

Council Reference: GCAL
Your Reference: Project LIFT

18 September 2015

Chief Operating Officer
Gold Coast Airport Pty Ltd
Locked Bag 5
COOLANGATTA QLD 4225

Dear Sir/Madam

**Gold Coast Airport - Preliminary Draft Major Development Plan
July 2015 – SUBMISSION – TWEED SHIRE COUNCIL**

Thank you for the opportunity to provide a submission on the Preliminary Draft Major Development Plan July 2015.

Council acknowledges that Gold Coast Airport is a significant economic driver within our region, in terms of employment, direct and indirect economic impact and the facilitated impact arising from the flow on benefits of the visitor economy which includes tourism, education and major events.

Whilst Gold Coast Airport is a significant infrastructure asset to both south east Queensland and northern New South Wales its expansion is not without significant environmental impact to the site. In this regard, there are three observable areas of impact warranting of reply:

- Proposed clearing of Native vegetation;
- Roads and traffic, and
- Drainage and Acid Sulfate Soils.

Council trusts that Gold Coast Airport Pty Ltd will have due consideration of these issues in regard to the proposed expansion of the airport.

Proposed clearing of native vegetation

1. The Plan identifies the high ecological value of vegetation on the site, much of which is of state significance, and acknowledges that implementation will result in highly significant, permanent and irreversible long term impact on ecological values including endangered ecological communities and numerous threatened species.
2. An offset strategy is proposed; however, there are no details for consideration and response.
3. While Council does not have a decision making role in relation to this proposal, it is recommended that this vegetation be retained due to the high quality and

significance of the vegetation, and the significant long term impact of clearing as the selected extracts from the Plan identify:

- a. Significant residual impacts will occur as a result of the clearing of Swamp Sclerophyll Forest (Endangered Ecological Community (EEC) under the New South Wales *Threatened Species Conservation Act 1995* (TSC Act)) in the project footprint.
- b. The project is also considered likely to have a significant impact on the following threatened fauna species and/or their habitat - Wallum sedge frog (*Litoria olongburensis*), Wallum froglet (*Crinia tinnula*) and Common planigale (*Planigale maculata*).
- c. Removal of approximately 16 hectares of the 'Swamp Sclerophyll Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions' EEC listed under the TSC Act will occur as a result of vegetation clearing for the project. The majority of this vegetation was assessed by the proponent as of high to very high ecological condition and the extent of impact has been identified as a significant impact on the environment under the *Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth).
- d. A total of 32.5 hectares of native vegetation is proposed to be cleared, including the 16 hectares of Swamp Sclerophyll EEC, significant areas of heathland and known habitat for threatened species including the Lesser Swamp Orchid and ten other conservation significant flora species.
- e. The proposed development will result in the loss of breeding habitat for the Wallum Sedge Frog, Wallum Froglet and the Common Planigale, and the loss of individuals of this species (due to death or injury during vegetation clearing activities). A total of 3.8 ha of suitable habitat of the Wallum Sedge Frog, 26 ha of suitable habitat of the Wallum Froglet and 30.4 hectares of the Grey Headed Flying-fox and Common Planigale is proposed to be removed.
- f. The removal of this significant area of vegetation will create impacts beyond the site by reducing landscape connectivity. Seasonal, temporary and permanent dispersal pathways will be negatively impacted with resulting implications for genetic flow and population viability. The project footprint forms part of a range of mapped fauna corridors that extend locally to habitats within the Cobaki Broadwater and the Terranora Broadwater. Regionally, the corridor mapping shows that the project footprint is at the end of a large regional corridor that extends to the hinterland in the west and beyond. The corridors that link to the Cobaki Broadwater, as well as the corridor that links to the Terranora Broadwater have been identified as important corridors for the bats and birds (e.g. flying-foxes, birds of prey with large home ranges). A fauna corridor between Ukerebagh Nature Reserve and the project footprint may also provide connectivity for the same types of highly mobile fauna species.

Roads and traffic

1. Section 16.3 Future Transport Network Proposals

- a. In Section 16.3.5 Development, the Plan states that the “*Border Park Raceway is currently subject to a development application to redevelop the site to include a warehouse and showrooms*”. This statement is incorrect.
- b. The Border Park site is currently subject to a Planning Proposal seeking to rezone the site for employment purposes through a mix of B7 Business Park zone and retaining the RE2 Private Recreation zone over areas of ecological significance. There is no development application for the stated uses and one cannot be lodged until the planning proposal results in the LEP being amended.
- c. The Plan then goes on to say that “the development proposal includes a signalised intersection on the Gold Coast Highway and will be delivered in the following stages....” This statement is incorrect.

The Border Park Planning Proposal is seeking in principle support from NSW Roads and Maritime Services (RMS) to permit a signalised intersection to facilitate the rezoning. The design of the intersection will be the subject of a future DA, subject to the making of the LEP Amendment to permit the proposed uses.

- d. Page 290 of the Plan includes an image of the Stage 2 concept plan which was publicly exhibited with Planning Proposal for rezoning of the site. The image has been captioned “*Bunnings Tweed Heads, Border Park Raceway Site Proposed Development*”.

While this image is used out of context and potentially without the owner’s permission, it is not a “Proposed Development”, but rather, a concept plan for the purposes of assessing the suitability of the rezoning of the site.

2. Status of construction access to Pacific Highway

- a. The Plan identifies a “Development Footprint” in red outline on figures throughout the document and states in 16.7 Impact Assessment Figure 16.16 that this road is for proposed construction access from the Gold Coast Highway.
- b. It is understood that NSW Roads and Maritime Services (RMS) is conducting a full intersection and traffic generation assessment which will consider projected traffic generating impact of future development surrounding the proposed intersection, including further development on the Airport which suggests that the road to be constructed is for more than “proposed construction access” only.
- c. Regardless of whether the proposed construction access is a temporary access or not, the need to clear all vegetation within the arc of the road is questioned.

- d. While Council may have a concurrence role only in approval of any changes to the traffic regime on the Pacific Highway, discussions with Council and RMS regarding the potential traffic generating impact of any future development is encouraged at the earliest stages in the planning process.

Drainage and Acid sulfate soils

1. Dewatering operations, mainly associated with the construction of the proposed drainage channel, are of concern and raise the need for management of Acid Sulfate Soils (ASS) to prevent contamination of surface and Groundwater.
2. The ASS management criteria reported have been adopted from the QLD State Planning Policy 2/02 Planning and Managing Development Involving ASS. As the development works are mainly in NSW the use of the NSW ASSMAC criteria would be preferred; however, it is noted that the 18mols H+/tonne criteria adopted is the same under the ASSMAC guidelines and management of fill is better addressed in the Queensland guidelines.
3. An ASS Management Plan will need to be prepared in accordance with the criteria described in Chapter 22 Section 22.2.2.
4. The quality of groundwater is reported as being variable across the site; however, elevated levels of dissolved Aluminium (Al), Iron (Fe) and to a lesser extent Zinc (Zn) were detected. The solubility of these heavy metals decreases with increases in pH therefore if these are not managed properly during dewatering operations there will be the potential for significant impacts to occur in receiving waters which have a higher pH reading.
5. A Dewatering Management Plan will need to be prepared in accordance with the criteria described in Chapter 22 Section 22.2.4.
6. Surface water impacts will need to be managed under a Construction Environmental Management Plan in accordance with Chapter 22 Section 22.3.

For further enquiries please contact Council's Director Planning and Regulation, Mr Vince Connell, on (02) 6670 2423.

Yours faithfully

Troy Green
General Manager