

## **Submission in relation to Gold Coast Airport Hotel Major Development Plan - Preliminary Draft**

Tweed Shire Council (the “Council”) welcomes the opportunity to provide feedback on Gold Coast Airport’s Airport Hotel Major Development Plan - Preliminary Draft (the “Hotel Plan”).

Gold Coast Airport is a major domestic and international transport facility and economic contributor for both NSW and Queensland on whose borders it crosses into both the Tweed and Gold Coast City Council local government areas.

We note the airport hotel development is proposed on land that is wholly within Queensland and despite this the inclusion of a major hotel facility will benefit our NSW region through a strengthening of the Airport’s capability to service the needs and expectations of the projected growth in passenger numbers and will assist with capturing greater visitation and spend in both our regions.

The proposed hotel is a positive addition to the airport and is welcomed.

Having reviewed the Hotel Plan, we also take the opportunity to provide the following feedback.

### **Comments of the Draft Plan**

1. The Hotel Plan highlights within Table 1.1 Major Development Plan Requirements the range of matters to be considered under Section 91 of the *Airports Act 1996* and we note s 91(1)(ga) raises the need to consider the likely effect on, among others:
  - The local and regional economy
  - How the proposed development fits within the local planning schemes for commercial and retail development in the adjacent area
  - Employment levels at the airport (logically in connection with the proposal)

While the proposed hotel is generally perceived to be of economic and employment benefit to the wider locality the matters required to be addressed are not seemingly done so or not least in a coherent way with clear linkages to this aspect of s 91. It would benefit the reader if the matters listed above were adequately described under a heading dealing specifically with those, and evidentially demonstrating the benefits we presume to exist, along with any likely negative aspects, so that there is a balanced discussion of the advantages and disadvantages supporting the hotel proposal. For example, there is no discussion of how the proposal ‘fits’ within the current long-term strategic planning established within the airports wider surrounds and how it may impact (positively or otherwise) both current and planned commercial and retailed centres. There is no related reference to the Tweed’s Economic Development Strategy and consequently no explanation (consideration) as to what the likely affect might be.

We do note that the ‘introduction’ to the Hotel Plan does provide a broad narrative of the perceived benefits associated with the provision of a ‘quality’ hotel, but this of itself does not demonstrate consideration of s 91 in adequate and legible terms.

Tweed’s economic development strategy provides a range of key economic ‘directions’ which would seemingly be supported by the growth and development of the Airport, specifically a quality hotel, and includes the following:

#### **4.3.2 Tweed Heads City Centre revitalisation, and**

- 9.3.2 *Education, Research and Business Park leveraging from Tweed Heads Geographic Location, including:*  
44 *Feasibility study into establishment of a business and research park on sites in proximity to Gold Coast Airport and Southern Cross University.*

Addressing those relevant actions in the Hotel Plan would in our view have benefited the wider public interest and assisted with articulating the importance of this major development proposal to our regions.

2. Under section 4.4 of the hotel Plan, which addresses 'Consistency with State and Local Government Planning' there is comment in paragraph 2 on page 21 that is erroneous and misleading, where it states that:

*In the case of the land leased by GCAPL immediately south of the Airport, the land is classified as "Deferred Matter" so as to not preclude development of aeronautical facilities.*

This sentence should be removed in its entirety.

Land under the Tweed Local Environmental (standardised) Plans' describing land that is "deferred matter" is land excluded as a result of the NSW Government's review of environmental protection zones on the Far North Coast. Consequently the comment in the opening of that paragraph to the effect that there is no specified zoning is also incorrect, but of much less concern. It is recommended that the entire paragraph be reviewed and corrected or deleted in its entirety.

The last sentence in the third paragraph to page 21 is also problematic as it serves no purpose, stating that '*Zoning within the Tweed Shire.*' as it reads as being incomplete.

Further, the discussion regarding the legislative framework covering the Tweed would be more complete if it was to also address the associated mapping overlays and provisions under the *Tweed Local Environmental Plan 2014*, including the sites affectation by Acid Sulfate Soils (ASS) as well as Flooding information.

Lastly, there is a brief discussion of the *North Coast Regional Plan 2036* (NCRP) that would have benefited from a more detailed focus and discussion of the NCRP '*Direction 5.2 Expand the region's aviation services*' and particularly having regard for the relationship and role of the airport within the wider Gold Coast and Tweed Heads localities from a general economic, tourist, global freight and transport perspective.

3. Section 5.2 of the Hotel Plan outlines the key stakeholders to be consulted.

Tweed has recently exhibited a draft Aboriginal Cultural Heritage Management Plan (ACHMP) which identifies areas of known and predictive cultural heritage. It outlines consultation and assessment requirements with respect to the management of Aboriginal cultural heritage.

While the proposed development is situated within Queensland the spatial occurrence and understanding of culture and its significance and relationship knows no such artificial boundary. It is well documented and widely known that the airport land contains a significant number of registered Aboriginal objects and is situated within sensitive traditional Aboriginal landscape.

The earlier *Airport Master Plan 2017*, Section 11.10 'Cultural Heritage' contains objectives and targets for encouraging ongoing proactive consultation with the Aboriginal community and management of cultural heritage as part of the development process.

The Hotel Plan, s 6.10 'Cultural Heritage' similarly provides discussion of cultural heritage known to be in existence on the airport land however, it does not appear to acknowledge or provide any discussion of the relevance of the fourteen cultural sites listed on the NSW Aboriginal Heritage Information Management System (AHIMS) and that are located within 1 kilometre of the surrounding area.

Given the locality has extensive Aboriginal cultural heritage significance and is part of a broader traditional cultural landscape that extends also into the Tweed, the potential for cultural heritage sites or artefacts to be found on the hotel site should be reported and assessed within this broader landscape. This would likely require that the Hotel Plan include actions, such as, cultural heritage awareness training or induction for all staff and contractors working on the site and the need for a clear practice manual for stop work procedures in the event that cultural heritage is revealed during works on the new development.