For the attention: **Hoagy Moscrop-Allison** Senior Planner – Major Assessment City Development Branch Council of City of Gold Coast

#### Dear Hoagy Moscrop-Allison,

#### Objection submission COM/2019/81 - Deviations from City Plan

Please find below further information that I think should be considered re this development Application where I believe it diversifies away from the City Plan specific outcomes required.

#### City Pan V6, Part 3 Strategic Framework

If you overlay the existing quarries onto the future plans for the Gold Coast, as extracted from Figure 1 of the Strategic Framework (as shown below) it can be seen that the quarries marked in red are clearly not within the residential expansion/development areas. However, the Oxenford quarry is clearly in the heart of this residential expansion/development area. This is in the midst of the proposed infrastructure improvements shown.



I believe this demonstrates that the Oxenford Quarry should not form part of the future plans for this area as, as clearly shown above, this area is in the middle of the expansion/development area around the pacific motorway with the ever improving infrastructure between the Gold Coast and Brisbane. It should not be compromised for the next one hundred plus years, as proposed, by a dirty ugly, dusty spewing behemoth. Section 3.4.2 'Mixed Use Centres' of the Strategic Framework, Specific Outcome for Oxenford states: "(17) **Oxenford** provides a gateway to the northern hinterland. Development supports the clustering of business and industry activity. Retail gross floor area is limited to protect the viability and orderly development of the Coomera principal centre".

Destruction of the ridge for the next hundred plus years, as proposed, does not provide a suitable "gateway to the northern hinterland" as required by the Strategic framework specific outcome, it will however, provide a harsh, dusty, unsightly, highly industrial/commercial spectacle that everyone who is part of the Gold Coast would, in my opinion, come to regret throughout the rest of their lives.

You cannot, I believe, mix the "gateway to the northern hinterland" (and to Tamborine Mountain) with the requirements that a large quarry such as proposed will impose on the local environment. The visual aspects, the personal amenity aspects, the large number of haulage trucks, the dust, the noise, etc. cannot, I believe, be mixed with the specific outcome for Oxenford that the City Pan envisages.

I note, throughout the Strategic Framework Section, specific outcomes, there is no mention of the guarries. There is a lot about tourism and residential neighbourhoods, education, lifestyle, science and technology, creative industry, environmental industries (including renewable energy, waste treatment and recycling equipment). It is all about positivity and the Gold Coast of the future which I am all for. However, I believe a quarry in the midst of suburbia and a residential area too is not how the Gold Coast should be moving forward especially not with a 100 plus year plan of dust, noise, blasting, and all within a few hundred meters of the tourist theme parks (Paradise Country Children's park would be 500m from the extraction area). This will not be a good advert for tourist attraction to our area. Also, the Oxenford state school will be within 350m of the main processing unit, crushers, etc. when the main processing unit moves to the Northern location, as per the development application. In fact, as shown in Attachment A1, there are schools at 350m (Oxenford State School). 1000m Gaven State School, 1500m Highland Reserve State School and 3000m Helensvale State School. And there is also kindergartens at 650m, 800m and 1800m from the extractive boundary. Children's park at 315m pony club at 160m, Children's Aqua park at 270m, Wake park at 170m, Community pony club at 160m, World Famous Movie World at 1150m, Wet'n'Wild at 1745m, 'Top Golf' at 1650m, 'Australian Outback Spectacular' at 1750m, etc.

Not only is this application highly detrimental to the tourist industry it is also highly detrimental to young families, older families and retirees, who will ALL shun the area due to the ever present silica dust risk at such close location to the local schools, parks and homes. The Gold Coast attractions around the area will also be shunned, I believe, if the silica dust risk information becomes public knowledge.

### 3.5.5 Natural Resources, Specific outcomes

1) The prudent <u>use</u> of renewable and non-renewable natural resources supports long-term community needs and only occurs where any immediate or long-term environmental and social impacts can be managed to an acceptable level.

I do not believe the environmental; and social impacts can be managed to an acceptable level

- 2) Natural resource areas of economic value and associated haulage routes are protected from encroachment by activity that would compromise the ability to utilise the resource efficiently and sustainably. Natural resource areas of economic value, include:
  - (a) rural production areas (encompassing agriculture land); and
  - (b) extractive resource areas (committed and non-committed).

The Oxenford quarry has not been protected from encroachment neither has the associated haulage route. Therefore, the ability to utilise the resources has been highly compromised by the hundreds of homes and businesses in the area that have been permitted to be built, by the Gold Coast Council,

within both the 1000m separation area and the 100m metres (either side) of the haulage route. The Gold Coast Council is culpable, in my opinion, by allowing hundreds of properties to be built in the area, of ensuring this KRA no longer fulfils the necessary criteria for being an accessible KRA (two of the four components of being a KRA are appropriate 'separation buffer' and 'transport route'. Clearly these two components have been highly compromised).

 Committed and non-committed extractive resource areas and their associated haulage routes are protected from encroachment from incompatible <u>development</u>. Surrounding <u>development</u> minimises views into resource areas.

As (2) above. There has been hundreds of homes and businesses built within both the 1000m separation area and the 100m metres (either side) of the haulage route both before and since the quarries inception. The Gold Coast council are culpable in my opinion of not maintaining the required separation buffers. Also, "Surrounding development minimises views into resource areas". This development application conversely is seeking to encroach on existing development by proposing to quarry at elevations far higher than surrounding existing developments (homes etc) and thus will ironically maximise views into resource areas.

8) In committed areas, the extraction and haulage of the resource protects <u>environmental</u> <u>values</u> on the land as far as practicable; prevents significant impacts on nearby sensitive uses, including the <u>use</u> of appropriate separation areas/buffering; and does not scar vegetated ridgelines and elevated land when viewed from outside the resource area. The width and nature of separation areas/buffering vary from <u>site</u> to <u>site</u>, and depend on factors such as topography, <u>vegetation</u> and proximity to sensitive land uses.

Note: Within Key resource areas (KRA 67) Northern Darlington Range and (KRA 68) Oxenford 'indicative separation areas' are shown on the zone map due to the proximity of the resource/processing area to sensitive land uses. <u>Extractive industry</u> operations will provide appropriate separation areas/buffering in these locations to ensure adequate separation distances to sensitive land uses. This does not remove the requirement for separation areas/buffering to occur in other committed areas.

I do not believe the proposal to destroy an additional 30 hectares of 'Environmentally significant' (Biodiversity and priority species) and Koala habitat aligns with: "the extraction and haulage of the resource protects environmental values on the land". This development application is proposing significant impact on both the environments and sensitive receptors surrounding it. Also the specific outcome: "does not scar vegetated ridgelines and elevated land when viewed from outside the resource area" is clearly not been successfully addressed by this development application.

The note following 8) i.e. "Within Key resource area ... (KRA 68) Oxenford 'indicative separation areas' are shown on the zone map due to the proximity of the resource/processing area to sensitive land uses. Extractive industry **o**perations will provide appropriate separation areas/buffering in these locations to ensure adequate separation distances to sensitive land uses". However, as per DES guidelines the "appropriate separation areas/buffering" is 1000m for blasting quarries of this nature. This has been already severely compromised. This development application seeks to reduce these already highly compromised separation buffers in every direction down to unbelievable close proximity to sensitive receptors. Clearly the statement within this addendum to the City Plan: "Extractive industry **oper**ations will provide appropriate separation areas/buffering in these locations to ensure adequate separation distances to sensitive land uses" is being abused by the "Extractive Industry" seeking to reduce these separation buffers to an unprecedented distance from sensitive receptors. This addendum to note 8 is surely to attempt to pacify the already compromised separation buffers not to permit the "Extractive Industry" to set its

own separation buffers. This will have severe ramifications on its neighbours (Sensitive receptors) and I find the idea of permitting this is morally reprehensible.

11) Rehabilitation of land following extraction of the resource enhances ecological functions and visual amenity of the resource areas and facilitates reuse of the land for a range of appropriate activities.

The submitted development application does not seek to enhance the land following extraction it merely proposes to leave the benches in situ. This will not enhance the visual amenity. It will also not facilitate reuse if the land. It will instead make the area extremely dangerous with 15m drops; and unusable for the koala population due to the linear nature of the benches that will not allow the koala to roam in an area as it would naturally.

### 3.6.4 Transport system efficiency, Specific outcomes

11) Existing and future haulage routes from extractive industry uses to the Pacific Motorway are identified and protected from incompatible uses and managed to provide safe and efficient operation.

As stated above, the haulage route from the Oxenford quarry to the Pacific Highway has been highly compromised by hundreds of homes and businesses in the area being built within the required 100m corridor either side of the haulage route with the culpable permission of the Gold Coast Council. Clearly this route is no longer suitable to be a haulage route of the magnitude proposed due to its residential location within suburbia, its predominately single lane nature and its lack of footpaths and cycle ways through much of the route, it is part of the local bus routes and is also used by many school buses necessitating children (and adults) waiting at bus stops on a daily nature and being subjected to the fine road dust contamination kicked up by the haulage vehicles and also the carcinogenic fumes emitted from 342 trucks per day using the haulage route.

It has become a highly dangerous route as attested by our MP for Theodore, MP Mark Boothman, and his calls for urgent improvements on the Tamborine - Oxenford road at Junction 57 due to safety concerns. And also the Tamborine- Oxenford road at Michigan Drive junction due to additional safety concerns.

Clearly, this is neither a "safe" or an "efficient" operation as is required for a haulage route for extractive industry. To make it a compliant haulage route would require clearance of hundreds of homes and businesses in the area, rerouting of the buses and school buses and also suspension of the proposed rezoning of the Oxenford Rural homes in and around Ruth Terrace, Michigan Drive and Georgina Street as this will be impinging on the 100m haulage route corridor also.

Note: Existing and future haulage routes from <u>extractive industry</u> uses are conceptually shown on <u>strategic</u> <u>framework map 6</u>.

'Strategic Framework Map 6' (Attachment B1 and B2) does not show the quarry to pacific motorway route as a haulage route. Are we therefore to assume this particular haulage route is not part of the City Plan?

#### 3.7 Living with nature, Strategic outcomes

1) A comprehensive green space network of natural landscape areas is enhanced, maintained and protected for the nature conservation and recreation needs of the city and enhances the city's powerful image of green, gold and blue.

The green space network is not protected by this development application.

2) Land, freshwater, estuarine and marine ecological processes and other matters of environmental significance are protected and supported through a connected green space network.

Matters of environmental significance are not protected and supported by this development application. This development application also seeks to severely reduce the connectivity to the Nerang State Forest.

3) Non-urban land is protected to maintain the extent and diversity of the city's natural and productive rural landscapes and define a hard edge to the city's urban area.

This development application does not seek to protect and maintain the rural landscapes that it has under its protection. It seeks to destroy and degrade the non-urban land that is so highly visibly and environmentally significant.

4) Matters of environmental significance within <u>biodiversity</u> areas are protected in situ.

This development application does not seek to protect matters of environmental significance within biodiversity but instead proposes to offset its liability. This is not protecting in situ as required by the City Plan.

5) Outside of <u>biodiversity</u> areas high priority <u>vegetation</u> is protected in situ. Regulated, medium and general priority <u>vegetation</u> is maintained and disturbance is minimised.

This development application does not seek to protect matters of biodiversity and high priority vegetation in situ as required by the City Plan.

 Significant residual impacts on medium priority <u>vegetation</u> outside of <u>biodiversity</u> areas are managed through a prioritised hierarchy of avoiding, mitigation on-<u>site</u> and offsetting such impacts.

This development application fails to adequately consider, in my opinion, the 'avoid' and 'mitigate' aspects of residual impacts on medium priority vegetation as required by the City Plan.

7) Coastal environments are protected for their ecological, economic and recreational values

The submitted stormwater plan that is designed to fail at times of high rainfall is not protecting the ecological, economic and recreational values of the Coomera River.

8) Water quality and quantity in drainage catchments maintains the operation and health of ecosystems, provides flood mitigation and meets requirements for water-based primary and secondary leisure activities.

The submitted stormwater plan that is designed to fail at times of high rainfall is not protecting the ecological, economic and recreational values of the Coomera River. Also, alleged poor procedures in maintaining and washing concrete AGI trucks and allowing drainage of chemicals into the ground/ecosystem is contra to this aspect of the City Plan.

### 3.7.2 Element - Natural landscape areas, Specific outcomes

1. Natural landscape areas are retained and enhanced to perform essential functions such as nature conservation, cultural heritage, scenic amenity and other green space values, which are vital to protecting the city's matters of environmental significance, including <u>biodiversity</u> areas and landscape character.

#### Clearly the proposed development is contra to this Specific Outcome.

2. Natural landscape areas, like rural production areas and rural residential areas continue to maintain a green frame to the city's urban areas, particularly on the Hinterland ranges and foothills. This contributes to the city's distinctive <u>form</u>, visual attractiveness and role as a major tourist destination.

Clearly the proposed development is contra to this Specific Outcome also.

3. <u>Development</u> is of a <u>scale</u> and intensity that does not dominate the natural landscape within its context and locality.

The proposed development plans to perform quarrying operation from the very top of the ridgeline which is 150m AHD will have a dramatic effect within the context and the locality and an unprecedented scale. This, I strongly believe, is contra to this Specific Outcome.

#### 3.7.3.1 Specific Outcomes

- 1) The diverse green space network provides for recreation, community wellbeing, <u>biodiversity</u>, scenic amenity, <u>water catchment</u> management, cultural heritage, tourism, education and research. It includes:
- (a) hinterland areas including rural production areas, rural residential areas and natural landscape areas;
- (b) water supply catchment areas;
- (c) biodiversity areas and other matters of environmental significance;
- (d) the Merrimac/Carrara floodplain special management area;
- (e) the inter-urban break; and
- (f) open space and recreation areas, including sports grounds, bushland and paths.

The city's green space network also contains smaller open spaces and corridors not shown on the strategic framework maps that provide important green space values within the city's urban form and character.

- 2) The green space network links local and regional green space, including linking matters of environmental significance and extending hinterland to coast critical corridors.
- 3) The inter-urban break provides a green break between the urban corridor from Brisbane City and the northern suburbs of the Gold Coast, and incorporates a significant hinterland to coast critical corridor. The inter-urban break is retained and enhanced.
- 5) Waterways and riparian areas are protected as natural green space corridors to:
- (a) protect <u>vegetation</u>, wildlife <u>habitat</u> and ecological corridors;
- (b) protect scenic amenity;
- (c) provide continuous public access and parkland corridors for recreation, walking and cycling;
- (d) provide visual relief from the built environment and a retreat from developed areas;
- (e) provide flood mitigation, flood resilience, drainage and water quality functions;
- (f) provide natural and renewable water cycle processes (water health and water quality); and
- (g) protect foreshores from erosion and stormwater inflows.
- 6) The limited commercial uses in the city's green space network do not compromise the nature conservation, scenic amenity, recreation or other values of the green space network.
- 7) Public sport and recreation areas are retained for health, community and cultural benefits.
- 9) <u>Development</u> does not erode, and, wherever practicable, contributes to, the expansion of the extent, function and values of the green space network.
- 10) <u>Development</u> facilitates accessible, safe and integrated local open space networks that contribute to sense of place and quality of life.

The criteria above deserves detailed analysis against the development application submitted.

All of the following extracts from the City Plan, that are highlighted in red, also require detailed analysis as to how this development application fits within the City Plan.

# 3.7.4 Nature conservation, specific outcomes:

(1) The Gold Coast's <u>biodiversity</u> areas and other matters of environmental significance are conserved, protected, enhanced and managed to maintain terrestrial, aquatic and marine species, ecosystems and ecological processes. Poorly protected regional ecosystems and <u>habitat</u> for threatened spe are enhanced.			
2)	Biodiversity areas are fundamental elements of the city's green space network. These areas are conserved to maintain the diversity of terrestrial, aquatic and marine species, ecosystems and ecological processes. Mapped biodiversity areas include:		
	<ul> <li>(a) core habitats, that are extensive tracts of intact <u>habitat</u> within the hinterland and coastal wetlands areas; support a variety of <u>vegetation</u> associations; provide <u>habitat</u> for diverse fauna populations; and require the highest level of protection;</li> </ul>		
	(b) hinterland to coast critical corridors that link core habitat systems and isolated areas of biodiversity value by retaining existing vegetation and restoring degraded areas to enhance fauna movement between different ecosystems and landscapes; and		
	(c) substantial remnants of intact areas of vegetation that retain and enhance the diversity, extent and condition of habitat by avoiding impacts that originate from their urban context.		
3)	The city's matters of environmental significance include:		
	(a) native vegetation of national, state or local significance;		
	<li>(b) coastal environments, wetlands and waterways;</li>		
	<ul> <li>(c) core habitat areas and substantial remnants;</li> </ul>		
	<ul> <li>(d) hinterland to coast critical corridors, including:</li> </ul>		
	(i) Burleigh Heads to Springbrook;		
	(ii) Springbrook to Wongawallan;		
	(iii) Southern Moreton Bay to Wongawallan;		
	(iv) Southern Moreton Bay to Clagiraba;		
	(V) Currumbin to Cobaki Broadwater (Tweed Shire); and		
	(vi) Currumbin to Currumbin Valley.		
	(a) habitat for the stand energies such as leader		
	(e) habitat for threatened species, such as koalas.		
4)	In biodiversity areas, matters of environmental significance including vegetation and habitat for native flora and fauna are protected in situ, and degraded areas are restored to improve habitat guality and connectivity.		
(5)	Outside biodiversity areas: high priority vegetation is protected in situ; buffers are provided to wetlands and waterways; degraded areas are restored where this improves habitat or connectivity; and development includes the consideration of alternative designs and the separation of incompatible activities to minimise the impacts on matters of environmental significance.		
6)	Outside biodiversity areas, significant residual impacts on medium priority vegetation are managed, in order of priority, by:		
	<ul> <li>avoiding significant adverse environmental impacts;</li> </ul>		
	(b) mitigating significant adverse environmental impacts where these cannot be avoided; and		
	(c) offsetting any significant residual impacts.		
7)	Matters of environmental significance in the city's non-urban area are protected from urban encroachment by containing urban activity within the city's urban area.		
(8)	Matters of environmental significance and rural production activities co-exist in a number of hinterland localities, including the areas of Currumbin, Tallebudgera, Springbrook, Lower Beechmont, Guanaba, Clagiraba, Wongawallan and Numinbah Valleys. Compatible rural production activities only occur on existing cleared land.		

# 3.7.5 Coastal, wetland and waterway areas, Specific outcomes:

3.7.8	3.7.5.1 Specific outcomes				
(1)	Coastal terrestrial, aquatic and marine ecosystems and their ecological processes are protected to sustain their viability. This includes the conservation and enhancement of endemic vegetation on beaches, dunes and coastal headlands, and along natural waterways and floodplains.				
(2)	Public access to coastal waters and foreshores is maintained and enhanced where it is safe and where coastal environments are protected.				
(3)	Disturbance to undeveloped parts of erosion-prone areas, storm-tide inundation hazard areas, tidal waterways and nutrient hazard areas is avoided other than for maritime infrastructure where impacts are minimised.				
(4)	The aquatic, riparian and intertidal ecosystems of Moreton Bay Broadwater are conserved to support the objectives of the Moreton Bay Marine Park and declared fish habitat areas. This includes its value as a commercial fishery and recreational area.				
(5)	South Stradbroke Island is recognised as part of a complex system of sand islands of global importance. These islands are protected for their environmental, ecological and visual significance.				
(6)	Water quality and quantity in all catchments is maintained to support water body health and biodiversity, and support compatible water-based leisure opportunities.				
(7)	The integrity of catchment areas is maintained in natural landscape areas, rural production areas and rural residential areas. Disturbance to existing landforms, ecological features, surface drainage, waterways and groundwater movement is avoided or minimised. Water is used and managed as part of a total water cycle in which:				
	<ul> <li>(a) natural drainage regimes and hydrological processes are maintained as far as possible;</li> </ul>				
	<li>(b) ecosystem health and water quality is protected or enhanced;</li>				
	<li>(c) public health and safety are protected and damage to property is avoided;</li>				
	(d) run off is controlled;				
	(e) water is used efficiently as a limited resource; and				
	<li>(f) on-site sewerage facilities are appropriately designed and maintained.</li>				
(8)	The Hinze and Little Nerang Dam water supply catchment areas are managed to ensure the highest level of protection possible to the city's potable water supply.				
(9)	Marine industries have minimal impacts on water quality, vegetation and bank stabilisation. Dredging is managed to maintain boat access and channel integrity in areas of high boat traffic while maintaining foreshore integrity.				
(10)					
(11)	) The flood prone nature of the Merrimac/Carrara flood plain special management area is managed to accommodate major flood flow paths and retardation areas used for stormwater quality management. Development is limited to clusters of urban uses within the least flood affected and environmentally sensitive areas.				

# 3.8 A safe, well designed city, Specific outcomes:

(1)	Areas of landscape character that contribute to the city's unique landscape and built form are identified and protected.			
(2)	Important elements of urban character and community significance are protected and enhanced to strengthen the sense of identity in local areas and the city.			
(3)	) The design and development of new or renewed communities foster a strong sense of community identity and promote community wellbeing.			
(4)	Excellence and innovation in urban design and architecture is delivered through highly functional, accessible, attractive, memorable and sustainable buildings and public spaces that make a positive contribution to the city image.			
(5)	Places of cultural heritage are identified and protected.			
(6)	Cultural landscapes of significance are protected in partnership with traditional owners.			
(7)	Communities and environments are safe and attractive places to work, live in and visit.			
(8)	The increased number of residents, workers and visitors to the city is supported by appropriate and accessible social infrastructure.			
(9)	Community, educational, civic, cultural, recreation and sporting facilities maximise opportunities for community interaction, strengthen social networks and encourage active and healthy lifestyles.			
(10)	Existing and planned community infrastructure and corridors are protected to provide safe and optimal essential services to the community.			
(11)	Activities that generate emissions or impacts are adequately separated, designed and managed to avoid environmental harm or nuisance to residential or other sensitive use areas.			
(12)	2) Special industry uses occur in very limited circumstances due to their noxious and hazardous nature and impacts on existing and planned <u>development</u> , including sensitive uses.			
(13)	Residential and other sensitive uses are located away from areas that could cause environmental harm or nuisance from emissions or other impacts.			
(14)	) Greater resilience to the impacts from natural hazards is achieved by managing and minimising risks in susceptible areas. Some parts of the city are unsuitable for development due to the extent of natural hazard affectation.			
(15)	Sustainable infrastructure provision is efficient, timely and environmentally responsible.			
(16)	Party houses only occur within the party house area identified on the Party house area overlay map due to their impacts on existing and planned			

### 3.8.2 Landscape character, Specific outcomes:

)	The distinctive rural, semi-rural and natural character of the city's river valleys, hinterland settlements, extensive natural landscape areas, rural production areas and rural residential areas provide a clear hard edge to, and natural backdrop setting for, the city's urban area.
2)	The city's natural, non-urbanised appearance is protected for its contribution to the city's outstanding scenic amenity, image and role as a major tourist destination.
	The city's significant natural features include:
	<ul> <li>(a) ocean beaches, dunal systems and natural foreshore areas;</li> </ul>
	<ul> <li>(b) major and minor coastal vegetated headlands, hills and rocky outcrops;</li> </ul>
	<ul> <li>(c) prominent beachside and broadwater open space areas;</li> </ul>
	<ul> <li>(d) Southern Moreton Bay and Broadwater Islands (including South Stradbroke Island and estuaries);</li> </ul>
	(e) the Spit;
_	(f) rivers and creeks;
	(g) natural lakes and wetlands areas;
	<ul> <li>(h) major and minor ridgelines, prominent foothills and face slopes;</li> </ul>
	(i) Springbrook plateau, Mount Cougal Twin Peaks, Beechmont and Tamborine ranges;
	<li>Hinze Dam water supply catchment area;</li>
_	(k) Inter-urban break;
E	<li>(I) prominent areas of native vegetation;</li>
Л	(m) Nerang State forest;
	(n) scenic routes;
	(o) Merrimac/Carrara floodplain special management area; and
	(p) rural production areas and rural residential areas.
)	The undeveloped character of the islands and the open waters of Moreton Bay and the Broadwater foreshores are protected.
Within the coastal strip, natural elements such as beaches, adjoining parkland, rocky outcrops, vegetated headlands, natural estuarine landscapes and coas vegetation are retained and enhanced.	
i)	The distinctive open space character of the Merrimac/Carrara floodplain special management area is maintained.
)	Natural landscape areas are protected for their contribution to the city's scenic amenity and nature conservation.
)	Rural production areas and rural residential areas are protected for their contribution to the city's scenic amenity.
3)	The landscape significance of the major ridgelines and minor ridgelines, including Burleigh Ridge and Currumbin Hill, characterised by their steep slopes and native vegetation cover, is protected by retaining and enhancing vegetation cover where possible; restricting building heights; and ensuring building designs preserve the existing natural landform and complement the vegetated hillscape character.
)	The Springbrook plateau, Beechmont and Tamborine ranges and Hinze Dam water supply catchment areas are protected as assets of outstanding landscape interest.
10)	The flat to undulating coastal lowlands and wetlands of the East Coomera/Yawalpah area that adjoin the Moreton Bay Marine Park and the two coastal ridges that defi the McCoy's Creek catchment are protected. This area provides and retains a natural, non-urbanised backdrop to the urban areas of Hope Island and frames the cane lands to the north.
1)	The landscape significance of distinct valleys – Numinbah, Bonogin, Currumbin, Tallebudgera valleys and unnamed valleys (Mudgeeraba Creek, Hinze Dam, Cedar Creek, Tamborine, Albert River valleys) – characterised as narrow valleys with flat floors and foothills semi-enclosed by steep forested hillsides and vegetated creek lines, is protected by:
	<ul> <li>(a) maintaining a low intensity, low-rise appearance in relation to tree canopy height and ridgelines;</li> </ul>
	(b) preserving the existing natural landform and retaining existing <u>vegetation</u> ; and
I	(c) ensuring the visual impact of all development on scenic amenity is addressed through well considered planning, placement and mitigation measures.
	Development in these areas enhances ecological and recreational connections and restores degraded landscapes.
2)	The Gold Coast Highway's distinctive view to the beach and the strong edge established by the Norfolk pines within Justins Park is retained.

#### 3.8.5 Safe, healthy and cohesive communities, Specific outcomes:

#### 3.8.5.1 Specific outcomes

(1) The design and management of development creates positive social and health impacts.

(2) Highly interconnected neighbourhoods encourage social diversity, cohesion and integration.

(4) Social, community and public infrastructure including recreation facilities maximises social, economic and physical accessibility. Provision occurs in the initial stages of the <u>development</u> of new communities. Stand-alone facilities only occur where there is a demonstrated community need and where alternative locations are unsuitable.

(5) Social, community and public infrastructure, including recreation facilities:

- (a) are flexible, adaptable and multi-use to support a range of social, cultural and civic uses and needs, including temporary uses such as festivals or community
  evacuation centres in times of need;
- (b) balance active and passive recreation opportunities;
- (c) integrate into the urban environment to provide opportunities for people to socialise and engage in active and healthy lifestyles; and
- (d) incorporate complementary activities including community gardens, companion animal exercise areas, cafes or markets.

<sup>(3)</sup> The city's public realm creates safe and supportive environments through design, management and a sense of ownership. These areas provide opportunities for social interaction and civic participation.

# 3.8.6 Element - Environmental health and amenity, Specific Outcomes:

)	Activities that could conflict with the health and amenity of existing or planned sensitive uses are adequately separated, designed and managed. These activities include those that generate noise, traffic, air pollution, electromagnetic emissions, dust, light, glare, reflectivity, vibration or odour impacts above accepted standards. Such activities include industry and extractive industry uses.				
(2)	The impact of traffic and transport noise on existing or planned sensitive uses is minimised through appropriate site and building design and, where necessary, the provision of noise mitigation measures.				
(3)	Noise mitigation occurs at the source. Where this is not practicable, measures at the receiving environment maintain acceptable standards of amenity for sensitive uses without detracting from streetscape quality.				
(4)	The impact of aircraft and airport noise on existing or planned sensitive uses is managed through the appropriate design and location of new development, including acceptable noise mitigation techniques.				
(5)	Existing or planned sensitive uses do not unreasonably constrain or adversely impact on the safe and optimal operation of existing and planned strategic infrastructure sites and corridors that are important to the efficient functioning of the city or region. Strategic infrastructure sites and corridors include:				
	<ul> <li>(a) essential public services and facilities, such as water and wastewater treatment plants, major electricity infrastructure, landfill sites, emergency facilities and hospitals;</li> </ul>				
	(b) general and <u>marine industry</u> areas;				
_	(c) strategic freight corridors;				
	<ul> <li>(d) resource areas, including committed and non-committed extractive resource sites and their haulage routes;</li> </ul>				
	<ul> <li>(e) rural production areas, including strategic <u>cropping</u> and agriculture land;</li> </ul>				
	(f) Gold Coast Airport;				
	(g) transport terminals, heavy rail and the major road network;				
	<ul><li>(h) theme parks and tourist attractions;</li></ul>				
_	<li>district and regional sport and recreation facilities, such as motor sport parks; and</li>				
_[	<ul> <li>(i) other essential community or productive sites, facilities and corridors having the potential to impact the amenity of a sensitive use.</li> </ul>				
(6)	Medium-to-large scale places of worship, where operating outside the hours of 7am to 6pm, are not established in general industry fringe areas in close proximity to existing or planned sensitive uses.				
(7)	High impact industry and medium impact industry uses only occur outside of areas designated for these uses when it is demonstrated that they will not cause conflict, risk, danger or amenity impacts above accepted standards to any other existing or planned development.				
(8)	Special industry uses only occur in high impact industry areas where:				
	(a) they achieve minimum separation areas of 500 metres for distilling alcohol or 1,500 metres for all other activities to existing or planned sensitive uses; and				
	(b) it is demonstrated that they will not cause conflict, risk, danger or amenity impacts above accepted standards to any other existing or planned development.				
	This includes the health and safety of persons engaged, employed or resident on the site of any other development within the use's area of influence, including residential and non-residential uses.				
(9)	The Rocky Point Sugar Mill is recognised as an existing special industry use that contributes to the city's economy. The operation of the sugar mill is protected from incompatible activities (including the encroachment or intensification of residential or other sensitive uses within its separation area).				
(10)	Renewable energy facilities are located, designed and managed to minimise environmental harm and protect the amenity of existing or planned sensitive uses.				
(11)	Waste collection, storage and disposal facilities are located, designed and managed to minimise environmental harm and protect the amenity of existing or planned sensitive uses. These facilities are avoided on land not capable of rehabilitation and long-term environmentally sustainable management practices adopted.				
(12)	Infrastructure and utilities to service new development, including on-site waste storage and recycling facilities, minimise environmental harm and protect the amenity of existing or planned sensitive uses prior to the new development commencing.				
(13)	13) The amenity intended for Urban neighbourhoods, Suburban neighbourhoods, New communities, Merrimac/Carrara flood plain special management area, Town Rural residential areas, Mixed use centres, Specialist centres, Neighbourhood centres, Industry and business areas and Rural production areas and rural enter protected by locating local party houses only in the party house area identified on the Party house area overlay map and regulating the operation of Party house ensure the residential amenity of the surrounding area is maintained.				

# 3.8.7 Element - Natural hazards, Specific Outcomes:

(1) <u>Development</u> avoids natural hazard areas where the risk to life and property, the likely cost of damage, or the measures needed to effectively mitigate the risk are unacceptable. Natural hazards include bushfire, flooding, landslide and coastal risks.				
(2)	Development in natural hazard areas only occurs if it:			
	<ul> <li>(a) is located, designed and managed to mitigate the risk to life and property;</li> </ul>			
	(b) does not occur at the expense of other <u>environmental values</u> ; and			
	(c) supports, and does not unduly burden, disaster management response or recovery capacity and capabilities.			
(3)	3) Development in acid sulfate soil hazard areas is located to avoid the release of acid and metal contaminants or manage disturbance where it can be demonstrated the disturbance is unavoidable.			
(4)	Development in bushfire hazard areas is avoided where conservation and landscape protection constraints preclude necessary risk-reduction measures, including clearing and provision of adequate access.			
(5)	Important social, community and public infrastructure and services that are vulnerable to natural hazards are designed and located to minimise ris	k of failure during a		
	natural hazard event. Important infrastructure and services include:			
	natural hazard event. Important infrastructure and services include: (a) water and <u>wastewater</u> utilities;			
	(a) water and wastewater utilities;			
	<ul> <li>(a) water and wastewater utilities;</li> <li>(b) power and gas supplies;</li> </ul>			
	<ul> <li>(a) water and <u>wastewater</u> utilities;</li> <li>(b) power and gas supplies;</li> <li>(c) telecommunication network facilities;</li> </ul>			
	<ul> <li>(a) water and <u>wastewater</u> utilities;</li> <li>(b) power and gas supplies;</li> <li>(c) telecommunication network facilities;</li> <li>(d) the <u>road</u> network;</li> </ul>			
	<ul> <li>(a) water and <u>wastewater</u> utilities;</li> <li>(b) power and gas supplies;</li> <li>(c) telecommunication network facilities;</li> <li>(d) the <u>road</u> network;</li> <li>(e) police and <u>emergency services</u> facilities, including identified community evacuation centres;</li> </ul>			

Further, all of the following components of the City Plan also require detailed analysis as to how this development application fits within the City Plan:

Part 9 Development Codes Part 9.4 Other development codes Part 9.4.4 General development provisions code Part 9.4.4.3 Specific benchmarks for assessment Part B assessable development (Table 9.4.4-2) PO1 Development mitigates any negative effects to amenity, health and safety from existing surrounding activities having regard to: (a) noise, (b) hours of operation (c) traffic (e) Visual Amenity (f) Wind effects (h) Vibration (i) Contaminated substances - AGI Truck wash out (i) Hazardous chemicals - AGI Truck wash out (k) Odours and emissions (I) safety - Blasting, silica dust, possible asbestos

All of the above points need careful consideration with regard to this development application.

PO2 The proposed development prevents loss of amenity and threats to health and safety, having regard to::

(a) noise,
(b) hours of operation
(c) traffic
(e) Visual Amenity
(f) Wind effects
(h) Vibration
(i) Contaminated substances - AGI Truck wash out
(j) Hazardous chemicals - AGI Truck wash out
(k) Odours and emissions
(l) safety - Blasting, silica dust, possible asbestos

All of the above points need careful consideration with regard to this development application.

**PO3** <u>Development</u> adjacent to the Pacific Motorway and heavy railway line minimises views of the storage of outdoor plant and equipment, including service areas to provide an attractive outlook for persons using the transport network.

**AO3** Where the <u>site</u> is adjacent to the Pacific Motorway or a heavy rail line, areas used for outdoor storage, including service areas are screened from view from users of the motorway or heavy rail line by buildings, solid fencing or <u>vegetation</u>.

Although not adjacent to the Pacific Motorway the extent of the proposed excavations on the ridge will be visible from Pacific Motorway

**PO4** The proposal provides landscape work that protects and enhances the character of the local area.

**AO4.1** For all development except dwelling houses, dual occupancies, caretaker's accommodation and community residences a Statement of Landscape Intent prepared in accordance with **SC6.12** City Plan **policy –** Landscape work demonstrating that the landscaping will provide amenity for site users and will protect and enhance the character of the local area.



PO5 All mechanical equipment is located and housed so as not to cause disturbance to residents within or adjoining the development.

AO5 For all development except dwelling houses, dual occupancies, caretaker's accommodation and community residences:

The mechanical equipment, including air-conditioning plant and swimming pool pumps, is incorporated within the building. OR The mechanical equipment, including air-conditioning plant and swimming pool pumps, is housed external to the principal building and: is contained within a solid structure;

**PO9** Earthworks and retaining walls associated with the development do not create a negative visual impact upon neighbouring properties or the streetscape.

PO10 Development does not cause adverse stormwater drainage impacts on or off the site.

AO10 All development incorporates stormwater drainage works to comply with the requirements of SC6.11 City Plan policy – Land development guidelines, Section 4 – Stormwater drainage and water sensitive urban design standards.

PO12 Development is undertaken in accordance with the Performance Criteria specified in the Queensland Development Code MP1.4 – Building over or near relevant infrastructure. e.g..Stormwater drains

AO12 Development is undertaken in accordance with the Acceptable Solutions specified in the Queensland Development Code MP1.4 – Building over or near relevant infrastructure.

PO13 Development is designed to:

- (a) complement the character and address any impacts on the amenity and environment of the local area;
- (b) avoid any risk to life or property arising from natural hazards; and
- (c) protect significant natural habitat areas, wildlife corridors, wetlands and waterway corridors.

Part 9 Development Codes

Part 9.4 Other development codes

Part 9.4.5 Healthy waters code - for assessable development

PO1 Development appropriately manages stormwater quality to:

- (a) protect natural ecosystems;
- (b) integrate stormwater treatment into the urban landscape;
- (c) protect water quality;
- (d) reduce runoff and peak flows; and
- (e) meet the water quality objectives and environmental values for Queensland waters.

**AO1.3** Where development is not listed in AO1 a Stormwater Quality Management Plan is prepared by a suitably-qualified person in accordance with the Stormwater **quality management guidelines** in SC6.11 City Plan policy – Land development guidelines, Section 8 – Engineering drawings, documents and reports.

**PO2** Stormwater quantity management outcomes demonstrate no adverse impact on stormwater flooding or the drainage of properties external to the subject site.

AO2 A stormwater quantity management plan is prepared by a suitably qualified person and demonstrates:

(a) achievable stormwater quantity control measures for discharge during both the construction and operational phases of development designed in accordance with the *Queensland Urban Drainage Manual (QUDM)* unless subject to specific requirements of SC6.11 City Plan policy – Land development guidelines, Section 4 – Stormwater drainage and water sensitive urban design standards;

(b) on-site detention systems that are designed to restrict peak outflows for Q2, Q5, Q10, Q20 Q50 and Q100 to pre-development conditions.

**PO4** Construction and operational activities avoid or minimise adverse impacts of altered stormwater quality and quantity.

**AO4** Development achieves the Frequent Flow Management and Waterway Stability Management design objectives as stated within *Chapter 2 – Section 2.4.2* of the *Urban Stormwater Quality Planning Guidelines 2010.* 

PO5 Development does not discharge wastewater to receiving waters or areas external to the site unless demonstrated to be the best-practice environmental management for that site and takes into consideration:

- (a) the applicable water quality objectives for the receiving waters; and
- (b) the potential adverse impact on ecosystem health of receiving waters.

AO5 Where the development involves the discharge of wastewater,

a Wastewater Management Plan (WWMP) is prepared, demonstrating compliance with the performance outcome, by a suitably qualified person and submitted to the Council, detailing all of the following:

- (a) wastewater type;
- (b) climatic conditions;
- (c) water quality objectives;
- (d) best-practice environmental management;
- (e) waste management hierarchy; and
- (f) the WWMP provides for the management of wastewater in accordance with a wastewater management hierarchy that:
  - i. avoids wastewater discharge to waterways; or
  - ii. if wastewater discharge to the environment cannot practicably be avoided wastewater discharge to waterways is minimised through re-use, recycling, recovery and treatment for disposal to sewer, surface water and groundwater.

**PO6** Development does not cause erosion or allow sediments to leave the site.

**AO6** An **Erosion hazard assessment** completed in accordance with the criteria in **Table 9.4.5-3** is undertaken to establish the level of risk for soil erosion and sediment pollution to the environment.

Where the Erosion hazard assessment has a risk score less than or equal to 10:

A deemed to comply report is prepared by a suitably qualified person for Council approval, including conceptual location and design drawings of each treatment measure in plan and section views, in accordance with the *Best Practice Erosion and Sediment Control: International Erosion Control Association, (IECA) 2008, Australasia Chapter 2008.* 

#### Where the Erosion hazard assessment has a risk score greater than 10:

A conceptual erosion and sediment control plan (ESCP) is prepared by a suitably qualified person for Council approval in accordance with the *Best Practice Erosion and Sediment Control: International Erosion Control Association, (IECA) 2008, Australasia Chapter 2008.* 

Part 9 Development Codes Part 9.4 Other development codes Part 9.4.6 Landscape work code

PO1 All landscape work complements and enhances new and existing development and landscape values by:

- (a) responding to the opportunities and constraints of the site;
- (b) creating a sense of place and character;
- (c) providing long-term visual amenity;
- (d) reinforcing and enhancing the local landscape character;
- (e) ensuring it is suited to the environmental, climatic, soil and aspect conditions of the area;
- (f) having regard for ongoing efficient maintenance outcomes; and
- (g) contributing to a safe and inclusive environment through design.

Note: A Detailed landscape plan, prepared in accordance with SC6.12 City Plan policy – Landscape work, is required to demonstrate compliance with this provision.

Note: Where a Statement of landscape intent has been endorsed through an earlier approval, the Detailed landscape plan should be in accordance with that approval.

AO1 No acceptable outcome provided.

**PO4** Best management practices must be utilised for all pre and post works treatment and all operational works associated with any tree or vegetation to be retained and protected, relocated or propagated.

**AO4** Trees identified in a landscape intent or development approval for retention are protected in accordance with the Guidelines for retaining and protection of existing vegetation within the SC6.12 City Plan policy – Landscape work.

#### PO5

Landscaping contributes to a safe environment by:

- (a) providing clear sightlines;
- (b) minimising concealment spots; and
- (c) providing good visibility to entrance and exit points.

AO5 No acceptable outcome provided. (15m bench drops adjoining open space and emerging community Lots and arterial roads)

Note: Refer to SC6.12 City Plan policy – Landscape work and SC6.11 City Plan policy – Land development guidelines, Section 5 – Public open space standards for guidance.

PO7 Batters must:

- (a) be sensitively designed as an integral part of the development works, with the design being appropriate to their function and location;
- (b) be stabilised through sufficient landscape works to control soil erosion; and
- (c) enhance visual amenity.

AO7 Batters are designed in accordance with SC6.12 City Plan policy – Landscape work.

**PO9** All hard surfacing in open space areas and areas external to buildings must be designed to provide for safety, be functionally appropriate, enhance visual amenity, and have regard for ongoing maintenance requirements. (15 m bench drops -safety? Enhance visual amenity?)

**AO9** Hard surfacing is designed in accordance with SC6.12 City Plan policy – Landscape work.

PO15 Landscaped buffers:

- (a) are sensitively designed as an integral part of the site;
- (b) incorporate retained native vegetation;
- (c) are appropriate to their function;
- (d) are of a sufficient width;
- (e) enhance visual amenity; and
- (f) have appropriate maintenance regimes.

AO15 No acceptable outcome provided.

Part 9 Development Codes

Part 9.4 Other development codes

Part 9.4.7 On-site sewage facilities code

PO1

Development on land not serviced by sewer infrastructure has a suitable onsite wastewater disposal area that complies with:

- (a) Queensland Plumbing and Wastewater Code;
- (b) AS/NZS 1547:2012 On-site domestic wastewater management, and
- AS/NZ 1546.1:2008 On-site domestic wastewater treatment units Part 1: Septic tanks, AS/NZS 1546.2:2008 On-site domestic wastewater treatment units Part 2: Waterless composting toilets and AS/NZS 1546.3:2008 On-site domestic wastewater treatment units – Part 3: Aerated wastewater treatment systems.

**AO1** No acceptable outcome provided.

PO2 The on-site sewerage facility is provided on the same lot as the proposed development.

AO2 No acceptable outcome provided

Part 9 Development Codes

#### Part 9.4 Other development codes

Part 9.4.8 Reconfiguring a lot code

PO21 A public open space network is provided which:

- (a) has a range of recreation settings and adequate facilities to meet the needs of the community;
- (b) offers opportunities for residents to conveniently participate in passive recreational activities;
- (c) delivers well distributed public open space that contributes to the legibility, accessibility, safety, and character of the development;
- (d) creates safe and attractive settings and focal points;
- (e) facilitates casual surveillance from adjacent streets and land uses and provides for open space areas with public road frontages;
- (f) delivers for stormwater and flood management and care of valuable environmental resources; and
- (g) is cost effective to maintain.

AO21.1 Land intended for public open space is of a physical standard and condition in accordance with the SC6.11 City Plan policy – Land development guidelines, Section 5 – Public open space standards.

PO22 The design and location of open space results in high-quality parkland which:

- (a) enables the retention and protection of matters of environmental significance, their associated buffers, assessable vegetation, habitat features and natural cultural features;
- (b) contributes to the visual amenity of the area and facilitates casual surveillance;
- (c) can be easily accessed along road frontages;
- (d) directly adjoins existing or proposed open space areas; and
- (e) creates opportunities for linkages between open space areas.

AO22.2 Open space for conservation purposes is consolidated with other conservation areas to allow for a connected movement corridor.

PO23 Open space areas are designed and managed to promote user safety.

**PO24** Staging of the subdivision ensures that safe and convenient access to public transport, open space, community facilities, convenience shopping and local employment opportunities integrate with community need.

Part 9 Development Codes

Part 9.4 Other development codes Part 9.4.11 Social and health impact assessment (SHIA) code

PO1 Development demonstrates that social and health impacts have been identified, positive impacts have been enhanced and negative impacts have been mitigated having particular regard, but not necessarily limited to, the following matters:

- (a) population characteristics;
- (b) accommodation and housing;
- (c) connectivity and accessibility;

- (d) social connection;
- (e) health and wellbeing;
- (f) crime and public safety; and
- (g) training, employment and local economic effects.

AO1 No acceptable outcome provided.

# **Conclusion**

I believe ALL the above mentioned aspects of the City Plan require careful analysis as there appears to be a high number of occurrences where the submitted development application deviates significantly from the City Plan specific outcomes required.

Thank you for considering my objection.



Attachment A1 - Local Schools, Kindergartens and Children based attractions within the area

#### Attachment B1 - Part 3 Strategic Framework 3.6.4.1 Specific Outcomes

PDF version	3.6.4.1 Specific outcomes
? Help	<ol> <li>The city's <u>road hierarchy</u> contains regional and cross city traffic on highways and arterial <u>road</u> systems.</li> <li>Local road networks are permeable and legible to facilitate high connectivity, an effective public transport system and increased walking and cycling.</li> </ol>
City Plan Version 6	(2) Exclaring interview and preference and regime to inclinate ingrit connectinity, an entercine position analysis system and inclused waining and cycling. (3) Transport facilities and routes, including active and public transport, are functional, attractive, complement local character and help enhance the city's image.
Citation and commencement	(4) Device and reading, including data datapoint canapari, an anatomic, conjunction read read and they transite the entry of the provided and the set of the provided and the provided and the set of the provided and the provided and the set of the provided and the provided and the set of the provided and the provided
Part 1 About the City Plan	(5) The type, location and design of development achieves a safe and efficient transport system by:
Part 2 State planning provisions	<ul> <li>(a) ensuring appropriate controls for the number, size and position of vehicle access points;</li> </ul>
Part 3 Strategic framework	(b) facilitating a functional road hierarchy; and
Part 4 Local government infrastructure plan	(c) minimising direct vehicle access to higher-order roads.
	(6) The integration of off-street parking, loading, servicing and access facilities with developments achieves a pedestrian-focused environment and high quality public realm.
Part 5 Tables of assessment	(7) Car parking is reduced in areas serviced by high frequency public transport, including mixed use centres, specialist centres and the light rail urban renewal area. Lower the data and a building mixed use centres is the control of the matching and the light rail urban renewal area.
Part 6 Zones	rates of car parking may be applied in other locations depending on land uses and public transport accessibility, including major sporting facilities. (8) Land uses involving heavy vehicles – including industry, freight and logistics – are located in areas that facilitate efficient and easy access to major roads.
Part 7 Local plans	(a) Can use an inclusing nearly venues - including modely, regrit and rogatics - are coaled in alreas that realistic entern and easy access to major roads. (b) Can use waste storage and recycling facilities allow safe collection with minimal disruption to transport systems.
Part 8 Overlays	(r) Or greate solving and recycling isomer and concerned with remaining output of an appoint systems.
Part 9 Development codes	(11) Existing and future haulage routes from extractive industry uses to the Pacific Motorway are identified and protected from incompatible uses and managed to provide
Part 10 Other plans	safe and efficient operation.
Schedule 1 Definitions	(12) Strategic freight routes and associated freight generating land uses are protected from encroachment by incompatible land uses.
Schedule 2 Mapping	Note: High frequency public transport routes and major roads are conceptually shown on strategic framework map 6.
Schedule 3 Local government infrastructure plan mapping and supporting material	Note: Existing and future haulage routes from extractive industry uses are conceptually shown on strategic framework map 6.
Schedule 4 Notations required under the Planning Act 2016	Note: To address concerns with congestion on the Pacific Motorway between Stapylton and Carrara, and the cost of this congestion to the Gold Coast economy, the City of Gold Coast will undertake a joint planning investigation with the State Department of Transport and Main Roads to identify future road requirements for the northern Gold Coast.
Schedule 5 Designation of premises for development of infrastructure	3.6.5 Element - Air transport
Schedule 6 City Plan policies	3.6.5.1 Specific outcomes
<ul> <li>Appendix 1 Index and glossary of abbreviations and acronyms</li> </ul>	(1) The Gold Coast Airport maintains safe, secure and efficient airport operations. Flight paths are protected and restrictions placed on incompatible <u>development</u> , including <u>building height</u> and encroachment by sensitive uses.
Appendix 2 Table of amendments	Note: The Gold Coast Airport is conceptually shown on Strategic framework maps 2, 5 and 6.
	4

#### Attachment B2 - Strategic Framework Map 6

