

Tweed Shire Council
Public Consultation and
Submissions

2009

Introduction

Tweed Shire Council regards public consultation as vital to the process of preparing planning documents. It is mandatory to undertake community consultation when preparing a Local Growth Management Strategy. Often public submissions are made and addressed, but then become separated from the original document. As time passes it is difficult to remember what matters were raised and why they did or did not result in change. In finalising the Tweed Employment Lands and Urban Land Release Strategies it was agreed that all written submissions to the exhibited strategies will be summarised and included as part of the document.

Public consultation associated with the Tweed Strategies

- ▶ Advertisements were placed in the Tweed Link newspaper in mid 2007 advising that Strategies were being prepared and asking for expressions of interest from any landowners that consider their land may suitable for urban or employment use;
- ▶ Interviews were held with those who expressed interest in their land being included in the Strategies;
- ▶ A group workshop was held with key state government representatives about their expectations for the Strategies;
- ▶ Draft Urban Land Release and Employment Lands Strategies were prepared and potentially affected landowners were contacted by letter. Group consultation workshops were held with landowners in late 2007.
- ▶ The draft Urban Land Release and Employment Lands Strategies were revised based on this feedback. They were considered by Council in early 2008;
- ▶ The revised draft Strategies were exhibited for public comment from 7 May – 27 June 2008 at the following locations:
 - Tweed Shire Council Head Office, Murwillumbah;
 - Tweed Shire Council Website.
- ▶ Advertisements were placed in the Tweed Link newspaper and affected landowners were advised by letter.

Exhibition Period Submissions

During the exhibition period, 76 submissions were received from individuals, groups and government departments. All submissions have been summarised, considered and actions recommended for each issue raised.

The submissions were received from a range of respondents including: private landowners, government agencies and corporations and covered the following general topics:

- ▶ land that should be included in the strategies;
- ▶ land that should be excluded from the strategies;
- ▶ concern regarding the process of preparing and exhibiting the strategies; and
- ▶ concern regarding specific issues such as the timing of potential release areas, data that was used or the particular terminology that was included.

Government Departments that made submissions included the Department of Lands and the Department of Environment and Climate Change.

Table 11-1 Land nominated for inclusion in the Strategies

Land nominated for inclusion in the Strategies				
	Issue	Description	Planning Comment	Action
1.	General	<p>The DoL is the largest landholder in the Tweed Shire and will contribute significantly to the social, economic and environmental future of the Tweed Shire.</p> <p>The DoL is investigating a number of other sites on Crown land for industrial, commercial, tourism and recreational development.</p>	<p>Comment is noted. Tweed Shire Council (TSC) considered all land in the multi criteria analysis to establish which lands meet Council's criteria. TSC understands the role of DoL within the Shire.</p>	No change recommended.
	Airport Precinct (Area 1) <i>Employment Lands Strategy (ELS)</i>	<p>DoL supports Area 1 for industrial land release. It suggests this land should be given short-medium term release.</p> <p>Environmental constraints on this land need to be considered carefully.</p> <p>This precinct has enormous potential for development in the short to medium term.</p> <p>Area 1 & 2 has potential for a wide variety of employment development uses including business park precinct, airport and export related industries.</p>	<p>Area 1 has been identified as a medium term release area in the Strategy.</p> <p>A medium term timeframe has been recommended in the strategy based on demand assumptions and how supply of employment lands will diminish in the future.</p> <p>The strategy should be reviewed every five to seven years to check whether areas were developed as expected and to assess any changes in demand of services and infrastructure.</p> <p>Other submissions have questioned the suitability of Area 1 due to environmental issues and airport imposed restrictions on building height etc. Notwithstanding the DoL support for Area 1 it is recommended that it be removed from the Strategy.</p>	Remove Area 1 from the ELS
	Boyd Street Overpass <i>ELS</i>	<p>DoL suggests that some land may be suitable for release in the Boyd St overpass area to capitalise on the new Tugun Bypass, future rail and the Gold Coast Airport Western Enterprise Precinct.</p>	<p>This lot has not been identified in the <i>ELS</i> due to the assessment criteria used.</p>	No change recommended.
2.	Lot 13 DP 842857, Keilvale <i>Urban Land Release Strategy (ULRS)</i>	<p>This lot is not included in the draft Strategy and should be considered as possible urban expansion area.</p> <p>Lot currently has 3 zonings, including a residential zone.</p>	<p>This lot has not been identified in the <i>ULRS</i> due to the assessment criteria used. However, the site is adjacent to Area 1 and it may be considered in the master planning process for that locality.</p>	No change recommended
3.	Lot 2 DP 589967, Gray Street, West Tweed <i>Area 2 ELS</i>	<p>Supports the rezoning of this land to light industrial.</p>	<p>This lot is already identified in the ELS and is in the south east corner of Area 2. It is in an area that is most distant from the Gold Coast Airport and most distant from the Cobaki Broadwater. It is recommended that it remain in the Strategy.</p>	No change recommended
4.	Lot 2 DP 231691 (Burringbar) <i>ULRS</i>	<p>Part of this lot should be included as a site for urban release in the <i>Urban Land Strategy</i>. The southern part of this lot is currently zoned residential.</p>	<p>This lot has not been identified in the <i>ULRS</i> due to the assessment criteria used. However, as the land is adjacent to Area 8 it may be considered for the master planning process for that locality.</p>	No change recommended
5.	Mooball <i>ULRS</i>	<p>Concerns that there is a shortfall in urban land release areas. 935 ha are identified as the shortfall across both vacant subdivided land and land yet to be granted subdivision approval. This shortfall is based on the assumption that zoned land at Cobaki Lakes and Kings Forest will not produce residential land in the short to medium term.</p> <p>Concerned that Council has decided to rely on existing zoned areas rather than investigate Greenfield sites. Disagree with Council's adoption of urban consolidation and existing zoned land (11.3) as its preferred growth option.</p>	<p>The methodology for estimating the potential supply of urban land from existing zoned areas is outlined in the ULRS.</p> <p>If the figures overestimate the supply this can be addressed at a later review of the Strategy. There is no reason to assume that Cobaki Lakes and Kings Forest will not produce residential land in the short to medium term.</p> <p>Council was presented a range of options in the draft ULRS and opted to focus on zoned areas and increased densities (11.3). The recommended option was to rely on existing zoned areas, promote urban consolidation and identify and release Greenfield sites in the short, medium and long term. Given the need to have a strategy that looks beyond existing zoned land this option (11.5) is still preferred.</p>	It is recommended Council re-visit its decision on major directions for urban land development and adopt 11.5 of the <i>ULRS</i> as its preferred position.

Land nominated for inclusion in the Strategies				
	Issue	Description	Planning Comment	Action
6.	Duranbah (Area 4) <i>ULRS</i>	There is a request for the property: 63 Duranbah Rd, Duranbah, to be listed as a 'short term' timeframe for development rather than a 'long term' timeframe in the <i>ULRS</i> .	Area 4 has been identified as a long-term release area based on demand assumptions and how the supply of urban lands is predicted to diminish in the future. It also takes into consideration the large areas of land that are already zoned for residential purposes. The strategy should be reviewed every five to seven years to check whether areas were developed as expected and to assess any changes in demand of services and infrastructure. Timing of land release can be re-assessed at this time.	No change recommended
7.	Lot 1 DP 1062132 (Duranbah Road Duranbah) <i>ULRS</i>	This lot should be included as an urban release area in the <i>ULRS</i> Request that Council investigate further potential urban release areas to meet the shortfall in land supply for the <i>ULRS</i> The area to the south and west of Kings Forest should be investigated as potential urban release areas.	This lot has not been identified in the <i>ULRS</i> due to the assessment criteria used. However, as the property is adjacent to Area 4 it may be considered for the master planning process for that locality.	No change recommended
8.	Lot C, DP 930683 and Lot D, DP 930 684 (Kielvale area) in Area 1 <i>ULRS</i>	These lots should be included in <i>ULRS</i> . Suggest that Area 1 should be released as a 5-10 year time frame, rather than 20 years. This area is central to major transport routes to the north and south and possibilities to the east.	The identified lots have been included in Area 1 in the <i>ULRS</i> . Area 1 has been identified as a long-term release area based on demand assumptions and how the supply of urban lands is predicted to diminish in the future. It also takes into consideration the large areas of land that are already zoned for residential purposes. The strategy should be reviewed every five to seven years to check whether areas were developed as expected and to assess any changes in demand of services and infrastructure. Timing of land release can be reviewed at this time.	No change recommended
9.	Lot 1, DP 1073137 (Kielvale – Wardrop Valley area) <i>ULRS</i>	This lot should be included in the <i>ULRS</i> . This parcel of land was included in the previous proposed urban land release and there is no reason why it should be taken out. The lot is suitable for urban development due to a number of reasons such as being flood free, clear of vegetation, appropriate access and proximity to the town centre.	This lot was not identified in the <i>ULRS</i> due to the assessment criteria used. However, the property is adjacent to Area 1 and may be considered in the master planning process for that locality. Area 1 is a general locality that builds on the existing residential zone at Kielvale. Although the 1992 Strategy was a consideration it was not the "starting point" for any of the areas identified in the draft <i>ULRS</i> . The land suitability assessment process is intended to be a "fresh look" at potential urban areas and is explained in the draft document.	No change recommended
10	Lot 9 DP 583345 Kielvale (near Area 1) <i>ULRS</i>	The greater part of Lot 9 DP 583345 should be included in the proposed future Kielvale release area. A more infrastructure efficient urban perimeter should be investigated. The strategy should review the following aspects in relation to this parcel of land: Excessive urban perimeter vs. area, Incorrect agricultural protection identity, Non-viable residual lands, Potentially inefficient urban infrastructure servicing, and Possible under provision of agricultural and bushfire buffering which may impact on target yields.	The northern most part of this lot (approximately 20% of its area) is currently zoned 2(d) Village under Tweed LEP 2000. Subject to service infrastructure thau land can already be developed if the owner chooses to do so. The balance of the lot has not been identified in the <i>ULRS</i> due to the assessment criteria used. The points raised in this submission in relation to urban perimeter and residual agricultural lands will have to be considered more closely if the subject land is developed in conjunction with the neighbouring village zoned lands.	No change recommended

Land nominated for inclusion in the Strategies

Issue	Description	Planning Comment	Action
11. Request that Lot 1 DP1026551, Lot 1 DP124646 and Lot 2 DP828280 be included in the Burringbar and Mooball villages <i>urban areas</i> <i>ULRS</i>	A large proportion of Lot 1 in DP 1026551 has been excluded from consideration because it is regionally significant farmland. This should not be a restriction to urban expansion.	This lot has not been included in the <i>ULRS</i> due to the assessment criteria used. Regionally significant farmland is not an absolute constraint, but the conditions that must be complied with to justify its inclusion in a strategy are extremely difficult to achieve. A number of areas were considered initially but landowner reaction at a consultation meeting was strongly in opposition to significant expansion of the urban area of Burringbar.	No change recommended
12. Lot 6 DP 524303 Murwillumbah <i>ULRS</i>	This lot should be included in the <i>ULRS</i> as a potential urban release area with a short term rezoning timeframe (0-10 years).	This lot has not been included in the <i>ULRS</i> due to the assessment criteria used.	No change recommended
13. Tweed Valley Industrial Park - Area 5 and Area 6 <i>ELS</i>	Area 5 – Wardrop Valley West. Request that additional land be included in Area 5. Request that the 'long term' status change to a 'short term' status. Area 6 – this area is supported for inclusion in the strategy.	Area 5 was defined by the assessment criteria used in the ELS, but the areas nominated are adjacent to it and may be considered in a future master planning process. Area 5 has been identified as a long-term release area in the Strategy, based on demand assumptions and how the supply of employment lands is predicted to diminish in the future. The strategy should be reviewed every five to seven years to check whether areas were developed as expected and to assess any changes in demand for services and infrastructure. Area 6 is recommended to be developed before Area 5 because of its proximity to the existing industrial areas as well as access to services and access off Wardrop Valley Road.	No change recommended.
14. Bilambil Heights <i>ULRS</i>	Request that the <i>ULRS</i> identifies the 6(b) zoned land at Pacific Highlands to be rezoned to 2(c) with a short-term status. Amend the strategy to include the additional 18.35 ha of land within Pacific Highlands as potential urban release area. Amend the strategy to be consistent with the urban footprint shown in the Draft Bilambil Heights Local Area Structure Plan with a short-term timeframe.	Land zoned for open space purposes was regarded as already being within the urban footprint and was not typically considered for inclusion in the <i>ULRS</i> . Changing open space land to a residential zone needs to be based on an analysis of the supply and demand for open space in the locality as well as the suitability of the land for residential use. The Draft Bilambil Heights Local Area Structure Plan is not a Council endorsed document and is not currently publicly available. A State significant site application has been made by the landowners and the site is also subject to a Part 3A application for an urban concept plan. Both are processes beyond the scope of this Strategy.	No change recommended.
15. Lot 21 DP 518902 and Lot 644 DP 755740 (Area 3) <i>ELS</i>	Area 3 (the Border Park Raceway) is supported as being in the strategy however it is recommended to be in the short-term timeframe not the medium term. This is to allow for lead times for rezoning, obtaining development approvals and construction.	A medium term timeframe was recommended in the draft strategy based on demand assumptions and how the supply of employment lands is expected to diminish in the future. However, this submission points out that the future viability of the current use of this site will be decided within the next ten years and if its not able to be rezoned for employment purposes then it may be lost as a supply opportunity. Accordingly it has been brought forward into the short term time frame. The strategy should be reviewed every five to seven years to check whether areas were developed as expected and to assess any changes in demand of services and infrastructure.	It is recommended that Council consider this site as a short term option for rezoning for employment lands in the ELS.

Land nominated for inclusion in the Strategies				
	Issue	Description	Planning Comment	Action
16.	Lot 4 DP 747359, (Upper Burringbar Road, Burringbar) <i>ULRS</i>	This lot should be included in the <i>ULRS</i> . More specifically, the southern parts of the site, which are not mapped as regionally significant farmland.	This lot has not been identified in the <i>ULRS</i> due to the assessment criteria used. A number of areas were considered initially but landowner reaction at a consultation meeting was strongly in opposition to significant expansion of the urban area of Burringbar.	No change recommended
17.	Lot 10 DP 1084319 (Area 2) <i>ELS</i>	This lot should be allocated as short term rather than medium term. This is requested to assist with the commencement of the rezoning process. Reasons for change in time allocation are: Demand for industrial land; Lead times for rezoning, development approvals and construction; and Improved access for industrial development due to completion of Tugun Bypass.	A medium term timeframe has been recommended in the strategy based on demand assumptions and how supply of employment lands will diminish in the future. The strategy should be reviewed every five to seven years to check whether areas were developed as expected and to assess any changes in demand of services and infrastructure. This timeframe has taken into consideration the lead times for the rezoning process.	No change recommended
18.	Lot 8 DP 867005 (Pottsville) <i>ULRS</i>	This lot has an area of 4.14 ha and should be included as a potential release area in the <i>ULRS</i> . This site is predominately grassland. The consultant thinks that it may be partly in the Far North Coast Regional Strategy.	This rural residential lot has not been identified in the <i>ULRS</i> due to the assessment criteria used. The lot is north of the area identified in the Far North Coast Urban Strategy for urban development. It is definitely not in the Far North Coast Urban Strategy. Rural residential areas have historically yielded very poor urban residential outcomes due to disjointed land ownership and the inappropriate location of infrastructure and dwellings. Council considered the option of increasing densities in rural residential areas as part of the <i>ULRS</i> , but decided not to do so at this stage.	No change recommended
19.	Lot 7 DP 874934 (West Murwillumbah) <i>ULRS</i>	This lot has an area of 27.4 ha and should be included as a potential release area (as Part of Area 3) in the <i>ULRS</i> . This site is adjacent to Areas 2 and 3 and is relatively unconstrained.	This lot has not been identified in the <i>ULRS</i> due to the assessment criteria used. However, as it is adjacent to Area 3 it may be considered for the master planning process for that locality.	No change recommended
20.	Lot 1 DP 706163 (866 Pottsville Road, Pottsville) <i>ULRS</i>	The identified lot should be included as a potential urban release area in the <i>ULRS</i> . The lot is relatively unconstrained and this inclusion would make it consistent with the Far North Coast Regional Strategy..	Rural residential areas have historically yielded very poor urban residential outcomes due to disjointed land ownership and the inappropriate location of infrastructure and dwellings. This lot was not identified in the <i>ULRS</i> because of its current use. However, it is noted that the land is in the Far North Coast Regional Strategy and in the draft Pottsville Locality Plan. In the interests of consistency it should be included in the <i>ULRS</i> so that it can be considered along with other lands in the vicinity in any future master planning.	It is recommended this land be added to Area 7 of the <i>ULRS</i> .
20a.	Lot 2 DP 706163 (854 Pottsville Road, Pottsville) <i>ULRS</i>	The identified lot should be included as a potential urban release area in the <i>ULRS</i> . The lot is relatively unconstrained and this inclusion would make it consistent with the Far North Coast Regional Strategy..	Rural residential areas have historically yielded very poor urban residential outcomes due to disjointed land ownership and the inappropriate location of infrastructure and dwellings. This lot was not identified in the <i>ULRS</i> because of its current use. However, it is noted that the land is in the Far North Coast Regional Strategy and in the draft Pottsville Locality Plan. In the interests of consistency it should be included in the <i>ULRS</i> so that it can be considered along with other lands in the vicinity in any future master planning.	It is recommended this land be added to Area 7 of the <i>ULRS</i> .

Land nominated for inclusion in the Strategies				
	Issue	Description	Planning Comment	Action
20b.	Lot 2 DP 248704, Lot 2 DP 592115, Lot 5 DP 840977 and lot 1 DP 248704 (834 Pottsville Road, Pottsville) <i>ULRS</i>	The identified lots should be included as a potential urban release area in the <i>ULRS</i> . The lot is relatively unconstrained and this inclusion would make it consistent with the Far North Coast Regional Strategy..	Rural residential areas have historically yielded very poor urban residential outcomes due to disjointed land ownership and the inappropriate location of infrastructure and dwellings. These lots were not identified in the <i>ULRS</i> because of their current use. However, it is noted that the land is in the Far North Coast Regional Strategy and in the draft Pottsville Locality Plan. In the interests of consistency it should be included in the <i>ULRS</i> so that it can be considered along with other lands in the vicinity in any future master planning.	It is recommended this land be added to Area 7 of the <i>ULRS</i> .
21.	Lots 2 and 3 DP 1077990 (South Tweed Heads) <i>ELS</i>	The identified lots should be included as potential employment land in the <i>ELS</i> .	These lots have not been identified in the <i>ELS</i> due to the assessment criteria used. Lot 2 is already identified for employment land (zoned 4(a) industrial). Lot 3 has environmental constraints and is zoned 6(b) Recreation. Land zoned for open space purposes was regarded as already being within the urban footprint and was not typically considered for inclusion in the <i>ELS</i> . Changing it to an employment zone needs to be based on an analysis of the supply and demand for open space in the locality as well as the suitability of the land for employment purposes.	No change recommended
22.	Lot 22 DP 1058759 and Lot 4 DP 876253 (Clothiers Creek Road, Bogangar) <i>ULRS</i>	The identified lots should be included as a potential urban release area in the <i>ULRS</i> . This land was identified in the 1992 Residential Development Strategy and in the Far North Coast Regional Strategy .	These lots have not been identified in the <i>ULRS</i> due to the assessment criteria used. The respondent advises that in January 2007 Council rejected the subject land for residential development, primarily because of flooding issues. If these issues can be resolved then parts of the land may be considered for inclusion in a future review of the <i>ULRS</i> . Lot 22 is a large lot that spans both sides of Clothiers Creek Road. Lot 4 is entirely located on the north side of Clothiers Creek Road and is already partly zoned for residential purposes.	No change recommended.
23.	Lot 33 DP 1073293 (Kirkwood Road, Tweed Heads South) <i>ELS</i>	The identified lot should be included as a potential employment land area with a short-term designation for rezoning. This lot is 18.02 ha and is identified in the Far North Coast Regional Strategy as "within" existing urban footprint.	Lot 33 has environmental constraints and is zoned 6(b) Recreation. Land zoned for open space purposes was regarded as already being within the urban footprint and was not typically considered for inclusion in the <i>ELS</i> . Changing it to an employment zone needs to be based on an analysis of the supply and demand for open space in the locality as well as the suitability of the land for employment purposes. The identified lot has not been identified in the <i>ELS</i> due to the assessment criteria used.	No change recommended
24.	Kielvale (Area 1) <i>ULRS and ELS</i>	East Kielvale urban release area in the <i>ULRS</i> should not be purely residential, but instead allow for a mixed-use master-planned community. This area should also be prioritised for development in the short to medium term. Recommend that Council consider the benefits of master-planned communities, the importance of boundary definitions, the timeframes for urban release and critical employment linkages.	Agree that master planned communities that allow for mixed uses are important. This is stated in Chapter 13 of the <i>ULRS</i> . It is expected that Area 1 would not be a purely residential development in the long term. Area 1 was defined by the assessment criteria used in the <i>ULRS</i> , but areas nominated that are adjacent may be considered in a future master planning process. Timing of any release is an issue that can be revisited when the <i>ULRS</i> is next reviewed.	No change recommended

Land nominated for inclusion in the Strategies				
	Issue	Description	Planning Comment	Action
25.	Lots 1&2 in DP 815370 (Pottsville Mooball Road, Pottsville) <i>ULRS</i>	The identified lots should be included in the <i>ULRS</i> . The respondent understands that this land is not included due to environmental constraints. The land sits adjacent to the Seabreeze residential estate and on the western perimeter of the Pottsville village centre. The site has access to public infrastructure and any development would dedicate buffers to required areas.	These lots have not been identified in the <i>ULRS</i> due to the assessment criteria used. The land parcel has an extended frontage to the south side of the Pottsville/Mooball Road and is extensively affected by a SEPP 14 wetland.	No change recommended
26.	Lot 3 DP 719692 and Lot 13 DP 726470 (McCollums Road, Cudgen – Area 4) <i>ULRS</i>	Part of the identified lots have been included as part of Area 4 in the <i>ULRS</i> . The respondent has requested that all of the land is to be included as potential urban release area. The whole site is 27.2 ha and has frontages to both McCollums Rd and Cudgen Rd.	This lot was partly identified in the <i>ULRS</i> due to the assessment criteria used. The balance of the property would be considered in the master plan for that locality.	No change recommended
27.	West Kingscliff <i>ULRS</i>	The respondent advises that there is approximately 62 ha of vacant land currently zoned 2(c) in the West Kingscliff Urban release area described in Table 7.2..	Agreed	Amend Table 7.2 of the <i>ULRS</i> to reflect 62 ha (gross) at West Kingscliff (not 47 ha)
28.	Chinderah – Proposed business park <i>ELS</i>	The proposal is to develop a business park at Chinderah on a 96.5 ha site with Pacific Highway frontage (site shown in submission). The concept is supported by the Far North Coast Regional Strategy . 'Opportunity for integrated master planned estates and business technology parks' was acknowledged but no specifics identified in the <i>ELS</i> .	These lots have not been identified in the <i>ELS</i> due to the assessment criteria used. The concept of identifying a large site as suitable for a Business Park is supported, but it needs to be a site that meets the land suitability criteria used by Council and supported by the State government. The Far North Coast Regional Strategy supports the concept but does not specifically nominate the site.	No change recommended
29.	119-121 Tweed Coast Road Lot 14 DP 871062 <i>ULRS</i> <i>ELS</i>	Subject property should be included within the <i>ULRS</i> given its proximity to existing urban footprint with suitable infrastructure nearby.	This lot has not been identified in the <i>ULRS</i> or <i>ELS</i> due to the assessment criteria used.	No change recommended.
30.	Land in vicinity of Hindmarsh Road, Keilvale Lot 22 DP 860153 Lot 3/582718 Lot 189/DP755698 Lot C/DP930683 Lot D/DP930684 <i>ULRS</i>	Subject properties should be included within strategy for release. Past history of rezoning by the Council (TLEP 1987 Rural 1(c) to Rural 1(a) and Land included within the Draft Tweed Shire Council Residential Development Strategy of the 1980's.	The properties are currently included within Area 1 of the Urban Land Release Strategy. It is recommended that these lands remain within the strategy.	No change recommended.
31.	771 Cudgen Road, Cudgen Lot 102 DP 870772 <i>ULRS</i>	Critical of the 'constraints mapping / sieving' with only constraints or negatives mapped. Strategy does not consider liveability of sites. Sites identified for inclusion have bad microclimate which inevitability results in unsustainable development. Subject land no longer suitable for agricultural production given size of land holding, surrounding zones and land uses and on site topography. Council has acquired land further diminishing productivity. Land suitable for sustainable residential forms.	This lot has not been identified in the <i>ULRS</i> or <i>ELS</i> due to the assessment criteria used. TSC considered all land in the multi criteria analysis to establish which lands meet Council's criteria. It is agreed that constraints mapping focuses on the limitations to a site and not its more positive attributes in terms of liveability. However, it is ultimately the constraints to a site that limit its development capability (and yield) and affect the cost of infrastructure.	No change recommended

Land nominated for inclusion in the Strategies				
	Issue	Description	Planning Comment	Action
32.	84 Reserve Creek Road, Keilvale Lot 2 DP 605594	Subject land is in the vicinity of Area 1 ULRS therefore is appropriate for inclusion and could simultaneously benefit from infrastructure which would service Areas 5 and 6 of the ELS. There is existing residential zoned land in the vicinity.	This lot has not been identified in the <i>ULRS</i> or <i>ELS</i> due to the assessment criteria used.	No change recommended.
33.	Landowners of properties within Cudgen	Objection to the ULRS and its omission of subject properties. Objection to adoption of NSW State Government Regional Farmland Protection Project as criteria for constraint mapping. Lands should be included given viability, supply/demand, unsuitability for current farming practices, availability of infrastructure and services.	These lots have not been identified in the <i>ULRS</i> or <i>ELS</i> due to the assessment criteria used. These sites are classed as State Significant Farmland a significant constraint to the development of land which restricts inclusion of land as potential urban or employment land release. Regionally significant farmland is not an absolute constraint, but the conditions that must be complied with to justify its inclusion in a strategy are extremely difficult to achieve.	No change recommended.
34.	Pyramid Holiday Park <i>ELS</i>	Request to have land included in Area 2 of ELRS. Recent changes in surrounding area, such as increased capacity of the Gold Coast Airport and problems with nearby Sewage Treatment Plant make the future of the park questionable. Whilst it is not the intention to change the use of the land, having the option to rezone would be of benefit and enable responsive change to other changes in landuse in the surrounding areas beyond control of the park. As accommodation costs increase, will residents be prepared to pay increased tariffs if the land is further impacted by aircraft noise and odour from STP?	Land zoned and developed for residential purposes was regarded as already being within the urban footprint and was not typically considered for inclusion in the ELS. Changing it to an employment zone needs to consider a more detailed analysis of the supply and demand for low cost housing and tourism accommodation in the locality as well as the suitability of the land for employment purposes and its potential compatibility with surrounding land uses.	No change recommended.
35.	Tweed Valley Way, Mooball Lot 7 DP 59320 and Lot 2 DP534493	Fully support strategy (ULR) as owners of land included within Area 9 of the ULR.	Noted	No change recommended.

Table 11-2 Land nominated for exclusion from the Strategies

Land nominated for exclusion from the Strategies				
	Issue	Description	Planning Comment	Action
36.	<p><i>ULRS</i></p> <p>DECC either objects or does not support any of the areas identified in the ULRS other than those parts that coincide with land identified in the Far North Coast Regional Strategy for urban expansion.</p>	<p>There is no need for this strategy.</p> <p>DECC considers the Council's existing zoned land together with the Far North Coast Regional Strategy lands is adequate for urban needs for the next 25 years. To identify further land in a strategy will increase pressure on these areas.</p>	<p>All of the areas in the Strategy have been identified based on the best available information. The principle of having a "rolling stock" of 25 years supply of land is justified in the Strategy and a residential land balance sheet is presented at Table 10.1. At the time of public exhibition Council's position is that it prefers the direction in 11.3 of the Strategy (rely on existing zoned areas and increase urban densities). Council does not accept that the Far North Coast Regional Strategy is the only planning strategy for the Tweed Shire. All Council's have the right to prepare local growth management strategies and if these are more accurate, then the Far North Coast Regional Strategy should be amended accordingly.</p> <p>DECC provides no advice on climate change and planning for urban development in the long term (25 years plus).</p>	No change recommended
37.	<p>Airport Precinct (Area 1 and Area 2)</p> <p><i>ELS</i></p>	<p>Area 1 is heavily affected by noise from the Gold Coast airport, is within the 1 km public safety area, and there are threatened species adjacent to site.</p> <p>Therefore this area should not be developed.</p> <p>Area 2 has noise and safety concerns similar to Area 1, but of a lesser degree. Council should assess any future requirement for retention or rebuilding of the STP before considering this area for employment lands.</p>	<p>It is understood that Area 1 is an area of high airport noise impact, which makes it unsuitable for residential development and there will also be limitations on the types of industry that can locate in this area.</p> <p>The site is ideally positioned for export businesses that rely on air transport and the site is easily accessible from the Tugun Bypass.</p> <p>In regards to conservation values it is acknowledged that Area 1 is ecologically sensitive and should not be in the Strategy.</p> <p>Area 2 is not affected by ecological issues and parts of this site may still be suitable for employment lands uses.</p>	Remove Area 1 from the ELS
37a.	<p>Border Race Track (Area 3)</p> <p><i>ELS</i></p>	<p>This area is zoned for public recreation. This area should not be identified for urban development unless an equivalent area for recreation can be located.</p>	<p>The landowners have expressed support for possible employment lands in the long term. The type of recreation use is quite limited and if this use is no longer viable then the highest and best use for the land should be identified. The land will come under pressure for residential development and identifying it for employment lands is an important step in broadening the employment base of the Tweed Shire.</p> <p>A medium term timeframe was recommended in the draft strategy based on demand assumptions and how the supply of employment lands is expected to diminish in the future.</p> <p>However, the future viability of the current use of this site will be decided within the next ten years and if its not able to be rezoned for employment purposes then it may be lost as a supply opportunity. Accordingly it has been brought forward into the short term time frame.</p> <p>The strategy should be reviewed every five to seven years to check whether areas were developed as expected and to assess any changes in demand of services and infrastructure.</p>	It is recommended that Council consider this site as a short term option for rezoning for employment lands in the ELS.
37b	<p>Chinderah East (Area 4)</p> <p><i>ELS</i></p>	<p>OK as long as constraints (such as presence of EEC's and wetland threatened species) are assessed and avoided.</p>	<p>Comment noted. Specific environmental constraints would be assessed at the time of lodging a rezoning application for land within this Area.</p>	No change recommended

Land nominated for exclusion from the Strategies				
	Issue	Description	Planning Comment	Action
37c	West Pottsville (Area 7) <i>ELS</i>	A large proportion of the 144 ha nominated in the strategy for future development should be excluded due to land within the Coastal zone and records of high ecological value.	<p>The land within Area 7 is predominantly grazing land and is considered suitable for employment lands purposes due to the assessment criteria.</p> <p>Additionally, the southern portion of this Area is consistent with the Far North Coast Regional Strategy.</p> <p>The site is also suitable due to access to the Pacific Motorway via the Cudgera Creek Road interchange.</p> <p>Specific environmental constraints would be assessed at the time of lodging a rezoning application for land within this Area.</p> <p>The area nominated in the Far North Coast Regional Strategy is quite small and inadequate for the long term needs of the Tweed economy. A larger area will assist in broadening the economic base of the Tweed Shire and allow export industry to consider locating on this site as well as service industry.</p>	No change recommended.
38.	Tweed Heads (Area 1) <i>ELS</i>	Area 1 should not be developed. The site should be preserved due to presence of native bird species. Provides detailed bird and plant lists. Includes a letter from NPWS in 2002 citing the "significant environmental constraints" to the pony club site (part of Area 1).	<p>TSC understands that there are specific environmental constraints on Area 1. The site is also impacted by being in close proximity to the Gold Coast Airport.</p> <p>On balance there would be minimal useable land left once these constraints are considered more closely. It is recommended that Area 1 be removed from the Strategy.</p>	Remove Area 1 from ELS
38a	Old Kingscliff STP Site (Area 4) <i>ELS</i>	Site should be preserved (as a wetland reserve) due to ecological value, sport and recreation field opportunities and potential ASS issues.	It is acknowledged that parts of Area 4 near the old Kingscliff STP have native vegetation. It is also common for STP ponds to be used by water birds. However, this site is quite large and it may be possible to preserve the environmentally sensitive areas and still use the majority of the site for employment purposes. Buffers to environmental areas can also be addressed at the rezoning stage.	No change recommended
39.	<i>ULRS</i> and <i>ELS</i>	Agree with intent and coverage of the <i>ULRS</i> . Have comments on the <i>ELS</i> .	Support for the <i>ULRS</i> is noted.	No change recommended
39a	West Tweed Heads (Area 1) <i>ELS</i>	Exclude this area from any future development. The TDRRPA considers that Area 1 has high biodiversity significance and should not be considered for development.	This view has been expressed in a number of submissions and it is agreed that this site has high conservation values and is affected heavily by its proximity to the Gold Coast Airport.	Remove Area 1 from ELS
39b	Border Park <i>ELS</i>	Should remain as Crown Reserve. Should not be Industrial/ Commercial development because it is not identified in the Far North Coast Regional Strategy .	The Strategy is looking at land use in the longer term. The landowners have expressed support for possible employment lands in the long term. The type of recreation use is quite limited and if this use is no longer viable then the highest and best use for the land should be identified. The land will come under pressure for residential development and identifying it for employment lands is an important step in broadening the employment base of the Tweed Shire. Being excluded from the Far North Coast Regional Strategy does not exclude land from being identified in this Strategy.	No change recommended
39c	State and private school areas <i>ELS</i>	These areas should remain education facilities, not commercial/ industrial.	This comment relates to a statement made in Section 9.3 of the ELS that up to 2 ha of land within the immediate vicinity of either Tweed Heads or Tweeds Heads Sth should be considered for addition to the stock of commercial land. The respondent has wrongly assumed this is referring to school sites. The ELS does not refer to school sites and does not identify any particular site for this suggested commercial expansion.	No change recommended

Land nominated for exclusion from the Strategies				
	Issue	Description	Planning Comment	Action
39d	Incorrect discounting of zoned industrial land in the Strategy <i>ELS</i>	Respondent suggests that 15 ha should be added to the discounted land supply for Murwillumbah and 16 ha for Tweed Heads.	Discounting of land supplies is normal practice in preparing a strategy. It recognises that some land that may be zoned is either unlikely to ever yield lots or the yield is likely to be delayed. The factors affecting yield can always be subjective. The respondent has misunderstood the process somewhat. Only 4 ha was discounted from the Tringa Street site not 16 as suggested in the submission. The 8 ha referred to as being in multiple ownership was not discounted, it was the residue that was left after discounting was complete. It is entirely valid to discount the 7 ha occupied by the quarry as stated in the ELS. It is considered that any changes to supply as a result of changes to discounting that could be justified are small and inconsequential over the life of the Strategy.	No change recommended
39e	Inconsistent with the Far North Coast Regional Strategy and fails to address transport issues adequately <i>ELS</i>	The ELS is inconsistent with the estimated demand and supply options from the Far North Coast Regional Strategy . The ELS does not address the transport issues like upgrading the Murwillumbah airport, etc	Although the Far North Coast Regional Strategy was a consideration it was not the “starting point” for any of the areas identified in the draft ELS. The land suitability assessment process is intended to be a “fresh look” at potential employment areas and is explained in the draft document. If anything, the Far North Coast Regional Strategy should be amended to include the more up to date information in the ELS rather than the ELS follow the Far North Coast Regional Strategy . The ELS does address transport issues to some extent. It does not address the possible upgrade of the Murwillumbah airport as this was not part of the brief. If Council wants to establish whether the current airport site is suitable for an upgrade or if there is another site that might be located this can be undertaken as a separate planning study.	No change recommended
40.	Area 1 (Crown Reserve 59360) <i>ELS</i>	This area of land is of high conservation value. It is part of the Cobaki wetlands and the East Coast migratory flyway and is indispensable to migratory birds. It is recommended that it not be included in the Strategy as an area for industrial development. This area is presently occupied by the Tweed Pony Club.	Environmental constraints would have been assessed at the time of lodging a rezoning request for land within this Area. However, there is evidence to suggest the environmental values of Area 1 are significant. It is recommended that it be removed from the ELS.	Remove Area 1 from ELS
41.	Area 1 <i>ELS</i>	Area 1 should be excluded from the ELS as it conflicts with many local, state and federal policies and strategies. Some of the reasons for exclusion are: Crown Land, existing plan of managements for the area, primary koala habitat, EEC’s, threatened species, flood prone, compensatory vegetation area for airport extension. Area 1 is zoned and used for open space and this is an important land use in Tweed Shire. It is also affectively ASS and contains significant vegetation (in parts).	Environmental constraints would have been assessed at the time of lodging a rezoning request for land within this Area. However, there is evidence to suggest the environmental values of Area 1 are significant. It is recommended that it be removed from the ELS.	Remove Area 1 from ELS
42.	Area 1 General <i>ELS</i>	Concern about loss of public land to private ownership by development of Pony Club (Area 1). Concern about escalation of traffic problems from development of lands in vicinity of Gold Coast Airport, particularly on interchange areas. Any other land to be developed should be located in close proximity to working population, unlike development of lands in Murwillumbah.	There is evidence to suggest that environmental values of Area 1 area significant. It is recommended that Area 1 be removed from the ELS.	Remove Area 1 from the ELS

Land nominated for exclusion from the Strategies

	Issue	Description	Planning Comment	Action
43.	Area 1 –Tweed Pony Club Area 4 Chinderah East <i>ELS</i>	<p>Area 1 – Tweed Pony Club: Site is Crown Land Trust, has significant environment and recreation purpose. Has recently been extensively replanted with native indigenous trees and shrubs to reinforce wildlife corridors and backs onto a marine couch landscape through to extensive mangrove swamp and mudflats of the Cobaki Broadwater which is exceptional habitat for a number of native bird species. Records collected by Tweed Bird Observers and others indicate 219 species observed in the area and the adjoining Cobaki Broadwater (with 134 specifically recorded at the Pony Club), includes rare and endangered and birds protected by CAMBA and JAMBA (agreements with China and Japan concerning migratory birds). This site is considered a valuable one for the native bird species and migratory birds from northern hemisphere seasonally and should be conserved for future generations. The site could be a popular avi/eco tourism area. Council is requested to seriously consider the site as a wetland reserve with particular emphasis of native bird habitat.</p> <p>Area 4 Chinderah East. Site is a habitat for many species of native birds and is a wetland area in northern NSW which should be preserved. Has different habitat areas including old ponding areas with tracks in situ, remnant riparian rainforest, melaleuca and casuarinas woodlands, also open tall grasslands. Important part of wildlife corridor, may be acid sulphate soils affected, forms large lakes and wetland area and should be protected, 144 native species have been identified at the site, in times of climate change native birds and animals needs habitat protection.</p>	<p>There is evidence to suggest that environmental values of Area 1 area significant. Its is recommended that Area 1 be removed from the ELS</p> <p>Submissions have raised concern regarding the environmental quality of Area 4 of the ELS. It is acknowledged that parts of this area have native vegetation and noted that STP Ponds are commonly used by water birds. However, the site is quite large and may be possible to preserve the environmentally sensitive areas and still use the majority of the site for employment purposes. Buffers to environmental areas can also be addressed at rezoning stage.</p>	Remove Area 1 from the ELS
44.	Area 1 –Tweed Pony Club <i>ELS</i>	<p>Site identified under Tweed Shire Council Legislation is identified as ‘Environmental Protection and Open Space’ and is a NSW Crown Reserve. Site accommodates several vulnerable/threatened species and the area abuts Cobaki Broadwater, another important recreational and birding area of the Tweed. Request clarification of the Pony Club situation and stress importance that areas like the pony club be retained for public enjoyment and such corridors remain intact for the protection and survival of the birds.</p>	<p>There is evidence to suggest that environmental values of Area 1 area significant. It is recommended that Area 1 be removed from the ELS.</p>	Remove Area 1 from the ELS
45.	Area 4 – Chinderah East <i>ELS</i>	<p>Area 4 is an excellent haven for birds, a prime birding spot in the Tweed with high species count recorded. Tweed Bird Observers were under the impression that that the site was involved in court proceedings between Council and Gales Holdings and that any opportunity to have the site reserved for birds was not possible until legal proceedings were completed. Site is of prime importance to birds in the Tweed and the Council should seriously consider the retention of the site for a wetland centre. Tweed Bird Observers feels that the loss of Kingscliff site to industrial development would be a tragedy to both birds and the Tourism industry. TSC should remain open to the suggestion of developing a small but important bird habitat as a significant asset to the community.</p>	<p>Other submissions have raised concern regarding the environmental quality of Area 4 of the ELS. It is acknowledged that parts of this area have native vegetation and noted that STP Ponds are commonly used by water birds. However, the site is quite large and may be possible to preserve the environmentally sensitive areas and still use the majority of the site for employment purposes. Buffers to environmental areas can also be addressed at rezoning stage.</p>	No change recommended.

Land nominated for exclusion from the Strategies

	Issue	Description	Planning Comment	Action
46.	General Area 1 – Tweed Pony Club Area 4 – Chinderah East ELS	Saddened that the projected increase in population is up to 118,754 over a further 951ha of land. A cap is needed on the population. Shire already faced with social and economic problems, low employment, inadequate public transport, increasing crime and social problems, sewerage and road straining the budget. Question the assumption that increase in population will fix this. Should not encourage population growth, need to encourage innovation in all aspects of green employment generation and social and technical improvements for the people who live here and the environment. What are the plans for after 2031, there is no mention of this in the strategy. Reiterated comments regarding Area 1 and Area 4 as raised in submission written on behalf of Tweed Bird Observers.	All areas of the strategy have been identified based in the best available information. The principle of having a 'rolling stock' of 25 years supply of land is justified in the Strategy and a residential land balance sheet presented in table 10.1. These strategies do not attempt to address socio-economic issues within the Shire, however at the same time are seen to ensure that critical issues such as housing affordability and employment can be addressed. It is recommended that the Strategy be reviewed every five to seven years to check whether areas were developed as expected and to assess any changes in demand of services and infrastructure. The land supply and demand figures would be projected beyond 2031 at this time.	No change recommended.
47.	Area 1 – Tweed Pony Club ELS	Site is a Crown Reserve, operated as community/ not for profit facility for 30 years. Vegetation regeneration work has been undertaken over the site and is part of the Cobaki ecosystem recognized to have the highest level of biodiversity in Australia. Threat for irreversible damage is high and government bodies must protect. Area is public land and should be preserved in perpetuity, It meets 5 of the RAMSAR Criteria and it is too valuable and should not be sold to speculators. There are few release sites (for release of native wildlife into their habitat and this would represent the loss of another.	There is evidence to suggest that environmental values of Area 1 area significant. It is recommended that Area 1 be removed from the ELS.	Remove Area 1 from the ELS
48.	Area 1 – Tweed Pony Club ELS	Tweed Heads Pony Club site is NSW Crown Reserve, zones open space and has operated as the pony club for 30 years. The venue is used 7 days a week by local children and hosts regional events. It is a voluntary organisation which promotes physical, mental and spiritual development of young people, a community service. Also used by birdwatchers and bushwalkers.	There is evidence to suggest that environmental values of Area 1 area significant. It is recommended that Area 1 be removed from the ELS.	Remove Area 1 from the ELS
49.	Area 1 – Tweed Pony Club ELS	Site is a Crown Reserve, operated as community/ not for profit facility for 30 years. Vegetation regeneration work has been undertaken over the site and is part of the Cobaki ecosystem recognized to have the highest level of biodiversity in Australia. Threat for irreversible damage is high and government bodies must protect. Area is public land and should be preserved in perpetuity, It meets 5 of the RAMSAR Criteria and it is too valuable and should not be sold to speculators. There are few release sites (for release of native wildlife into their habitat and this would represent the loss of another.	There is evidence to suggest that environmental values of Area 1 area significant. It is recommended that Area 1 be removed from the ELS.	Remove Area 1 from the ELS
50.	Area 1 and 2 ELS	Land in the vicinity of Coolangatta Airport has suffered significant environmental degradation in recent times, some balancing through remediation is necessary. Area 1 retains natural value and should be used as compensatory habitat to help remedy recent and ongoing environmental degradation. Areas 1 and 2 could be developed for treatment of sewage and wastewater.	Noted. There is evidence to suggest that environmental values of Area 1 area significant. It is recommended that Area 1 be removed from the ELS. Noted.	Remove Area 1 from the ELS

Table 11-3 Criticism of the Strategy development process

Criticism of the Strategy development process				
Respondent	Issue	Description	Planning Comment	Action
51.	Wardrop Valley West (Area 5) and Wardrop Vallet East (Area 6) <i>ELS</i>	Areas 5 and 6 were identified in the Far North Coast Regional Strategy, which is not reflected correctly in the strategy.	The <i>ELS</i> states that these areas are not specifically identified in the Far North Coast Regional Strategy, however the Wardrop Valley area is shown in the <i>ELS</i> as the focus for employment lands.	Amend <i>ELS</i> to acknowledge that Area 5 and 6 were partially identified in the Far North Coast Regional Strategy.
52.	<i>ULRS</i>	Land which has been identified previously for urban development should be developed before any other option is considered. Overall, the respondent does not support the suggestion that there should be an increase in Urban Land through the mechanism of an increase in density.	The <i>ULRS</i> identifies potential urban areas and provides timing for commencement of rezoning. These timeframes have taken into consideration the large areas of land in the Shire that are already zoned for residential purposes. Changes in density is an appropriate way to accommodate increases in population without resorting to Greenfield sites. The strategy should be reviewed every five to seven years to check whether areas were developed as expected and to assess any changes in demand of services and infrastructure.	No change recommended.
52a		The possibility of a "population cap for the Tweed Shire LGA" has not been considered in the strategy.	A population cap is something that could be considered but was not part of the brief for this project.	No change recommended.
52b		The <i>ULRS</i> should be part of the review of Tweed LEP 2000.	The <i>ULRS</i> is a Council Strategy that will influence future LEPs beyond the current review of Tweed LEP 2000.	No change recommended
52c		Page 20 and pg 77: incorrect use of a locality name. Should be 'Fingal Head', not just 'Fingal'.	Noted.	Will be amended in the final <i>ULRS</i>
52d		Population growth statistics should be as accurate as possible.	Agreed. The population growth statistics identified in the Strategy are based on a number of sources including ABS Census data and the Department of Planning data. As the Strategies should be reviewed every five to seven years, if there are any major changes to the population predictions, these would be addressed here.	No change recommended
52e		Inaccurate statistic on page 29 of the <i>ULRS</i> : Fingal Head, zoned 2(a), is NOT 3 storey height limit. It is 2 storeys.	In assessing the capacity of Fingal Head it was assumed that the dwelling density would be 7-13 dwellings per hectare. It is not assumed that there will be three storey development.	No change recommended
52f		Page 57: the term "Goori" is not known, is it meant to be "Koori"?	Goori is the term used in the source document (Tweed Shire Council Social Plan 2005-2009). It is defined as the term that Bundjalung and Gumbainggirr people of northern NSW use to describe Aboriginal Australians (Mundine, W, 2004, Australian Indigenous law Reporter).	No change recommended
53.	Climate Change <i>ELS</i>	<i>ELS</i> does not adequately address the issues of climate change and the consequent predicted rise in sea levels. Areas such as the Airport precinct 1&2 are recognised as being at risk. Potential industrial land at West Tweed and the Airport precinct does not adequately acknowledge the environmental and Aboriginal cultural values of the area. Area 1 is Crown Land and would be challenged if rezoned.	The issues associated with climate change have been addressed and mapped as part of the assessment criteria for the <i>ELS</i> . It is agreed that some of the Employment Lands area are low lying and may be affected. It is not the intent of planning for climate change that all lands potentially affected should be sterilised for use in perpetuity. Employment lands may well be an appropriate use for some areas that will eventually (beyond the life of this Strategy) be affected by climate change. The issue of aboriginal cultural heritage would be addressed at the site level when a specific rezoning proposal is put forward.	Remove Area 1 from <i>ELS</i> No change recommended on other issues.

Criticism of the Strategy development process				
Respondent	Issue	Description	Planning Comment	Action
			<p>when a specific rezoning proposal is put forward.</p> <p>It is not inappropriate to consider Crown Land as being potentially suitable for urban or employment purposes. The NSW Department of Lands considers its land should be used for the highest and best use.</p>	
54.	<p>Critical of strategy process, content, and implementation.</p> <p><i>ULRS and the ELS</i></p>	<p>Council has not held adequate public consultation regarding the Draft Strategies.</p> <p>The strategies are complex, and hard to understand.</p> <p>Height limits should be enforced, the CBD should be kept at 15 stories, Tweed Heads South should be restricted to 6 to 8 stories and new urban developments for units should 4 to 6 stories.</p> <p>Town centres – Crown Land and parkland should be retained as open space.</p>	<p>Public consultation for the project consisted of the following:</p> <p>The strategies were advertisement in the Tweed Link newspaper for any interested parties to comment;</p> <p>Council held interviews with all respondents from the advertising period;</p> <p>Council held meetings with key stakeholders and government departments;</p> <p>All potentially affected land holders were invited to a series of meetings for discussion of draft options;</p> <p>The draft strategy was exhibited from 7 May – 27 June 2008; and</p> <p>All submissions will be considered as part of the finalisation of the strategies.</p> <p>The comments on height limits and open space are noted.</p>	No change recommended.
55.	<p>Kings Land and the Pottsville Industrial/ Employment Lands.</p> <p><i>ULRS</i></p>	<p>Heritage Pacific supports the intent of the strategy.</p> <p>The respondent has concerns about the strategy in regards to relying upon existing zoned land and increase densities in existing urban areas (option 11.3). They consider that this concept would:</p> <p>Create reliance on a finite and constrained source of residential land.</p> <p>Create perception that the long-term residential market in the Tweed is constrained.</p> <p>Inhibit long term service planning for water supply, sewerage and transport infrastructure.</p> <p>Restrict the viability of nominated business or employment generating areas given the absence of supporting population.</p> <p>Place Council in a position where it is reliant upon the actions of a single landowner to achieve short-term release of residential land.</p> <p>The respondent identifies that all Regionally Significant Farmland has been treated in the same manner as State Significant farmland, which is nominated as an absolute constraint. This means that some capable and valuable lands may be automatically excluded.</p> <p>The respondent has indicated that Council has underestimated the short-term demand for quality residential land that exists.</p>	<p>This submission is critical of Council's decision to rely on existing zoned areas with increased density as a preferred direction for urban development (option 11.3).</p> <p>One of the reasons they consider this to be incorrect is that they believe the existing zoned and vacant subdivided land and zoned but not subdivided land will yield considerably less lots than the ULRS assumes.</p> <p>Basically, they assume that both Cobaki Lakes and Kings Forest will not yield any lots in the short term.</p> <p>This is inconsistent with the advice of the developer of those sites. However, if it proves to be correct then the land supply figures can be adjusted at the next review of the ULRS.</p> <p>Council was presented a range of options in the draft ULRS and opted to focus on zoned areas and increased densities (11.3). The recommended option was to rely on existing zoned areas, promote urban consolidation and identify and release Greenfield sites in the short, medium and long term. Given the need to have a strategy that looks beyond existing zoned land this option (11.5) is still preferred.</p> <p>In any case, the strategy should be reviewed every five to seven years to check whether areas were developed as expected and to assess any changes in demand of services and infrastructure.</p> <p>Regionally significant farmland is not an absolute constraint, but the conditions that must be complied with to justify its inclusion in a strategy are extremely difficult to achieve.</p>	It is recommended Council re-visit its decision on major directions for urban land development and adopt 11.5 of the <i>ULRS</i> as its preferred position.

Criticism of the Strategy development process				
Respondent	Issue	Description	Planning Comment	Action
56.	<i>ULRS and the ELS</i>	<p>TEDC recommends that the strategies should not be looked at in isolation of each other, as they are interrelated and important in delivering long-term sustainability in Tweed Shire.</p> <p>TEDC research suggests that there is a need to create 13,000 jobs in the Tweed between 2001 and 2015.</p> <p>In TEDC's opinion the current employment generating land predictions identified in the <i>ELS</i> will be short of the required amount.</p>	<p>The <i>ULRS and the ELS</i> were prepared at similar times with an understanding of their interrelationships. They were also discussed at all of the community and stakeholder meetings as a pair of documents and were exhibited publicly at the same time. Many submissioners made comments on both documents. However, the comment that they should be considered together and not in isolation is a valid point. Combining the two strategies into a single document may assist in achieving this outcome.</p> <p>The current employment generating land reflects the current situation that there are significant areas of land in Tweed Shire that are already zoned for employment purposes. Where required this strategy would be reviewed to check whether areas were developed as expected and to assess any changes in demand. Where considered appropriate these strategies would be amended.</p> <p>Much of the specific criticisms of the Strategies relates to the fact that the brief for preparing them was limited in scope and budget.</p> <p>The potential additional demand for employment lands is acknowledged as possible, but in order to find up to 800 ha of employment land the land suitability criteria will need to be revised. In particular the need to protect agricultural land and avoid filling in the flood plain would need to be reviewed.</p>	<p>It is recommended that the two strategies be combined into a single document (with two distinct but related parts) for adoption by Council.</p>
57.	Area 1 & 2 <i>ELS</i>	<p>Respondent is disappointed that several requests on behalf of the airport as 'stakeholders' to have discussions with Council were not agreed to. Correspondence dates back to 2004.</p> <p>Development in West Tweed area is of considerable interest to Gold Coast Airport. Airport related constraints have the potential to severely restrict development and this has not been taken into account in determining net developable areas in section 9.3.</p> <p>One main airport-related constraint is on any actions in the airports "prescribed airspace" which could be classified as a controlled activity.</p> <p>Other identified constraints are:</p> <p>Height limit (heights of buildings and structures will be severely curtailed);</p> <p>Lighting (localities within the airport's prescribed airspace in close proximity to the runway are subject to mandatory limitations on levels of illumination which are able to be emitted);</p> <p>Emissions, turbulence (exclude activities which may variously result in air turbulence capable of affecting normal flight of aircraft, emit smoke, dust, steam or gas);</p> <p>Public safety (Area 1 and 2 are situated within what is described as the airport's Public Safety Zone.</p> <p>The respondent considers that the majority of Areas 1 and 2 are unsuitable for most types of industrial development especially large-lot industrial estates.</p>	<p>Gold Coast Airport made comments in an earlier submission to Council on the issues of building heights, industry emissions, site illumination and designated public safety areas. These issues are all mentioned in Section 7.3 of the <i>ELS</i> as constraints to any possible development of Areas 1 and 2.</p> <p>However, the comment that buildings will be precluded (completely) on Area 1 due to mandatory restrictions is significant.</p> <p>Further analysis is required of the potential restrictions on Area 2 to see if any of it is able to be developed. It is noted that a 21m tall drive in theatre screen still exists in Area 2 and there is considerable 2 storey residential development in the general area.</p>	<p>Remove Area 1 from <i>ELS</i>. Ensure that obstacle height limits, lighting restrictions and the public safety zone are closely considered in relation to Area 2.</p>
58.	General Area 1 – Tweed Pony Club Area 4 – Chinderah East	<p>Area 1 – Currently used as a horse riding facility and accommodates significant vegetation such as community of Swamp Mahogany, Lady Tankerville's Swamp Orchid. Wetlands are a valuable ecological asset.</p> <p>Area 4 – Filling of flood prone land at Chinderah will result in floodwaters moving elsewhere. Must allow floods to inundate natural flood plane.</p>	<p>There is evidence to suggest that environmental values of Area 1 area significant. Its is recommended that Area 1 be removed from the <i>ELS</i></p> <p>Area 4 is classified as flood liable, and flooding is clearly identified as a constraint to land suitability in the strategy. Section 10.2 states that the strategy will be implemented through the rezoning process, at which time</p>	<p>Remove Area 1 of the <i>ELS</i>.</p> <p>No change recommended</p>

Criticism of the Strategy development process				
Respondent	Issue	Description	Planning Comment	Action
	ELS General ULRS		<p>flood impact assessments must be provided to Council. This must include assessment of cumulative impact of all other flood plain development proposals in the surrounding area. Similar assessment has previously been undertaken in the West Kingscliff area. As stated in Section 7.5, this area has previously been identified in the Far North Coast Regional Strategy for employment land purposes, so it is prudent for it to remain in the strategy while acknowledging the constraints.</p> <p>A number of growth scenarios or methods for estimating growth were included within the strategy. The table on page 39 of the ULRS demonstrates a number of options to estimate growth. The recommendation included within part 6.7 is seen as the most appropriate for estimating land to ensure adequate supply onto the market over time.</p>	
59.	General	<p>ULRS 6.6 – Strong Regional Growth Scenario. Refute the comment in 6.6 which states ‘future of Tweed Shire as part of a broader picture of growth and change in South East QLD Northern NSW.’ Green Tweed is the vision. Two storey height limit at Fingal, it is the vision of the Community Association to keep it that way</p> <p>ULRS Fails the test of ESD allowing and encouraging the Tweed Shire to become an extension of the Gold Coast by allowing unconstrained growth to occur.</p> <p>ULRS makes no attempt to ascertain the carrying capacity of the Tweed's natural assets to sustain unlimited population growth. This needs careful consideration on a number of environmental grounds (environmental considerations noted in submission).</p> <p>The strategy is inconsistent with the Far North Coast Regional Strategy in that it recommends land release east of the Pacific Highway.</p> <p>Area 5 is another example of increasing urban area, following Council's pattern for strip development with no greenbelt/ native vegetation. The ULRS should be used as an opportunity to plan for protection of villages in the shire and ensure the linkages through remnant vegetation to allow for wildlife corridors.</p> <p>Question the need for new Greenfield land release when there is capacity for extensive residential development in the shire at the present time.</p>	<p>Lands identified for urban and employment release were identified based on the best available information to ascertain the least constrained land. Sites coming forward in the future will undergo a full assessment through the rezoning process to ascertain sustainability.</p> <p>There is no agreed or adopted method of determining the carrying capacity of geographically defined spaces in relation to human populations given variable technology, differing patterns of consumption and trade. It must be noted on this point that the purpose of the strategies is to ensure there is a quantifiable supply of land. The release of such land however is facilitated through the rezoning process and detailed site investigation, in response to demand at the time and in conjunction with the NSW State Government who determine population forecasts/targets for the Shire.</p> <p>As above. Actual release of land is done through the rezoning process in consultation with the NSW State Government. Upon review of the Far North Coast Regional Strategy, TSC will inform the DoP of available land supplies throughout the shire, including east of the Highway to enable them to make robust policy decisions at that time.</p> <p>Individual land area will require master planning prior to the rezoning of land. As part of this process, an assessment of buffers and other elements of design would be undertaken.</p> <p>The principal of having a ‘rolling stock’ is justified within the strategy and on the residential land balance sheet in table 10.1. The preferred direction recognizes that the Tweed wants to take a supply based approach and not be restricted by current levels of demand for residential land. This ensures that there will be no perception of the long term residential market being constrained, allowing a variety of landowners to look at supplying the market over time, and encourage existing zoned areas to be developed before competition was brought on line.</p>	No change recommended

Criticism of the Strategy development process				
Respondent	Issue	Description	Planning Comment	Action
60.	General ULRS	<p>Continual exponential population growth is not viable and will be at the expense of the environment. There is significant land within the shire to accommodate reasonable population growth in the future.</p> <p>Land forming of recent subdivisions not suited to local topography and any future subdivision should be more sympathetic to localised conditions.</p> <p>Population densities must be increased for both existing and future subdivisions. At present, dwelling sizes are excessive and diverse and smaller housing types to increase densities should be sought, including infill housing. A more sustainable low impact approach to residential development should be sought, in terms of water supply, power and recycling.</p> <p>There is a large gap between the mission and vision statements about ecological sustainability promoted in government documents and delivery of development on sites shown in recent residential subdivisions.</p>	<p>The principal of having a 'rolling stock' is justified within the strategy and on the residential land balance sheet in table 10.1. The preferred direction recognizes that the Tweed wants to take a supply based approach and not be restricted by current levels of demand for residential land. This ensures that there will be no perception of the long term residential market being constrained, allowing a variety of landowners to look at supplying the market over time, and encourage existing zoned areas to be developed before competition was brought on line.</p> <p>Individual land area will require master planning prior to the rezoning of land. As part of this process, an assessment of landforming and other elements of design would be undertaken in accordance with adopted Council policy.</p> <p>Individual land area will require master planning prior to the rezoning of land. As part of this process, an assessment of population densities and other elements of design would be undertaken to ensure the development of land is in accordance with best practice at that time. Targets within the strategies exceed densities currently evident in the Tweed Shire.</p> <p>Individual land area will require master planning prior to the rezoning of land to ensure development of future land is done in an efficient and sustainable manner.</p>	No change recommended
61.	General	Concerned that in the preparation of a number of draft strategies (Flood Plain Management, Wet Land Management, Crown Land Management and Urban Development) minimal consideration has been given to preservation of habitat of native species. The plans are flawed and need reassessment to include native habitat preservation.	The draft ULRS and ELS Strategy was prepared consistently with the best available information at the time. This included substantial ecological information such as koala habitat, wetlands, littoral rainforest and detailed vegetation information from the Tweed Vegetation Management Strategy. Further to this, the strategy will be implemented via the rezoning process at which time further ecological / vegetation assessment would be undertaken.	No change recommended
62.	General	<p>Mapping of flood hazard areas shows no flooding in coastal areas south of Kingscliff which is incorrect. Information in draft Coastal Creeks Flood Study should be included before strategy is finalised.</p> <p>Question the release of employment lands for the Dunloe Park Sand Extraction Plant when there is also the new Cudgen Lakes Sand Extraction Plant in the shire which will provide 650,000 tonnes of sand per year and which will likely remove the need for the Dunloe Park plant within a very short time of its creation, rendering it an unsustainable use of land.</p>	<p>Mapping comes from the Tweed Valley Flood Study only, so does not depict all flood liable land. Mapping of Coastal Creeks and Floodplains is still not available, but is imminent. No studies have been undertaken for the Tweed Valley upstream of the current mapped area. Council's flooding engineers have made further recommendations to amend the strategy in relation to flooding to better explain this situation.</p> <p>If the Dunloe Park sand extraction proceeds it is potentially compatible with employment lands if appropriate road links can be established. This will be an important issue to resolve as part of the rezoning process for any employment lands in this location.</p>	Amend flood liable land mapping in line with Council's flooding engineer requirements to better explain the flooding situation.

Table 11-4 Specific Issues

Specific Issues				
Respondent	Issue	Description	Planning Comment	Action
63.	Over estimate of demand for industrial land. <i>ELS</i>	The designation of Chinderah STP land for industrial purposes is not considered to be the highest and best use for that site. There is an over-estimation of the amount of land needed for industry.	The old Chinderah STP site has been identified for employment lands. In outlining the brief for this project Council specifically stated that it has a retail strategy and this should be considered in preparing the ELS. It was not within the bounds of the brief to revisit the retail strategy. Our methodology for estimating the demand for employment lands is outlined in the ELS. Some submissions have suggested it is an underestimate and others an overestimate. The main principle is that Council needs to identify potential sites in a strategy as a step towards rezoning and development. Ultimately the market will determine which lands proceed and for what employment purposes they are developed. The strategy should be reviewed every five to seven years to check whether areas were developed as expected and to assess any changes in demand of services and infrastructure and the take up of existing zoned land.	No change recommended
64.	Dunloe Park (Area 7) <i>ULRS</i>	Dunloe Park (Area 7) referred to on pg 46 of the strategy should be "Dunloe Park Urban Release Area". On pg 48, s7.6.6 the strategy incorrectly states: "this area is located to the west and south of the Black Rocks Estate and lies to the west of Mooball Creek" – this should say "adjacent to and west of the Black Rocks Estate". Area 7 as shown on Figure 17 is not the same as the proposed future release areas shown on Map Sheet 1 of the Far North Coast Regional Strategy . Area 7 should include the 'green corridor' (which is currently excluded) and further land in the north western corner, both of which are said to be unconstrained. Table 7-1 on pg 41 indicates that the Black Rocks Estate has 90 dwellings and 250 persons. There are actually 84 dwellings and 235 persons. Pg 48, s7.6.6 – recommend that the siting and design of the new Sewage Treatment Plant should form part of the future 'Master Plan' for the area to be consistent with the Draft Development Control Plan for the Pottsville locality.	Noted and agreed. Noted and agreed. Although the Far North Coast Regional Strategy was a consideration it was not the "starting point" for any of the areas identified in the draft ELS. The land suitability assessment process is intended to be a "fresh look" at potential employment areas and is explained in the draft document. If anything, the Far North Coast Regional Strategy should be amended to include the more up to date information in the ULRS rather than the ULRS follow the Far North Coast Regional Strategy . However, in this case it is noted that recent significant earthworks have been undertaken along the steep land on the western edge of this area. This has reduced the steepness of it considerably. To assist with the master planning of this area it should be included in Area 7. These dwellings and person counts are described in the Strategy as "approximate". The figures used are sufficiently accurate for the purposes of a Shire wide Strategy. It is noted however, that the totals in Table 7-1 of the <i>ULRS</i> need to be corrected. Agreed.	It is recommended these minor text changes be made in the <i>ULRS</i> . It is recommended these minor text changes be made in the <i>ULRS</i> It is recommended this land be added to Area 7 of the <i>ULRS</i> . Correct the totals in Table 7-1 of the <i>ULRS</i> . Amend section 7.6.6 of the <i>ULRS</i> .to include these comments on a possible new STP.

Specific Issues				
Respondent	Issue	Description	Planning Comment	Action
		Council should commence the rezoning process for Area 7 following adoption of the Strategy.	Council was presented a range of options in the draft ULRS and opted to focus on zoned areas and increased densities (11.3). The recommended option was to rely on existing zoned areas, promote urban consolidation and identify and release Greenfield sites in the short, medium and long term. Given the need to have a strategy that looks beyond existing zoned land this option (11.5) is still preferred.	It is recommended Council re-visit its decision on major directions for urban land development and adopt 11.5 of the <i>ULRS</i> as its preferred position
65.	General	Fully support Tweed Economic Development Corporation's response to ULR and ELR	See Comments in response to TEDC submission.	No change recommended
66.	General <i>ULRS</i>	Seeking to ensure that asset and amenity embodied in unique lowrise built environmental character should be properly valued in any strategy for urban release. Discussion about height limit and density should be further examined. Existing height limits in the shire (3 storeys with exception of Tweed Heads) at present embody a substantial undeveloped capacity to increase density which is yet to be exploited.	The process of urban consolidation and opportunity for increase to densities in existing urban centres is not discounted. Through a series of locality plans, existing urban centres are assessed for opportunities, in consultation with the public. The <i>ULRS</i> does intend to fetter opportunity to provide additional accommodation within existing urban areas and appropriately zoned but undeveloped supply of such areas would be considered prior to the release of any Greenfield land in the future.	No change recommended
67.	General	Summary of response to all Major Directions for Urban Land Development. 11.1 – rely on existing codes, note caution in development of West Kingscliff areas. 11.2 Rely on existing zoned and increase density from rural residential – not appropriate given value of agricultural land. 11.3 Rely on existing zoned areas and increase density in key urban areas. Agree to maintaining zoned lands, however increase in heights (and density) may not be appropriate in coastal villages due to climate change etc. 11.4 Rely on existing zoned areas and delay release of Greenfield sites. Agree with the wait and see approach. Perhaps a population cap would be the appropriate option.	Comments regarding height and density noted and increases to height and density in existing settlements would be subject of individual locality planning and public consultation. The principal of having a 'rolling stock' is justified within the strategy and on the residential land balance sheet in table 10.1. The preferred direction recognizes that the Tweed wants to take a supply based approach and not be restricted by current levels of demand for residential land. This ensures that there will be no perception of the long term residential market being constrained, allowing a variety of landowners to look at supplying the market over time, and encourage existing zoned areas to be developed before competition was brought on line.	No change recommended
68.	General <i>ELS</i>	Ensure that draft ELR does not include any lands currently zoned environmental protection, recreation and public open space. Area 1 (West Tweed) includes Crown Reserve which has significant environmental value and is of public benefit for recreation.	Both <i>ELS</i> and <i>ULRS</i> strategies and land recommendations were subject of extensive mapping and sieving to ascertain most appropriate, least constrained land for development. Included in this was lands included within the Tweed Vegetation Management Strategy which provided a comprehensive review and update of environmental zones within the Shire. The environmental quality of Area 1 of the <i>ELS</i> has been noted and has been recommended for removal from the strategy.	No change recommended
69.	General (ULR)	Preserve land for environmental protection, recreation and public open space. Recommend buffer zones around remnant vegetation sites to allow fauna to travel across the landscape. Fragmenting into patches threatens viability of flora and also fauna. Koala Beach is a model urban settlement – with levy for habitat management. Vital to preserve areas of environmental significance and public open space.	Comments relating to environmental protection area noted. Before land is developed, the strategy recommends significant master planning be undertaken at the rezoning and subsequent development approvals for the site.	No change recommended
70.	General	Concerned with proposal to increase heights. Locals want heights to be retained at 3 storeys or less. Community groups are being ignored, there is no proper consultation. Whilst the area could benefit from improvements this should not include open slather high rise developments.	The draft <i>ELS</i> does not make any recommendations to alter the heights of development in existing settlements. Any such change would be the subject of an individual locality plan and public consultation for individual settlements.	No change recommended
71.	General Area 4 East Chinderah <i>ELS ULRS</i>	Objection regarding both strategies based on the Council proposing industrial as opposed to retail at Area 4, the Council not approving plans presented by Gales Kingscliff and Gales Holdings, the Council not approving Sand Excavation at Cudgen, the Council not approving plans for	The purpose of the daft <i>ELS</i> was to identify opportunities for employment land development (which excludes retail development) and did not address other development forms. Any further work relating to retail provision within the Shire falls outside the scope of this strategy.	No change recommended

Specific Issues				
Respondent	Issue	Description	Planning Comment	Action
72.	General Area 4 East Chinderah ELS ULRS	<p>a district centre at Chinderah. These plans will benefit people who reside between Tweed/Coolangatta and south of Byron. The structure plan will bring employment to thousands of people. Kingscliff needs sporting fields, recreation areas, housing, roads, shopping centres and business opportunities.</p> <p>Objection to ELS and ULRS (specifically Area 4 East Chinderah) as this site should be developed for retail not industrial. Growth in population in South Tweed and Kingscliff warrants new district centre. Retail sites in Tweed Heads and South Tweed are congested and at maximum capacity. A new district centre away from Kingscliff town centre will alleviate traffic congestion and movement problems. Macarthur Square and Robina Town Centres are good examples.</p>	The purpose of the daft ELS was to identify opportunities for employment land development (which excludes retail development) and did not address other development forms. Any further work relating to retail provision within the Shire falls outside the scope of this strategy.	No change recommended
73.	General	<p>Generally in support of use of definition of 'employment lands' being business park type development which excludes land used predominately for retail uses.</p> <p>Any development should respect local topography, with minimal landforming to respect and preserve the rural appearance of the lands in the vicinity of Pottsville Village.</p> <p>PCA supports in principle the area shown as employment land / industrial lands in ELRS and Pottsville Locality Plan however realise grave concern for the initial development process that no heavy traffic should be directed or allowed on Mooball – Pottsville Road, south from the intersection with Cudgera Creek Road to an entrance to the proposed industrial area. No industrial / employment land development approval should be considered without adequate road infrastructure in place to service new developments directly to Cudgera Creek Road and Pacific highway.</p> <p>Cudgera Creek has flooding potential and must be kept as natural as possible. The creek passes through the south western section of the Employment Lands area and should therefore should be protected by suitable reserves. No development should be allowed to close the creeks natural requirements in times of flood.</p>	<p>Noted.</p> <p>Any subsequent development of sites would be the subject of comprehensive master planning covering matters such as landforming.</p> <p>As above. Prior to release of land, extensive master planning / rezoning would be undertaken to further ascertain the appropriateness of sites for development. As a result, issues such as traffic generation and road capacity would be considered extensively and resolved to the satisfaction of Councils Infrastructure Division prior to any release of land.</p> <p>Noted. As above.</p>	No change recommended

Specific Issues				
Respondent	Issue	Description	Planning Comment	Action
74.	General <i>ELS ULRS</i>	<p>Objection to the proposal to increase residential yields by opening up existing rural residential lots to higher density development or releasing agricultural lands for same purpose. (11.2)</p> <p>Objection to any proposal to increase density in Kingscliff by increasing present height limits (11.3) by introduction of 4 and above storey apartments.</p> <p>Objection to any proposed development of Greenfield sites for residential development where environmental problems such as nearby contamination and flooding impacts have not been thoroughly assessed.</p> <p>Query appropriateness of sand extraction from Cudgen Lakes given Acid Sulphate Soils</p> <p>Note that in the absence of 'Flood Liable Lands Strategy' query the appropriateness of development of land at West Kingscliff and Chinderah given it is entirely flood prone.</p>	<p>Any proposal to increase residential yields in existing areas would be the subject of individual locality planning over subject sites.</p> <p>The draft ULRS does not alter existing heights and densities. Any such alteration would be the subject of a specific locality planning exercise in consultation with the public.</p> <p>The strategies ascertained constraints over land to ensure the least constrained land was put forward in the strategy. However, prior to the release of land, more detailed site specific analysis of recommended sites would need to be undertaken to ensure the suitability for future development.</p> <p>This concern falls outside the content of the draft ULRS.</p> <p>Area 4 is classified as flood liable, and flooding is clearly identified as a constraint to land suitability in the strategy. Section 10.2 states that the strategy will be implemented through the rezoning process, at which time flood impact assessments must be provided to Council. This must include assessment of cumulative impact of all other flood plain development proposals in the surrounding area. Similar assessment has previously been undertaken in the West Kingscliff area. As stated in Section 7.5, this area has previously been identified in the Far North Coast Regional Strategy for employment land purposes, so it is prudent for it to remain in the strategy while acknowledging the constraints.</p>	No change recommended
75.	General <i>ELS / ULRS</i>	<p>As a result of expected increased in population, Council and NSW and QLD State Government should investigate in partnership rail connections along the Tweed Coast connecting to heavy rail link at Coolangatta through to Grafton. A trunk line Tweed Heads from Murwillumbah to Byron Bay.</p>	<p>Council remains open to investigating any major infrastructure project in partnership with the State Government of NSW and QLD.</p>	No change recommended
76.	General <i>ELS / ULRS</i>	<p>TSC has had a long running philosophy of high industrial and residential development growth, in many cases to the detriment of the environment. TSC are anticipating a population in excess of 115,000 and for every new residence it is expected that 1.6 vehicles are added to the roads. What are the infrastructure plans to accommodate this. Planned developments at Piggabeen/ Cobaki and Bilambil Heights place strain on Kennedy Drive already congested. In 2006 water restrictions were placed on residents and Clarrie Hall dam has not been increased therefore how does Council expect to accommodate additional populations water needs. An increase in building height limits would destroy the character of the shire and place strain on infrastructure. Formulate and put in place infrastructure before, not after, opening the doors to a major population increase.</p>	<p>The purpose of the ULRS and ELS is to guide the development, ensuring that there is enough land to accommodate population growth if there is genuine demand over the long term. The strategies also assist in infrastructure planning. Any additional release of land is subject to a rezoning whereby further investigation of infrastructure capacity would be examined. The strategies do not examine or make recommendations on building heights over land within the shire.</p>	No change recommended

GHD

Suite 2 317 River Street Ballina NSW 2478
PO Box 372 Ballina NSW 2478
T: 02 6620 6500 F: 02 6620 6501 E: bnkmail@ghd.com.au

© GHD 2009

This report has been prepared by GHD in response to a specific brief issued by Tweed Shire Council and the Proposal for services presented by GHD. This report is intended for the sole use of the client. It has been prepared in accordance with the Terms of Engagement for the commission and on the basis of specific instructions and information provided by the client. The contents and conclusion of this report cannot be relied upon by any third party.

This report should not be altered, amended or abbreviated, issued in part or issued incomplete in any way without prior checking and approval by GHD.

Document Status

Rev No.	Author	Reviewer		Approved for Issue		
		Name	Signature	Name	Signature	Date
0	M Svikis B Wilkinson	S. Lawer		S. Lawer		10/02/09



Tweed Shire Council

PO Box 816
Murwillumbah NSW 2484

(02) 6670 2400

1300 292 872

planningreforms@tweed.nsw.gov.au

www.tweed.nsw.gov.au