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Gold Coast Airport 2017 Master Plan: Submission from Tweed Shire Council

Tweed Shire Council welcomes the opportunity to comment on the Preliminary Draft Gold Coast Airport 2017 Master Plan.

Expansion of the Airport is seen as testimony to both the management of the facility and the popularity of the Tweed and Gold Coast as places to live, holiday or do business.

While Council is supportive of initiatives to improve the ability of the Airport to meet growing demand it is in our view inevitable that such significant increases in passenger jet numbers will impact on Tweed residents. We feel it is the Council's responsibility therefore to articulate the concerns for both current and future residents and to ensure that the important attributes which make our area such an attractive destination are adequately aired and protected.

- 1. Tweed Council acknowledges the marginal change in the ANEF Contours illustrated between the current and proposed contour lines and the well understood fact that it is not a precise science or means for determining and describing areas that are or are not affected by aircraft noise. That despite the fundamental status quo to 2047 in the "boundary area" affected, those residents living within and adjacent to it will be adversely and substantially affected by the significant increase in traffic volume, as illustrated in the N70 mapping.***
- 2. Notwithstanding any contention that there will not be an increase in aircraft noise on Tweed residents more generally there is a growing number of residents from many parts of the Shire that are raising concern both regarding noise and increase in occurrence, raising doubt as to the accuracy or scientific base for anything to the contrary.***

While the principal role of the Master Plan is to address development requirements for the next five years, consistent with the design concepts presented in the 20 year strategic plan, the Master Plan is a key document for the community, business and government in understanding and responding to short term actions and preparing for longer term more strategic implications.

We understand that the focus of the Master Plan is the continued expansion of the terminal to accommodate an increase in passenger numbers, and improvements to vehicle and aircraft movements, which will influence landuse planning policies in Tweed Shire.

Along with the projected increase in passenger numbers to 16.6 million by 2037 will come a range of impacts that Council and GCAPL will need to address at the earliest possible stages to ensure that the ability of the Airport to grow and meet the projected demands is considered through the strategic landuse planning framework where at all possible.

The Tweed Community has been vocal in expressing concerns about the potential impact of increased aircraft movements, changes to flight paths, the runway landing threshold, and environmental and Aboriginal cultural heritage issues which have previously been raised with Gold Coast Airport Pty Ltd (GCAPL).

Council's ability to work with GCAPL to implement a strategic approach to land use planning and management of land affected by Airport operations, with the purpose of minimising potential negative impacts of longer-term expansion, is pivotal in providing the local Tweed community with an understanding of how growth of the Airport will impact them personally, and minimise concerns about the future.

To further assist Council in the short term to both the 2047 ANEF and N70 contours are an important addition to its mapping catalogue, it would be appreciated if the digital data could be made available at the earliest opportunity to ensure that any assessment of planning proposals or development applications are able to accommodate this latest information.

- 3. Expansion of the airport cannot continue to proceed in a vacuum to the external impacts and costs to the broader Tweed community, without taking responsibility for some of that impact or the cost of ameliorating it, as would be the case with any other development with external impacts beyond its land boundary. At a minimum, if the expansion is to occur, the Gold Coast Airport Limited should be contributing financially to the long-term strategic land-use planning that will be required as a means of both abating the intensification of poor living environments attributable to aircraft noise, relieving landowners' whose lands are sterilised by planning regulation aimed at protecting the airport to their own detriment through land sterilisation and expensive acoustic building insulation measures, but also to help in the transition of land, where the community desires, away from uses that give rise to such complaints to a use that can actually contribute to and benefit from the economic / employment opportunities the airport expansion will generate. GCAPL is request to commit an adequate financial commitment to a strategic land-use planning study for land immediately south of the Airport generally bounded by the ANEF contours.***

As one of the largest employers in the Tweed Shire, which also provides significant economic contribution to local and regional industries and business enterprises, Council is keen to work with GCAPL and Gold Coast City Council in identifying opportunities to secure ongoing economic benefits to local residents and businesses

through the development of employment generating activities on land in close proximity to the Airport.

The development of additional transport infrastructure is welcomed, and expected to support greater integration of development opportunities surrounding the Airport. In particular, the draft Master Plan proposes construction of a second access onto the Gold Coast Highway. Such access would provide an opportunity to develop land east of the Highway for employment opportunities within fields such as technology, education, research, logistics, aviation and health services, and establish a node for high end employment opportunities.

Introduction of heavy and light rail facilities is also seen as positive for facilitating movement of both goods and passengers and will have broader implications for movement throughout the region, and is supported. Any potential benefits of extension of light rail into the Tweed are matters that can be discussed in future joint meetings between Council and GCAPL.

- 4. Council notes the airport's expansion will have significant economic benefits for the broader regions of NSW and Qld. In particular the growth of passenger numbers resulting from the expansion to meet demand at this location will have a direct effect on the demand for developments elsewhere to meet that demand also, and will invariably increase demand and pressure on infrastructure authorities to build, replicate and augment those systems. By its very nature the expansion of the Airport has adverse economic effects for providers of such services, and while those authorities like that of Tweed Council see the benefits to its community from the economic stimulus the airport will deliver it also feels the financial pressure of delivering services to meet that demand, without assistance from Airport. While Council is respectful of the statutory approvals process for the Master Plan and the limitation with seeking any form of compensation, it would nonetheless be remiss of Council if a request for funding a local transport study to investigate options for a light rail network into Tweed was not made. Such a study, and subsequent future infrastructure network, would have significant benefits for the Airport directly, tourists generally, and is seen also as more environmentally sustainable transport option for the long-term future of our region.**

While installation of a high-intensity approach lighting system at the southern end of Runway 32 on land leased from the NSW Government is acknowledged, please be advised that this system is likely to require development approval under the *Environmental Planning and Assessment Act 1979*.

We acknowledge that GCAPL has in place measures to manage potential impacts on sites and areas of Aboriginal cultural heritage significance, and is aware of the cultural significance of the Airport site. Tweed Shire Council is currently preparing a Shire-wide Aboriginal Cultural Heritage Management Plan which will identify heritage sites or items, or where there is a high likelihood of their presence. As such, GCAPL is encouraged to maintain close liaison with the local Aboriginal community and Council regarding this matter.

- 5. Council notes that extensive ground disturbance as part of the Airport's expansion works presently occurring and that has revealed a very large quantum and significance of Aboriginal cultural heritage material, despite there being no prior identification of such in the approval's application material. This is a significant concern for the broader community and there is a real likelihood of a similar occurrence if further works are undertaken. Council urges the GCAPL to ensure that best practice comprehensive survey of cultural heritage is undertaken with the local Aboriginal stakeholders prior to any further approvals being sort or additional works commenced.**

Council's submission in response to the public exhibition of the Preliminary Draft Major Development Plan July 2015 the significance of native vegetation on the site and desire to see as much of this protected as possible was raised. While it is noted that the majority of vegetation has since been removed, Council's previous advice remains current. In addition, the following comments are provided in relation to further matters raised in this current Preliminary Draft Master Plan:

Vegetation to be retained is of high ecological significance, and includes threatened communities, habitat for numerous threatened plants and animals and serves for landscape connectivity purposes and as such, the biodiversity management targets proposed are supported and considered a critical minimum commitment to the significant ecological values of the site.

As raised in previous submissions made by Council, developments such as the ILS have already been identified as compromising the ability to appropriately protect and improve the Cobaki Environmental Precinct.

- 6. It is proposed that no further direct or indirect impacts should occur in the Cobaki Environment Precinct and appropriate ongoing monitoring and evaluation should be undertaken to verify the desired outcome of improvement in the ecological condition of this precinct.**

It is noted that there is no commitment to protect the existing Environmentally Significant Areas (ESAs); however, given the identified major, adverse and irreversible impacts to the high ecological values of state, national and international significance resulting from the ILS and Project Lift, protection of these ESAs as part of the ongoing development of the airport would provide certainty regarding the future of this significant ecosystem.

- 7. It is proposed that a commitment to maintain the remaining ESAs as shown in Figure 11.4 is provided.**

Offsets are seen as an important component of maintaining a net environmental benefit locally, within Tweed Shire, which should be proposed at offset ratios that are consistent with those applied locally.

8. ***It is proposed that any outstanding offset commitments are applied in accordance with the following fundamental offsetting principles:***
- ***No net loss;***
 - ***Additionality of conservation outcomes;***
 - ***Adherence to the mitigation hierarchy (avoid, mitigate, offset);***
 - ***Offsets achieved within a meaningful timeframe of no more than 20 years;***
 - ***Biodiversity values of the offset must closely approximate at regional, landscape and local scales the values being affected by a development;***
 - ***Offsets shall be built around direct offsets which do not result in a net loss of habitat;***
 - ***The design and implementation of a biodiversity offset should secure the required biodiversity outcomes in perpetuity;***
 - ***Offsets must be managed, transparent and enforceable;***
 - ***The design and implementation of a biodiversity offset should be a documented process informed by sound science and incorporate the precautionary principle in the absence of scientific certainty, and***
 - ***Offset strategies must be determined and preferably commenced implementation prior to the relevant impact.***
9. ***It is proposed that a commitment to maintaining and improving the existing Environmentally Significant Areas in the Western Enterprise Precinct and the potential for additional use of this precinct for environmental purposes be included in the Master Plan. Such a commitment would ensure that any future land use of this precinct does not have direct or indirect impacts on the Cobaki Environmental Precinct.***

The draft master plan recognises the potential for airport operations to impact on the Cobaki Broadwater, a significant and recognised coastal system.

10. ***Operations within Gold Coast Airport should not result in any negative environmental impact to the water quality, hydrology or aquatic ecology values of the Cobaki Broadwater.***

Growth in passenger numbers and other operations of the airport have brought both benefits and difficulties which have impacted upon the ability of Council to respond appropriately and in a timely manner. The potential for considerable further expansion of the airport has heightened the desirability of working more closely with GCAPL to facilitate better strategic landuse planning and advice to the community. For example, a clear understanding of the Ultimate Practical Capacity of the airport and the associated ANEF contours would assist in better understanding and planning for the long term expansion of the airport. A regular meeting, perhaps twice a year could facilitate such an outcome.

- 11. *It is proposed that Council meet with GCAPL on a regular basis to facilitate a better understanding of the implications of the ongoing expansion of the airport, and the ability of Council to respond accordingly through its landuse planning and community obligations.***

Council both acknowledges the need for ongoing expansion of the Gold Coast Airport services and facilities and supports initiatives which will bring improvement economic outcomes, protects environmental and culturally significant site and areas, and looks forward to working closely with GCAPL in the securing of these outcomes through the implementation of the Master Plan.

Should you have any further queries please do not hesitate to contact Iain Lonsdale, Unit Coordinator, Strategic Planning & Urban Design, in the first instance.

Yours faithfully

Vince Connell
DIRECTOR PLANNING & REGULATION