progresses 5. Safe off road bikeways for commuting riders throughout the city, especially linking to school zones 6. Shaded walking pathways as the temperatures rise.

<p>Theme THREE Targeted growth areas</p>	<p>Item 15 Identified growth areas</p>	<p>Schedule 2 Mapping</p>	<p>To address this dwelling shortfall, the City has identified three priority areas for growth at Biggera Waters, Labrador and Southport West to accommodate the next five years of growth. These areas already have the existing transport, community facilities, services and infrastructure to support further intensification. Proposed changes to zoning, height and density provisions have been made to further encourage growth in these areas. The diversification of dwelling choice in the identified priority growth areas will also be supported by the introduction of the new Low-medium residential density zone.</p>	<p>While the choice of these three areas for increased density might be logical, it is unfair to current residents that this decision was made with no notice or local consultation. There is no protection for character or heritage buildings and places through such broad scale changes to height and density. While some might see this an opportunity to cash in on their investment in a dwelling house, many others will be rightly concerned about the impact of medium density buildings in low-rise residential areas. These impacts include, loss of house value, loss of privacy, loss of sunlight and loss of visual amenity. They have the example of Palm Beach to justify their fears.</p> <p>There are certainly community facilities and transport in this area, but is the infrastructure sufficient to cope with the expected population increases? The increase in traffic congestion, which is already an issue in this area, will be substantial. Greater competition for parking spaces will also impact on residents.</p> <p>It is also unfortunate that the highest buildings are once again along the foreshore of the Broadwater, so shutting out the views and breezes from the lower rise dwellings to the west. People in a high rise get a view from their height and do not need to be front row to the Broadwater.</p> <p><u>Recommendation:</u> That these changes are not incorporated into the city plan amendments without substantial community consultation over and above the current amendments round. That an assessment of community needs in the event of the changes is undertaken and provision made for additional facilities so identified.</p>
	<p>Item 16 Urban expansion – Upper Coomera investigation area</p>	<p>Part 3 Strategic framework Part 6 Zones 6.2.16 Emerging community zone code Schedule 2 Mapping</p>	<p>In consultation with property owners, the Upper Coomera Investigation area of Courtney Drive has now been appropriately planned to accommodate a new community which balances residential opportunities with planning for recreation open space and wildlife.</p>	<p>This area should be removed from a designation of investigation area and not proceed to an emerging community status. It is a contradiction to speak of increasing density and protecting Yaun Creek through a restoration of the creek. The protection of biodiversity along creeks and other wildlife corridors is already extremely difficult and unlikely when surrounded by urban development. The area is a known koala habitat, a species under major threat of extinction</p>

			<p>The planning for this Investigation area has examined where the best locations are for different intensities of housing and how to restore a wildlife corridor along Yaun Creek.</p>	<p>within 5 years on the Gold Coast unless drastic action is taken. As the Koala Conservation Strategy mapping is not included in the amendments mapping it is necessary to apply the precautionary principle here and not enable urban development in this area until such mapping is available as well as the recommendation and regulatory framework that will emerge following public consultation for and finalisation of the Draft Koala Management Plan. This amendment should be considered at some future date when the Koala Management Plan is available.</p> <p>Of equal concern is the section Courtney West (CW) with fingers of future development reaching into the bush covered hills, not only as a threat to biodiversity, but also putting future residents in the path of dangerous bushfires as our climate dries. Surely this is unnecessary and the west boundary must be Courtney Drive minor and not the bush fire hazard zone line. The potential additional burden that might be faced by our Emergency Services, especially volunteer rural brigades, with the introduction of yet more intensive development into bushland must be considered here.</p> <p><u>Recommendation:</u> (1) Remove Upper Coomera investigation area from the city plan in the same manner and for much the same reasons as Gilston and Mudgeeraba. (2) If it proceeds limit the extension to Courtney Drive minor and remove CW from the area and map. (3) Increase the riparian zone along Yaun Creek to 100 metres to provide wildlife with some chance of surviving urban development.</p>
	Item 17 deletion of investigation areas	Schedule 2 Mapping	<p>It has been determined that Mudgeeraba (Bonogin Road), Gilston (Pyrus Court) and Carrara (Whitian Drive) have limited ability for any significant development due to constraints such as inadequate developable land, flooding issues and existing development, these areas</p>	<p>The deletion of these areas from further significant development is fully supported. The Mudgeeraba and Gilston areas should remain semi-rural, while Carrara is a known flood area and removal is consistent with the TLPI for floodplains in the city.</p> <p>However It is alarming to see the entire area of cane lands, north of Pimpama, are designated as Investigation area. This area will be subjected to sea level rise as climate change proceeds and to consider an endless expanse of low- medium</p>

			<p>should no longer be considered as investigation areas.</p> <p>The removal of these areas from Strategic framework map 1 will ensure that these locations will maintain their unique local character.</p>	<p>density in the area does not demonstrate responsible planning. The impacts of climate change on the city are not considered adequately anywhere in the City Plan despite the declaration in the most recent report from the Intergovernmental Panel on Climate Change, that the Gold Coast has been identified as the most vulnerable place in Australia to sea-level rise. This deficiency in planning is in part attributable to a failure by successive Councils to update the City's Climate Change Policy prior to its lapse in 2014.</p> <p><u>Recommendation:</u> 1. That the northern expanse of investigation area is removed from city plan maps, that climate change impacts on city residents are researched and appropriate planning guidelines are included in the City Plan. 2. That the Council immediately commences consultation to develop a contemporary and best practice climate change policy beyond the review of energy efficiency and disaster management that appears to be Council's focus in terms of policy to guide the development of the City.</p>
Theme FOUR Growth and Diversification of employment	Item 18		<p>Reduce industrial land use from Impact to code assessment to facilitate investment</p>	<p>This change is opposed as once again it locks residents out of the assessment process with no ability to make formal objections or possible legal challenges to approvals. It is considered unlikely that moving from code to impact assessment will greatly enhance the likelihood of investment and no evidence is provided to justify this proposal.</p> <p><u>Recommendation:</u> That impact assessment of industrial land use remains.</p>
	Item 20		<p>An alternate measure to calculate the size of a neighbourhood centre in low residential areas.</p> <p>Extended hours of trading past 10pm.</p>	<p>The reader was unable to determine where to find information on what this alternate measure is. A clear description of the alternate measure needs to be included in Item 20.</p> <p><u>Recommendation:</u> 1. That a clear description or definition of the alternate measure to calculate the size of a neighbourhood in low residential areas is provided in an easily accessible form. 2. The extension of trading hours in neighbourhood areas should not be a blanket extension. It should be considered on a case by case basis. 3. That the impact on neighbouring residential dwellings further away than next door is considered. 4. That extensions of trading</p>

				hours are by impact assessment to provide residents likely to be impacted by noise or nuisance with the right to lodge objections.
Theme FIVE Environment	Item 22 – Environmental significance vegetation	Schedule 2 Mapping Schedule 6 SC6.7 Ecological site assessments	Amended to reflect updated mapping and on-ground conditions to the greatest extent possible Categories of vegetation were also reviewed and amended	<p>As an overall comment on the mapping Gecko requests that Council updates the Vegetation Mapping so that it reflects the most up to date information. It is our understanding the Vegetation Mapping dates back to 2013 and does not reflect the current situation. While other databases from State and federal level may be referenced additionally in development applications, Gecko questions how this outdated data in Council mapping can be properly used to make final planning decisions, especially where locally significant species may be present</p> <p>This mapping does not include the Koala Conservation Strategy Mapping, which is more recent than the 2016 mapping used here. While the mapping may reflect the current situation which is one of reducing native vegetation due to development, the codes do not provide any additional protection of such habitat.</p> <p>It is confusing to see areas such as Burleigh Heads National Park and Nerang National Park not considered as regulated vegetation and instead is designated as general priority and therefore subject to removal. The maps should at least demonstrate that this is State Government regulated.</p> <p>Gecko is not familiar with all areas of the city, but have identified an error in the map for Currumbin Estuary as much of Beree Badalla Reserve is incorrectly mapped as Lion Park. It appears that all dunal vegetation is categorised as general and can be removed which is contrary to the purpose of dunal vegetation, which is to protect the land behind the dunes and provide some small amount of habitat.</p> <p>Narrowneck Littoral Rainforest, which is almost the last vegetation of this type in the city is mapped as medium which is an upgrade from general, but still is not protected from removal. A recent attempt by Surfers Paradise SLSC to build a club house on this rainforest demonstrates how vulnerable this vegetation is and it should be listed as high priority.</p>

				<p>Whole of the Spit – Philip Park and Federation Walk is categorised as general vegetation and can be removed, which is highly unsatisfactory.</p> <p>South Stradbroke Island – very little is regulated vegetation, most is general.</p> <p>Coomera Wetlands appear to have been upgraded to medium which provides for offsets in the event of removal of vegetation. It is difficult to imagine where such offsets could be found within the city.</p> <p><u>Recommendations:</u> 1. That the mapping is updated with the Koala Management Strategy mapping as soon as it becomes available. 2. State Government protected land is designated as such. 3. The map for Currumbin Estuary is corrected to show the full extent of Beree Badalla Reserve and Fish Habitat. 4. That the littoral rainforest remnant on Narrowneck is upgraded from medium to high priority given its rarity and vulnerability. 5. The vegetation in the reserves on The Spit should be designated as medium and in parts high priority.</p>
	Environmental significance biodiversity	Schedule 2 Mapping Schedule 6 SC6.7 Ecological site assessments	<p>Changes proposed: updated mapping and on-ground conditions to the greatest extent possible</p> <p>Categories of vegetation were also reviewed and amended The changes will better protect environmentally significant wildlife corridors based on latest mapping technology and information. These updates have been informed by the Critical Corridor and Substantial Remnant Mapping 2016 report.</p> <p>Applying latest scientific data has resulted in the Biodiversity corridors being remapped to reduce conflicts within the Urban Footprint, while also ensuring environmental values are well protected across the city.</p>	<p>This mapping does not include the Koala Conservation Strategy Mapping, which is more recent than the 2016 mapping used here.</p> <p>It is recognised that there is a crisis in biodiversity that is world-wide and which applies equally to the Gold Coast, which is known as a biodiversity hotspot and worthy of the highest level of protection. It would be pleasing to see the Gold Coast taking more proactive measures to better protect our biodiversity both within and outside of the Urban Footprint. It is many years since the vegetation management local law was reviewed and put out for consultation and this is long overdue.</p> <p><u>Recommendation:</u> 1. That the mapping is updated with the Koala Management Strategy mapping as soon as it becomes available. 2. That Council undertaken a community engagement program with the objective of improving understanding of and protection of biodiversity in the city.</p>

	Hinterland to coast critical corridors	Schedule 2 Mapping Schedule 6 SC6.7 Ecological site assessments	No information provided on the changes made.	Definitions of the values of mapped area vegetation and their status in DA assessment are not specified. Community education and discussion is really needed on the value of these corridors not only to the fauna, but also to humans. The need for human contact with nature, in a manner that does not degrade the natural areas, is well documented and should be provided in areas of low conservation value and not in conservation reserves. <u>Recommendation:</u> That the values of the mapped areas of vegetation along the critical corridors and their status are specified in DA assessment processes.
	Item 23 Rural and rural residential landscape and environmental precinct	Schedule 2 Mapping	The proposed changes include: refinement to mapped extent of the Landscape and environment precinct to delineate between rural activity areas and areas where environmental and/or landscape values exist in the Rural zone refinement to mapped extent of the Landscape and environment precinct to delineate between rural residential areas and areas where environmental and/or landscape values exist in the Rural residential zone	There is little detail provided here, however it appears that the refinement of mapping that more adequately delineates boundaries between environmental and landscape values and rural and rural residential zones is an improvement to protecting the natural environment. <u>Recommendation:</u> these changes are supported.
	Item 24 Healthy waterways code	Part 5 Tables of assessment Part 5.8 Categories of development and assessment – Operational work Part 9 Development codes	Improvements to the Healthy waters code include: <ul style="list-style-type: none"> • applying to Operational Works (OPW) applications (vegetation clearing, change to ground level and infrastructure works) to ensure stormwater is managed during the 	(24) The proposed changes in the code are supported as methods of better protecting waterways especially in regard to sedimentation controls. There is a need for wider riparian vegetation corridors to improve this and enhance biodiversity protection and connectivity. <u>Recommendation:</u> That these changes are supported and that riparian widths are reviewed with a view to making them wider with a minimum of 50 m wide.

		9.4.5 Healthy waters code	<p>construction phase of development</p> <ul style="list-style-type: none"> improving alignment of assessment benchmarks for wastewater management, lawful point of discharge and overland flow paths <p>including a provision for overland flow paths to address sites which do not trigger the City Plan – Flood overlay code</p> <ul style="list-style-type: none"> including new provisions to avoid or minimise the release and mobilisation of nutrients and sediment <p>including the following criteria in the code:</p> <ul style="list-style-type: none"> whole of life infrastructure cost; public safety; maintenance access; fauna movement; and dewatering management. <p>addressing inconsistencies between the SC6.9 City Plan Policy - Land development guidelines and the Healthy waters code (e.g. inclusion of stormwater quantity management requirements)</p> <p>refining the erosion and sediment control and stormwater quality policies to provide greater clarity</p>	
Theme 6 Other land use changes				

	<p>Item 25 Community Infrastructure – improving alignment</p>	<p>Part 5 Tables of assessment Part 5.5 Categories of development and assessment – Material change of use</p>	<p>The proposed changes include reducing the level of assessment from: Impact assessment to Accepted subject to requirements for Caretaker’s accommodation in the Conservation zone and Township zone – Large lot precinct Code assessment to Accepted for Emergency Services if not within 50m of a sensitive land use in specific zones across the city Impact assessment to Accepted for Emergency Services in specific zones across the city Impact assessment to Accepted for Park in the Low-density residential zone – Large lot precinct and Township zone – Large lot precinct Impact assessment to Accepted for Substation in the Low-density residential zone – Large lot precinct.</p>	<p>The change from impact assessment to Accepted is strongly opposed for caretaker accommodation in Conservation zones. The importance of conservation zones cannot be understated in a city with such a high growth rate of population and the additional protection of impact assessment is necessary. It may be unlikely that a caretaker dwelling can be expanded to become a resort, but it is possible and can best be avoided by retaining impact assessment. <u>Recommendation:</u> That caretaker dwellings in conservation zones remain impact assessment.</p>
	<p>Item 28 Rural Amenity</p>	<p>Part 5 Tables of assessment Part 5.5 Categories of development and assessment – Material change of use Part 6 Zones 6.2.20 Rural zone code 6.2.21 Rural residential zone code</p>	<p>To protect rural and rural residential amenity, we are proposing a more rigorous approval process for transport depots that park multiple large trucks on their properties in Rural and Rural residential zones. It is proposed that a Transport depot in these zones will require an impact assessment before they can go ahead.</p>	<p>The change of assessment from code to impact assessment in regard to transport depots in rural zones is supported. It is inappropriate that the quiet enjoyment of rural living should be compromised by the daily use of rural roads for large noisy and polluting trucks. <u>Recommendation:</u> That the assessment for transport depots in rural zones be made impact assessable and that appropriate guidelines are developed relevant to appropriate places for such depots to provide some certainty to rural residents</p>
	<p>Item 29 Retirement facilities</p>	<p>Part 5 Tables of assessment Part 5.5 Categories of development and</p>	<p>To further support the establishment of Residential care facilities and Retirement facilities in the right locations, the following is proposed:</p>	<p>Changing assessment of aged care facilities from impact assessment to code assessment is strongly opposed. There have been instances of development of a residential facility with a minimum of aged care facilities (less than 1/4 of</p>

		assessment – Material change of use	<p>Reducing the category of development and level of assessment for a Residential care facility in the Community facilities zone from impact assessment to code assessment.</p> <p>Allowing existing retirement buildings to be repurposed as either a Retirement facility or Residential care facility land uses in all zones, where they are currently code assessment.</p>	<p>the units) on a golf course. This was approved, despite very strong community opposition, because Council decided it was providing a service for aged people to remain in their community. There was no guarantee that local aged people purchased these units. The number of aged care units was so minimal that it was obvious this was screen for a residential development on a golf course in opposition to Council policy in keeping golf courses as open space. While it is desirable to allow people to age within their communities where they have friends and supports it is also essential that existing residents have the right of objection to proposed aged care developments.</p> <p><u>Recommendation:</u> That aged care facilities remain impact assessment.</p>
	Item 31 Tables of Assessment	<p>Part 5 Tables of assessment</p> <p>Part 5.5 Categories of development and assessment – Material change of use</p>	<p>To improve clarity within City Plan; and provide consistency for the development industry and community as to what land uses are contemplated within each zone it is proposed to remove all land uses listed as impact assessment in the categories of development and assessment tables in all zones. This will acknowledge that any land use not list as ‘accepted’, ‘accepted, subject to requirements’, or ‘code’ assessment will default to impact assessment.</p> <p>What is changing? The removal of land uses listed as impact assessment in the categories of development and assessment tables in all zones.</p>	<p>This could lead to some confusion for the average person checking on the assessment level of a parcel of land.</p> <p><u>Recommendation:</u> retain the current status of impact assessment in categories of development and assessment tables in all zones.</p>
	Item 34 Alignment with Spit Master Plan	Part 1 About the City Plan	A new height sensitive area has been identified on the Building height overlay map to cover The Spit. Development, involving building	The inclusion of this height sensitive area for the Spit in the Building Height overlay to support the Spit Master Plan is fully endorsed.

		<p>Part 3 Strategic framework Part 5 Tables of assessment Part 5.10 Categories of development and assessment – Overlays Part 8 Overlays 8.1 Preliminary 8.2.16 The Spit Master Plan height sensitive area – building height overlay code (new) Schedule 2 Mapping Strategic framework map 4 – Greenspace network Building height overlay map</p>	<p>work, in this height sensitive area will be assessed against a new The Spit Master Plan height sensitive area – building height overlay code. Amendments to the Strategic Framework have also been proposed to recognise the recently adopted The Spit Master Plan and to support policy changes introduced by the new height sensitive area.</p>	<p>However there are no height limits for the parks and reserves on The Spit e.g. Federation Walk, Doug Jennings Park, Philip Park or Hollingdale Park and various buildings are proposed for these areas e.g café, resilience centre and perhaps a cruise ship terminal. Height limits are needed for all these constructions. <u>Recommendation:</u> That height limits of 1 storey, 7.5 m is made for all reserve and parkland areas of The Spit Master Plan area.</p> <p>Gecko notes that the light rail is still included for possible future construction on The Spit despite strong community objections and expressed wishes for a bus service looping from the entrance to The Spit to the Seaway. <u>Recommendation:</u> That the light rail planned for the Spit is removed from the City Plan and the Transport Strategy and is replaced with an electric bus service loop the length of The Spit.</p>
--	--	--	--	--

Signed:

Lois Levy OAM.



Campaign Coordinator.

Gecko Environment Council Association Inc.

139 Duringan St, Currumbin. 4223.

advocate@gecko.org.au

0412 724 222.