



Introduction

Overview

The City of Gold Coast (City) invests significantly in new and upgraded trunk infrastructure to facilitate urban development on the Gold Coast. The Local Government Infrastructure Plan (LGIP) is Part 4 of the City Plan and outlines where, when and how trunk infrastructure will be delivered over the next 15 years. The role of the LGIP is to clearly show the City's plans for trunk infrastructure to support future growth and urban development. It ensures trunk infrastructure is efficiently coordinated and delivered. The LGIP also guides the City's future capital works program and assists with long term financial planning.

State interest review of the draft LGIP was completed in September 2017, following which Council endorsed the draft LGIP for public consultation. The official public consultation period was held from 4 October to 15 November 2017 (31 business days). Council officers reviewed and responded to all properly made submissions to the LGIP and a Council response to each submission is provided in this report.

Council has endorsed the draft LGIP to be sent to the State Government for their final review and following Ministerial consideration, the City will be advised whether the draft LGIP may be adopted.

Public consultation

During the public consultation phase, Council engaged the community through advertising, an industry event, six (6) public information sessions that were conducted at strategic locations covering council divisions of the Gold Coast, fact sheets and hard copies of the Draft LGIP being available at the City's administration centres at Bundall and Nerang. The draft LGIP was also displayed and available for download on the City's website, along with an interactive mapping tool to assist the public in visualising where trunk infrastructure will occur.

Submissions received

Council received 20 public submissions and 2 internal submissions during the public consultation period, which were analysed into approximately 75 separate points requiring consideration. Some submissions received by Council raised a single issue or point relating to a specific part of the draft LGIP. Other submissions raised a number of issues and related to various parts of the draft LGIP.

All points of submission have been considered by City officers and if applicable, sent to the relevant City network for consideration. Responses were then consolidated and reviewed internally by Strategic Infrastructure and tabled at the City Planning Committee and Council for review. Final responses can be viewed within the table of this report – the *Draft Local Government Infrastructure Plan Submissions Report*.

All submitter comments or 'points of submission' have been allocated into 'sub-categories'. A table for each 'sub-category' details:

- Submission numbers relating to each comment/point of submission.
- Summary of submitter comments or point of submission.
- Council's response to each submitter comment/point of submission.
- Whether the comment/point of submission has resulted in a change to the draft LGIP.
- If the submission will result in future action. This could include investigation and analyses that may or may not eventuate in change to future LGIP amendments.

How to view your submission response

If you made a submission you will receive a formal response from the City, that will include your unique submission number (e.g. LGIP011). Using this unique submission number you can find the comments/points of submission you raised and Council's subsequent response.

To find Council's response to your submission, use the following instructions:

- For PC, press Ctrl-F (hold down the control key on your keyboard and press 'F')
- For Mac, press Command-F (hold down the command key and press 'F')

A search field should appear on your screen. Enter your unique submission number in the search field and click "Enter". If your submissions raised more than one issue there will be multiple responses throughout the report. To find all responses against your submission number use the following instructions:

- For PC, use the arrow keys to the right of the find box
- For Mac, use the next/previous buttons below the find box

Further support

Copies of the *Draft Local Government Infrastructure Plan Submissions Report* are available at the City of Gold Coast administrations centres in Nerang and Bundall. You will require your unique submission number to find the corresponding response.

If you are not able to locate your unique submission number, or for all other general enquiries regarding the draft LGIP, please contact Strategic Infrastructure on (07) 5582 8229.



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Section 1: General enquiries

Section 1.1: General LGIP growth assumption enquiries

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
1.1.1	LGIP001	Council should expedite the next review of the LGIP to cater for projected growth. Property sector is eager to work with Council to help identify future trunk infrastructure.	No	City officers are commencing work for the next review of the LGIP. The City intends working with industry and community groups to ensure the LGIP meets the needs of the City into the future.	No	No	Yes
1.1.2	LGIP002	Looking forward to receiving new data from the most recent census. LGIP must use the most current information available, be regularly updated, well integrated with other council documents and easy to use.	No	City officers are working on reviewing and updating the population and growth data, which underpins the planning assumptions in the City Plan and the LGIP. Once endorsed by Council this work will be used in the preparation of the next LGIP.	No	No	Yes
				There is a State legislative requirement to update the LGIP every five (5) years, but Council may choose to update it more regularly in response to new information, e.g. new census data.			

Section 1.2: General Priority Infrastructure Area (PIA) enquiries

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
1.2.1	LGIP003	Concerned PIA does not reflect extent of development approval over subject site.	No	The PIA must accommodate at least 10 years of non-rural growth and the City must be able to fund and supply adequate trunk infrastructure to service the identified growth. As a general rule, the PIA excludes rural zoned land. Future reviews of the LGIP will amend the PIA boundary taking into consideration areas approved for urban development, their stage of implementation and subsequent rezoning.	No	No	Yes
				Proponents are encouraged to act on their current development approvals and then approach Council for consideration of an appropriate zone once the development is completed.			

Section 1.3: General Desired Standards of Service enquiries

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
1.3.1	LGIP005	Noted the exclusion of the stormwater network from the draft LGIP.	No	The Stormwater Quality network is progressing in a separate amendment package as <i>Major amendment</i> for stormwater quality to the Local Government Infrastructure Plan and is currently with the State Government for their first review. This amendment package has been prepared in accordance with the Statutory Guideline 03/14: Local Government Infrastructure Plans (LGIP statutory guideline). As per the guideline, the LGIP contains planning assumptions, a priority infrastructure area, desired standards of service, plans for trunk infrastructure, schedules of works for planned infrastructure, and extrinsic material relevant to how the plan was prepared.	No	No	Yes
				The Stormwater Quantity network is being planned as a separate amendment package which City officers are currently progressing.			



Section 2: Public parks and land for community facilities enquiries (Parks)

Section 2.1: Parks Desired Standards of Service enquiries

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
2.1.	LGIP004	Concerned about the amount of open space proposed for the northern growth corridor given the expected population growth.	No	The Northern Growth Corridor contains high growth suburbs like Coomera and Pimpama. As such, significant Park Projects have been identified to accommodate the recreation needs of the future population in the northern growth corridor. This recognises the fact that the hinterland and beaches are located some distance from the growth Corridor. City Recreation Parks like Dixon Reserve identified in the LGIP will help cater for the growing need of high quality recreation facilities in this locality. By way of example there are 115 LGIP Park Projects in Coomera and Pimpama alone representing 30% of the total LGIP projects being 389 park projects. This is to be expected as a significant portion of the population growth will be located in these two localities (SA2s). In the context of the City's Desired Standards of Services for parks, the 3.218 Ha/1000 compared with the 4ha/1000 people is considered fair given the significant amount of other recreational lands that aren't included in the ratio such as the World Heritage Listed Hinterland and the world renowned beach spanning 57 km along the coast line. The embellishments planned for conservation areas are to be undertaken in accordance with	No	No	No
				management plans endorsed by Council. They are planned so as to preserve the conservation values of the relevant areas and include simple nature based recreational pursuits.			

Section 2.2: General Parks enquiries

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
2.2.1	LGIP006	Question regarding when new playground equipment will be installed at Flood Gum Park at Pacific Pines. There is a lack of play equipment near that part of Pacific Pines. It would be really appreciated if Council's Parks team could look into investing new play equipment there.	No	Thank you for your interest in your local park. Flooded Gum is a District Sports Park designed for AFL. There is also a dog off leash area near some bushland. The LGIP item is to support the primary use of the site being sport more specifically, lighting the fields to increase the capacity of the site to cater for more sport use. There is no suitable or adequate area on the sports field for play equipment. However, play equipment can be found close by in Parklake Park, approximately 320 m to the north. The land development guidelines (LDG) specify one play node for a district level sports park and the Desired Standards of Services in the LGIP specifies such a play node must be within 500m access to a local park experience. There is no criteria for minimum distance between play equipment; however, in the interest of a financially sustainable LGIP for the Parks network and lack of suitable area for a playground, no recreation facilities (playground equipment) were provided on this site given the close proximity to existing play equipment in Parklake Park.	No	No	No
2.2.2	LGIP007	There should be more facilities for horse riders in Ormeau. There is currently a Council maintained half sized arena on Orange Mountain Road Lot 96 on SP241239 this arena has a lot of open space around which could be fenced and turned into an equestrian park similar to Tom Rose Park in Nerang which has areas for dressage and jumping. The current half sized arena is used by over 40 local riders each week. Some afternoons it is extremely busy and being half sized it can be dangerous having someone jumping while others are riding. This would be an inexpensive facility they would also attract use from the surrounding areas.	No	The site in question does not have sufficient area or grades for additional horse facilities, however, there is a trail planned in the LGIP for Guanaba Reserve and a pony club planned in the Hinterland Regional Park.	No	No	No



Section 2.3: Parks planning assumptions enquiries

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
2.3.1	LGIP002	Have the impacts from large scale developments in the Tweed Shire e.g. Cobaki Lakes and Kings Forest been considered? Note: Council receives no infrastructure charges revenue for these developments since they are not in the city but will receive a large increase in demand for Gold Coast parks and community facilities.	No	City Parks Officers have assessed all major development applications in the Tweed including Cobaki and Kings Forest to ensure the applicant is complying with the NSW State legislation for supplying sport and recreation land for the increase in population. City Parks Officers have met with the Manager of Parks at Tweed Shire Council to ensure the applications provide sufficient open space areas for sport and recreation as the southern Gold Coast area is already at capacity in terms of sports fields. The population increase in NSW cannot be included in any LGIP Parks Planning therefore it is imperative to ensure that the major applications in the Tweed supply enough open space land for sport and recreation as the Southern Gold Sporting fields are already at capacity and cannot absorb any additional growth from across the border.	No	No	No

Section 2.4: Specific Parks projects

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
2.4.1		Concerned that a particular site subject to approvals for Integrated Tourist facility, vehicle sales premises and take away food premises. Recommend removal of item from parks schedule.	No	Agreed. Item is to be removed from the draft LGIP. The removal of this park does not affect the achievement of the Desired Standards of Service.	Yes	Yes	No
2.4.2		Concerned that LGIP proposes a local recreation park on a site that has an application lodged for multi-unit development.	No	Agreed. Item is to be removed from the draft LGIP. The removal of this park does not affect the achievement of the Desired Standards of Service.	Yes	Yes	No
2.4.3		Objection to District Sport Park proposed in Yatala as this site was recently included in the Urban Footprint in the SEQ Regional Plan.	No	The State issued approval for the draft LGIP to go on public notification, thereby endorsing the contents of the document for public review. It is also noted that in consultation with the State government, the planning scheme will be reviewed for alignment with the SEQ Regional Plan 2017 <i>ShapingSEQ</i> in upcoming amendments. This review may also result in amendments to the PIA.	No	No	No
				The SEQ Regional Plan identifies local areas for sport as integral components of well-planned urban areas in the Urban Footprint. Spatial and quantitative analyses identify the need for a large tract of land for sport to fulfil the Desired Standards of Service in the location of the subject site. For these reasons, the LGIP identifies the acquisition of the subject site in 2031.			



Section 3: Transport enquiries

Section 3.1: Transport Desired Standards of Service enquiries

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
3.1.1	LGIP004	Concerned about the decrease in road standards from C level to D level on new roads in the northern growth corridor.	No	A benchmarking exercise on the adopted Desire Service Standard (DSS) was undertaken by Cardno in early 2017. The benchmarking exercise compares the DSS currently adopted by different metropolitan councils in the southeast Queensland. The exercise has found that the Level of Service D, which is adopted by transport network in this LGIP, is generally consistent with other metropolitan councils within the region.	No	No	No
				The Level of Service D, which has been adopted by the City as the peak hour road performance targets at the design horizon (i.e. Year 2031), is also adopted by various road authorities for majority of urban road upgrade projects across Australia and New Zealand.			
				It is noted that motorists are expected to experience some level of congestion and delays at Level of Service D during the peak periods; however, the level of congestion is considered acceptable in an urban environment.			
				If the City continues with the Desire Service Standard (i.e. Level of Service C or better), it would result in more roads, wider roads, and larger intersections being built for the growing population. This would have the following impacts:			
				higher costs to build the roads;			
				• higher cost to reimburse developers for trunk roads provided by developers and hence higher rates for rate payers			
				• more land resumptions, potentially more impacts on environmental sensitive areas; and			
				• higher usage of private vehicle to travel, rather than other more sustainable modes, such as public transport, walking and cycle.			
				Therefore, Level of Service D, when combined with other public transport initiatives, should be maintained as the DSS for LGIP given that it provides the best practice in the industry, delivers the most cost-efficient outcomes and has less environmental impacts.			

Section 3.2: Transport planning assumptions enquiries

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
3.2.1		Have the impacts from large scale developments in the Tweed Shire e.g. Cobaki Lakes and Kings Forest been considered? Note: Council receives no infrastructure charges revenue for these developments since they are not in the city but will receive a large increase in demand for road use since most employment and other facilities are located within the Gold Coast.	No	The impacts from large scale developments outside our city, such as Cobaki Lakes, Kings Forest, Yarrabilba PDA etc, have been considered as part of the LGIP planning process. Residents, who live in these developments and travel to Gold Coast for work, are captured in the LGIP growth assumptions as employment growth. As the City grows and develops to accommodate for this planned growth, the City can therefore receive infrastructure charges for the new commercial developments in the City that attract cross-border traffic. Similarly, a proportion of new residents in Coomera would travel to Brisbane and Logan for work. Brisbane and Logan City Council would not be able to receive infrastructure charges from these new residential development in Coomera (City of Gold Coast would receive these charges); however, these Councils will benefit from the new commercial developments in their areas that attract Coomera residents to travel across LGA boundaries.	No	No	No
3.2.2	LGIP013	Request to consider major residential collector streets as trunk infrastructure.	No	A benchmarking study has shown the City's transport planning standards are generally consistent with other metropolitan councils in the region. Therefore the City does not intend to broaden the definition of trunk infrastructure to include major residential collector streets.	No	No	No



Section 3.4: Specific Transport projects

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
3.4.1	LGIP014	Request to include local road upgrades in the schedule of works in the LGIP.	No	The road in question is included in the draft LGIP as an existing trunk road.	No	No	No
			Much of the road is currently constructed to the trunk road standard. However, it is noted that a small section of the road would require minor works to provide kerb and channel and footpath.				
				Although it is impractical to identify all the minor upgrade works in the Schedule of Works for each road across the city, these minor works have been categorised as "Miscellaneous Trunk Works" and the funding requirements have been included in the Long Term Financial Forecast. As such, applicants would be eligible for refund (subject to other requirements) from City's "Miscellaneous Trunk Works" budget if these works are provided as part of a development application. However, the City would instead undertake these minor upgrades if these cannot be provided through the land development process.			
3.4.2		Concerned about future road network capacity in Pimpama area, including	No	The identified roads are discussed below.	No	No	No
		Railway bridge link, Pimpama Jacobs Well Road, Old Pacific Highway and Cunningham Drive.		Railway bridge link			
				The railway bridge connection is not considered as a trunk infrastructure, as it services the traffic from local catchment only.			
				Pimpama Jacobs Well Road			
				Pimpama Jacobs Well road between Depot Road and Old Pacific Highway services the local catchment only and does not have a through function; as such is not considered as trunk infrastructure in the LGIP.			
				Old Pacific Highway and Cunningham Drive			
				Based on the adopted growth projections, forecast traffic volumes on Old Pacific Highway and Cunningham Drive would not exceed the threshold of a 2-lane urban road at the LGIP planning horizon (i.e. Year 2031). Therefore a 4-lane upgrade of these two roads is not required.			

Section 4: Industry/Community group enquiries

Section 4.1: Industry/Community group enquiries

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
4.1.1	LGIP016	The planning assumptions should be based on the most current information available. It is recommended that Council review and update the data as soon as possible.	No	City officers are working on reviewing and updating the population and growth data which underpins the planning assumptions in the City Plan and the LGIP. The City monitors development and provides the information on its website. This information, together with current census data, will be considered in preparation of the growth projections for the revised planning assumptions, anticipated to be delivered mid to late 2018. Once endorsed by Council, this work will be used in the preparation of the next LGIP. Council intends to consult widely with industry in the preparation of the next LGIP.	No	No	No
4.1.2	LGIP016	A review should also be undertaken of the Priority Infrastructure Area (PIA) growth horizon, specific park and transport aspects and the opportunities for more efficient infrastructure delivery.	No	The PIA must accommodate at least 10 years of non-rural growth and the City must be able to fund and supply adequate trunk infrastructure to service the identified growth. The review of the LGIP will amend the PIA boundary as required. There is a State legislative requirement to update the LGIP every five (5) years, but Council may choose to update it more regularly in response to new information, e.g. new census data.	No	No	No
4.1.3	LGIP016	The exclusion of the stormwater network from the draft LGIP.	No	The Stormwater Quality network is progressing in a separate amendment package as <i>Major amendment</i> for stormwater quality to the Local Government Infrastructure Plan and is currently with the State Government for their first review. This amendment package has been prepared in accordance with the Statutory Guideline 03/14: Local Government Infrastructure Plans (LGIP statutory guideline). As per the guideline, the LGIP contains planning assumptions, a priority infrastructure area, desired standards of	No	No	No



#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
				service, plans for trunk infrastructure, schedules of works for planned infrastructure, and extrinsic material relevant to how the plan was prepared.			
				The Stormwater Quantity network is being planned as a separate amendment package which City officers are currently progressing.			
4.1.4	LGIP016	The PIA is not considered to accommodate an adequately long horizon of growth as it is too reliant on infill to meet housing needs. Also the assumed horizon of the LGIP is undermined as it will not effectively commence until	No	The PIA is the area prioritised for the provision of trunk infrastructure for the next 10 – 15 years. Having regard to the planning assumptions, it has the capacity to accommodate urban growth for this period.	No	No	No
		2018.		The draft LGIP is planned to be adopted by June 2018. However, the infrastructure planning contained within starts from a base date of 2016 and the assumed horizon of the LGIP will be 15 years from 2016. The City has complied with forecasting horizons required by the State and is required to review the LGIP every five (5) years.			
				The City of Gold Coast Council also undertook a Greenfield Land Supply Analysis in 2015 to confirm whether the City's 'ShapingSEQ' South East Queensland Regional Plan 'Expansion Area' (earlier referred to as the 'Infill Area') could accommodate the required 1/3 (43,000) of projected dwelling growth to 2036, as outlined in City Plan. At the time, the Analysis revealed that the Expansion Area could accommodate approximately 39,000 new dwellings, which equated to 20 plus years dwelling supply (based on the 5-year average for building approvals). ShapingSEQ has recently revised the ratio of dwelling growth in the Expansion Area to 20% (31,000 dwellings) for the period 2016-2041 to confirm the position of focusing growth in the Existing Urban Area (also referred to as the 'Consolidation Area').			
				A copy of the Greenfield Land Supply Analysis can be obtained at: http://www.goldcoast.qld.gov.au/documents/ma/planning-20160601-adopted_report.PDF (Item 3 on the Agenda).			
4.1.5	LGIP016	Material should be provided that explicitly indicates the overall level of coverage of infrastructure costs by the LGIP. This should also articulate the current and expected contribution of developers to infrastructure in the city.	No	Agreed. Information on these matters was provided in the financial extrinsic material that was published during the public submission period. Once the draft LGIP has had its final review and approval by the State Government and adopted by Council, the new LGIP will be incorporated into the City Plan and the extrinsic material reports will be made available on the City's website.	No	No	No
4.1.6	LGIP016	4.4-3 Transport network' should be revised to provide meaningful standards of service for general readers.	No	Due to the technical nature of transport planning and modelling, the transport standards are inevitably complex, and can be difficult to understand for general readers.	No	No	No
				A benchmarking exercise on the adopted Desire Service Standard (DSS) across all networks was undertaken by Cardno in early 2017. The exercise has found that the DSS adopted by transport network is generally consistent with other metropolitan councils within the region.			
				Further, the adopted transport DSS is also adopted by various road authorities in majority of urban road upgrade projects across Australia and New Zealand.			
4.1.7	LGIP016	Table SC3.1-3: Planned density and demand generation rate for a trunk infrastructure network' does not provide easily understandable and comparable demand generation rates.	No	Planned density and demand generation rates, for example vehicle trips per dwelling, for a trunk infrastructure network are required to comply with the State LGIP template. The LGIP has to address technical matters and those sections may not be easily understandable by the public. Notwithstanding this, the extrinsic material includes relevant background studies, further explanatory material and reports undertaken in the preparation of the LGIP and were available for viewing by the public during the submission period. Further guidelines on LGIPs (and their requirements) can be found on the Department of Infrastructure, Local Government and Planning website http://www.dilgp.qld.gov.au/infrastructure/lg-infrastructure-plans.html	No	No	No
4.1.8	LGIP016	The consultant that has performed the review has also carried out substantial parts of the LGIP and while permitted, allows doubts regarding the veracity of the plan and the associated assumptions.	No	Statutory Guideline 03/14 states a consultant who drafted an LGIP amendment for a local government can also act as the appointed reviewer provided they are on the "Panel of approved LGIP reviewers". The City is confident the appointed reviewer has acted with the fundamental ethical principles of integrity, objectivity, professional competence, due care and professional behaviour when undertaking the compliance check.	No	No	No
4.1.9	LGIP016	Insufficient information has been provided regarding changes in methodology for transport networks.	No	The transport network has prepared the LGIP based on the methodologies defined in the <i>Statutory Guideline 03/14: Local Government Infrastructure Plans</i> (LGIP statutory guideline). The State appointed reviewer has also affirmed that methodology adopted by the transport network meets the relevant statutory requirements.	No	No	No
				Detailed methodology for all networks are available on the Department of Infrastructure, Local Government and Planning's website http://www.dilgp.qld.gov.au/infrastructure/lg-infrastructure-plans.html			



#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
4.1.10	LGIP016	A review should be undertaken to rationalise the allocation of land in the following areas: • Yatala area road upgrades (such as Stanmore Road) that are prioritised over roads closer to the highway or around the Future Industry zone that is being developed • Yatala/Ormeau District Parks provision • Yatala/Ormeau parks generally in relation the level of supply across the city.	No	 The City has included the following road projects in the draft LGIP for Yatala area: Stanmore Road Stage 5 between Darlington Drive and Enkleman Road, with an indicative timing of 2016-2021 Stanmore Road Stage 4 between Harts Road to Beaudesert Beenleigh Road, with an indicative timing of 2016-2021 These two road projects, which cost approximately \$21M in total, will provide better critical connectivity to service the growing industry in the area. Parks have been identified throughout the city on a population demand basis against the Desired Standard of Service. In some cases, parks were identified based on the quality of the site and the price of the land. Therefore, the parks identified in the Yatala/Ormeau area are considered appropriate given the cost of land and the size of the parcel of land to meet the desired standard of service. There are a total of 15 projects in the high growth SA2 of Ormeau-Yatala, out of the total 385 projects. The availability and cost of land throughout the city was considered on a financial sustainability basis to ensure the overall trunk infrastructure works could be financially viable over the life of the LGIP over 15 years. 	No	No	No
4.1.11	LGIP016	A review should also consider whether embellishments and improved park use should occur across the whole park land parcel or only to the most accessible portions of the land.	No	The embellishments planned for parks are undertaken in accordance with management plans endorsed by Council. They are planned so as to enhance user experience and improve overall service standards for open space. Each park is designed to make best use of topography, site opportunities and constraints, community access and needs and existing parks infrastructure.	No	No	No
4.1.12	LGIP016	10- 30% contingency and on costs for infrastructure are considered excessive even though within the LGIP preparation rules.	No	The City has applied contingencies and on-costs in accordance with State guidelines: Appendix C – Schedule of works model user manual of <i>Statutory guideline 03/14 – Local government infrastructure plans</i> , which are substantiated by Evans and Peck, "Review of On Cost and Contingency Allowances" (undertaken for QCA), September 2009. This allows the City to mitigate the risk of undervaluing the provision of infrastructure, the applied contingencies and on-costs are refined as detailed drawings are drafted and construction is undertaken.	No	No	No
4.1.13	LGIP016	In the Extrinsic Material Report Financial Methodologies, the Institute notes that Council monitor 'actual growth and revenue receipts and prudently manage the timing of the delivery of trunk infrastructure'. The Institute believes that Council should also monitor other factors which influence the timing of the delivery of infrastructure including contingency savings, slow growth in an area and the identification of alternative infrastructure options.	No	The LGIP is a high level planning document which attempts to match infrastructure planning with land use planning over a 10 - 15 year time period. These matters are better able to be addressed when infrastructure items are included in the capital works program where variations are better able to be considered, planned and costed. The City monitors other factors which influence the timing of the delivery of infrastructure, including contingency savings, slow growth in an area and the identification of alternative infrastructure options. In response to these factors, necessary changes to the City's expenditure on trunk infrastructure are reflected in annual capital works budgets and quarterly revisions to capital budgets.	No	No	No
4.1.14	LGIP016	The LGIP should respect all existing development approvals which have commenced.	No	The City will continue to monitor development approvals and consider the implications for infrastructure planning as part of the review process of the LGIP.	No	No	No
4.1.15	LGIP016	Specific parks provision and transport items be reviewed for efficiency of allocation.	No	Specific parks provision and transport items have been reviewed for efficiency of allocation, and will continue to be coordinated to optimise cost efficiencies.	No	No	No
4.1.16	LGIP016	The LGIP should cover a period of 15 years to address the implementation delay and provide additional clarity around infrastructure planning and funding.	No	City officers refer to the draft LGIP in their assessment of development applications. Furthermore, the City will be amending the LGIP more regularly to provide additional clarity around infrastructure planning and funding and to prioritise the City's major growth fronts.	No	No	No
4.1.17	LGIP016	More work be undertaken to understand the infrastructure requirements being driven the Planning Scheme over the longer-term. Having this visibility beyond a 15-year horizon for all Infrastructure Networks will ensure that Council can better understand any potential for efficiencies in infrastructure delivery and investment and to more dynamically adapt to changes in development outcomes that occur over time.	No	Legislation requires 10 to 15 years planning be presented in the LGIP. Networks plan between 15 and 50 years into the future where reliable planning assumptions are available. This information is presented in the LGIP extrinsic materials. Furthermore, planning to Ultimate Development, i.e. the capacity of the City Plan, has been undertaken. A future revision of the LGIP will consider growth set out in the SEQ RP 2046 horizon.	No	No	No
4.1.18	LGIP017	Wastewater network: It is requested that all new wastewater infrastructure committed by the year 2021 under the Draft LGIP as shown in Figure 3 is implemented to ensure the continued growth of industrial development in the YEA within both fringe	No	Request noted. Updated network demands will be used to review network capacity and future infrastructure requirements commencing mid-2018. Significant infrastructure has been invested in this area to date.	No	No	No



Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
	areas and as infill.					
LGIP017	Wastewater network: Further augmentation of existing network eastern side of M1.	No	Request noted. Updated network demands will be used to review network capacity and future infrastructure requirements commencing mid-2018. Significant infrastructure has been invested in this area to date.	No	No	No
LGIP017	Wastewater network: To reflect current development approvals and industrial development currently under construction, it is requested that the sewer rising main identified as 'ST_XRMA07' and associated pump station 'BE44A_2026P' is identified for completion by 2021. This sewer rising main and pump station is currently being constructed as part of development of the Empire Industrial Estate.	No	Request noted. The next review, which is due to commence mid-2018, will incorporate new infrastructure and infrastructure under construction.	No	No	No
LGIP017	Water network: It is requested that all new water infrastructure committed by the year 2021 under the Draft LGIP as shown in Figure 5 is implemented to ensure the continued growth of industrial development in the YEA within both fringe areas and as infill.	No	Request noted. Updated network demands will be used to review network capacity and future infrastructure requirements commencing mid-2018. Significant infrastructure has been invested in this area to date.	No	No	No
LGIP017	Transport network: A number of planned trunk upgrades have been removed. These future upgrades are critical in meeting the current traffic demand, as well as accommodating logical expansion of industry with the YEA, both infill and in fringe areas. It is requested that Darlington Drive, Pearson Road, and Christensen Road be retained as committed road projects.	No	Darlington Drive Based on the adopted growth projections, forecast traffic volumes on Darlington Drive would not exceed the threshold of a 2-lane urban road at the LGIP planning horizon (i.e. Year 2031). Therefore a 4-lane upgrade of Darlington Drive is not required for this LGIP. The City will reevaluate this road should the growth projections be revised in the next LGIP amendments. Pearson Road Pearson Road is currently constructed to the collector road standard, and therefore is not considered as a trunk road. Christensen Road The proposed Christensen Road extension provides connectivity between two collector roads over Sandy Creek. As such, this extension is not considered as a trunk road upgrade and cannot be included in the LGIP program. However, the City will to consider this road upgrade project in other upgrade programs.	No	No	No
LGIP017	Transport network: The inclusion of intersections 'INT_066' and 'INT_009' as committed intersection projects are supported. However, the timing of delivery of 'INT_066' is requested to be identified for completion by the year 2021 to reflect current planned industrial development in this locality.	No	The City's transport modelling results suggest that these two intersections on Peachey Road would not require upgrade until 2026-2031 based on the adopted growth projections. However, the City will review and update the LGIP program when the growth projections are revised in the next LGIP amendments.	No	No	No
LGIP017	General: Illustration of ultimate trunk networks for wastewater, water, and transport are an important and informative tool to assist both individual site development schemes and/or overall investment in a specific area where upgrades are required. Based on the comments outlined in this submission, it is recommended that Council consider illustrating the ultimate trunk networks on all drawings, with consideration of those trunk networks indicated under the current LGIP, as shown in Figures 2, 4, and 6.	No	Although there are advantages with identifying trunk infrastructure to meet ultimate demand, the identification of trunk for a 15 years period complies with State requirements. Regular updates to the LGIP will occur to ensure this information is being communicated.	No	No	No
LGIP018 LGIP019	Concerned about the decrease in road standards from C level to D level on new roads in the northern growth corridor.	No	A benchmarking exercise on the adopted Desire Service Standard (DSS) was undertaken by Cardno in early 2017. The benchmarking exercise compares the DSS currently adopted by different metropolitan councils in the southeast Queensland. The exercise has found that the Level of Service D, which is adopted by transport network in this LGIP, is generally consistent with other metropolitan councils within the region. The Level of Service D, which has been adopted by the City as the peak hour road performance targets at the design horizon (i.e. Year 2031), is also adopted by various road authorities for majority of urban road upgrade projects across Australia and New Zealand.	No	No	No
	LGIP017 LGIP017 LGIP017 LGIP017 LGIP017	LGIP017 Wastewater network: Further augmentation of existing network eastern side of M1. LGIP017 Wastewater network: To reflect current development approvals and industrial development currently under construction, it is requested that the sewer rising main identified as "ST_XRMAO?" and associated pump station "BE44A_2026P" is identified for completion by 2021. This sewer rising main and pump station is currently being constructed as part of development of the Empire Industrial Estate. LGIP017 Water network: It is requested that all new water infrastructure committed by the year 2021 under the Draft LGIP as shown in Figure 5 is implemented to ensure the continued growth of industrial development in the YEA within both fringe areas and as infill. LGIP017 Transport network: A number of planned trunk upgrades have been removed. These future upgrades are critical in meeting the current traffic demand, as well as accommodating logical expansion of industry with the YEA, both infill and in fringe areas. It is requested that Darlington Drive, Pearson Road, and Christensen Road be retained as committed road projects. LGIP017 Transport network: The inclusion of intersections "INT_066" and "INT_009" as committed intersection projects are supported. However, the timing of delivery of "INT_066" is requested to be identified for completion by the year 2021 to reflect current planned industrial development in this locality. LGIP017 General: Illustration of ultimate trunk networks for wastewater, water, and transport are an important and informative tool to assist both individual site development schemes and/or overall investment in a specific area where upgrades are required. Based on the comments outlined in this submission, it is recommended that Council consider illustrating the ultimate trunk networks on all drawings, with consideration of those trunk networks indicated under the current LGIP, as shown in Figures 2, 4, and 6.	areas and as infill. LGIP017 Wastewater network: Further augmentation of existing network eastern side of M1. LGIP017 Wastewater network: To reflect current development approvals and industrial development currently under construction, it is requested that the sewer rising main identified as 'ST_XRMAD7' and associated pump station 'BE4AA_2026P' is identified for completion by 2021. This sewer rising main and pump station is currently being constructed as part of development of the Empire Industrial Estate. LGIP017 Water network: It is requested that all new water infrastructure committed by the year 2021 under the Draft LGIP as shown in Figure 5 is implemented to ensure the continued growth of industrial development in the YEA within both fringe areas and as infill. LGIP017 Transport network: A number of planned trunk upgrades have been removed. These future upgrades are critical in meeting the current traffic demand, as well as accommodating logical expansion of industry with the YEA, both infill and in firinge areas. It is requested that Darlington Drive, Pearson Road, and Christensen Road be retained as committed road projects. LGIP017 Transport network: The inclusion of intersections 'INT_066' and 'INT_009' as committed intersection projects are supported. However, the timing of delivery of 'INT_066' is requested to be identified for completion by the year 2021 to reflect current planned industrial development in this locality. LGIP017 General: Illustration of ultimate trunk networks for wastewater, water, and transport are an important and informative tool to assist both individual site development schemes and/or overall investment in a specific area where upgrades are required. Based on the comments outlined in this submission, it is recommended that Council consider illustrating the ultimate trunk networks on all drawings, with consideration of those trunk networks indicated under the current LGIP, as shown in Figures 2, 4, and 6.	Appendix of the relation Section Section	Area and as initial. LGP017 Wateroater review: Vale to produce the product	reference area as a fulfil. Colifornia Avancement removed. Avancement removed.



#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
				environment.			
				If the City continues with the higher Desire Service Standard (i.e. Level of Service C or better), it would result in more roads, wider roads, and larger intersections being built for the growing population. This would have the following impacts:			
				higher costs to build the roads;			
				• higher cost to reimburse developers for trunk roads provided by developers and hence higher rates for rate payers;			
				more land resumptions, potentially more impacts on environmental sensitive areas; and			
				• higher usage of private vehicle to travel, rather than other more sustainable modes, such as public transport, walking and cycle.			
				Therefore, that Level of Service D should be maintained as the DSS for LGIP given that it provides the best practice in the industry, deliver the most cost-efficient outcomes, and has less environmental impacts.			
4.1.26	LGIP018 LGIP019	Claim accepted international standard of open space provision is 4ha per 1,000 residents. Concerned LGIP aims to achieve 3.7ha per 1,000 residents and is only achieving 3.218ha.	No	In the context of the City's Desired Standards of Service (DSS) for parks, the 3.218 Ha/1000 compared with the average of 4ha/1000 people is considered fair given the significant amount of other recreational lands that are not included in the ratio such as the World Heritage Listed Hinterland and the world renowned beach spanning 57 km along the coast line.	No	No	No
				A benchmarking exercise was undertaken regarding the DSS in other SEQ Council and the City of Gold Coast was comparable to those standards. In the context of other non-LGIP open space (hinterland and the beach) the standard of 3.218 ha/1000 is considered appropriate for the Gold Coast.			
4.1.27	LGIP018 LGIP019	Council must put more planning into acquisition to ensure the needs of a growing population are met.	No	Parks are constrained by the Desired Standards of Service, the availability of land, the location, the cost and the topography of land in the City. The standard land area requirement was met for this LGIP. As the City grows there is competing demand for land including large sites for schools, shops and residential purposes.	No	No	No
				The City has commenced investigation into demand for future park land as part of the next LGIP review.			
4.1.28	LGIP018 LGIP019	Concerned about the lack of open space planned for high density areas and don't consider the beaches to be an adequate or suitable alternative.	No	A study was undertaken by the City to review the open space needs in high density areas. This issue will increasingly become prominent particularly along the light rail corridor. The City is currently involved in a working group to address this very issue.	No	No	No
4.1.29	LGIP018 LGIP019	Does parks planning consider tourist use of parks in planning for park provision?	No	Yes, tourist numbers were used in the growth projections. The City's survey work also includes tourist usage.	No	No	No
4.1.30	LGIP018 LGIP019	Concerned the LGIP does not provide for an increase in conservation areas and instead is planning embellishments to convert conservation areas to parks. Have no information on the intent of these embellishments.	No	The embellishments planned for conservation areas are to be undertaken in accordance with management plans endorsed by Council. They are planned so as to preserve the conservation values of the relevant areas and include simple nature based recreational pursuits.	No	No	No
4.1.31	LGIP018 LGIP019	Parks are classified according to the amount of flood free land available. Has the impacts of climate change and sea level rise been considered to ensure the flood free areas are sufficient?	No	Appropriate flood modelling has been undertaken to ascertain the impacts of sea level rise on the identified parks.	No	No	No
4.1.32	LGIP018 LGIP019	Have adequate shade areas been planned in parks?	No	Significant amount of shade trees are always planned around play nodes etc. in parkland designs both undertaken internally by Council and externally by applicants.	No	No	No
4.1.33	LGIP020	Request to upgrade Goldmine Road.	No	It should be noted that Goldmine Road has been included in the draft LGIP as a 2-lane urban road upgrade, rather than a 4-lane upgrade, with an indicative timing of 2026-2031.	No	No	No
				The City's transport modelling results indicate that Goldmine Road is expected to carry approximately 6000-7000 vehicles per day at the LGIP planning horizon (i.e. Year 2031) based on the adopted growth projections. This level of traffic would not require Goldmine road to be upgraded to a 4-lane road. However, a number of intersections along Goldmine Road could potentially require upgrade to address the operational issues when traffic continues to grow.			
				The operation of Goldmine Road and its intersections will be monitored over time to determine when operational issues arise. When the operation of the network is unsatisfactory, the City would develop			



#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
				appropriate upgrade solutions to address the operational issues.			
4.1.34	LGIP020	Subject land should be included in the PIA.	No	Presently the subject land is not used or approved for use for non-rural purposes and therefore has not been included within the PIA. As the site has recently been included within the SEQ Regional Plan urban footprint Council is currently undertaking a planning investigation to determine the development potential of the site. There are significant constraints to be addressed which preclude an assessment of likely infrastructure demand at this time. A decision will be made on inclusion within the PIA following the completion of the investigations.	No	No	Yes
4.1.35	LGIP020	LGIP should use the most current data for preparing the planning assumptions for the subject site.	No	The City is reviewing and updating the population and growth data which underpins the planning assumptions in the City Plan and the LGIP. Once endorsed by Council this work will be used in the preparation of the next LGIP.	No	No	No
4.1.36	LGIP020	Ormeau - Yatala floor space and employment projections should be updated to reflect the latest census data.	No	The City will continue to monitor development approvals and consider the implications for infrastructure planning as part of the review process of the LGIP.	No	No	No
4.1.37	LGIP020	Identifying the site for a large district sporting park and community facility is not an efficient use of land identified in the urban footprint as an identified growth area.	No	Identifying the site for sport is considered an efficient use of the land given that sporting field land is very difficult to locate in the city. The parks networks needs to meet the Desired Standard of Service in terms of quantum of sporting land per 1000 people. This site represents an opportunity to provide sporting land not just for the immediate vicinity but for the whole city. Surveys show that residents are willing to travel, especially to sporting parks.	No	No	No
4.1.38	LGIP020	The land allocated for the district park (80ha) far exceeds that required for a district park.	No	The draft LGIP nominates the minimum size for a district park as 10 hectares. Analyses identify the need for 80 hectares of land for sport in the north of the City to meet Desired Standards of Service for the quantum of land per 1,000 people.	No	No	No
				The District designation for the proposed sports park services the district needs of the area for the lifetime of the draft LGIP at the delivery year of 2031, when the population growth has been realised. The site will contain multiple district level facilities over many sporting codes. The synergies of locating the different district sporting clubs together means efficiencies in car parking and sharing facilities such as club houses and amenities. Users from nearby schools can reach these facilities by bus.			
4.1.39	LGIP020	Identifying the site for a large district sporting park is not appropriate given the flood prone nature of the land which does not meet the flood immunity guidelines for a park.	No	Flood risk will be ascertained at the design and construct phase to ensure the sporting field complies with design requirements.	No	No	No

Section 5: City of Gold Coast internal submissions

Section 5.1: City of Gold Coast internal submissions

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
5.1.1	LGIP021	The LGIP should include parks proposed in the Courtney Drive, Upper Coomera area.	No	The City recommends identifying this as trunk infrastructure in the draft LGIP in accordance with Council resolutions.	Yes	Yes	No
5.1.2	LGIP021	The embellishment rate included in the draft LGIP is based on the installation of a 3m wide concrete path and 1m of landscaping either side of the path. The current Hope Island Boardwalk network is lit to allow night use. As these future pathways will connect into the existing network, it is recommended that the embellishment rate is amended to allow for the installation of lights to		The City recommends proceeding with amendment as proposed.	Yes	No	No



#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
		reflect the existing infrastructure.					
5.1.3	LGIP021	The land value included in the draft LGIP requires adjustment. Many of the future parks listed in the draft LGIP have a land value of \$7.50 per 1m² - this reflects that the land that is provided for these parks is undevelopable (below Q100). A detailed review has confirmed that this rate has been applied to many future parks that are potentially developable. It is recommended that the land value is amended to reflect the offset value for the average land price in that SA2 where it's above Q100. Updated land valuation reports have also been undertaken to further refine the land cost for some high profile locations that may be considered contentious. These sites will also be amended to reflect the more realistic land valuation over and above the average SA2 land valuation.	No	The City recommends proceeding with amendment as proposed.	Yes	No	No
5.1.4	LGIP021	Due to changes during the budget process (cash flow adjustments, reviews and revised capital works plans etc.) the SOW and the current budget are not aligned and to the extent possible, it is desirable to bring the SOW and budget back into alignment during the changes made as a result of the public submissions prior to June 2018.	No	Changes in the timing or location of projects and which do not have an impact on the affordability of the LGIP do not require realignment of the Schedule of Works and budget.	Yes	No	No
5.1.5	LGIP022	Stormwater raised the need to consider opportunities for better coordination of infrastructure planning across networks for their future network planning.	No	All networks should consider multiple use of space to optimise synergies and minimise conflicts when planning their infrastructure.	No	No	No

Section 6: Other enquiries

Section 6.1: Matters not regulated by the Local Government Infrastructure Plan

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
6.1.1	LGIP008	The Have Your Say page needs to allow for broader comment on the Council and the selling of our parks.	No	This is not a matter that can be addressed by the draft LGIP. Enquiries, feedback and complaints can be made through the City of Gold Coast website under: Home > Online Services	No	No	No
6.1.2	LGIP009	Need to connect Mudgeeraba with train links to Southport.	No	This is not a matter that can be address by the draft LGIP. Rail is a State matter.	No	No	No
6.1.3	LGIP009	Concerned LGIP places too much emphasis on sport and suggests using sports stadiums for concerts. On the Gold Coast we have to travel so far to enjoy international artists and at great inconvenience.	No	This is not a matter that can be addressed by the draft LGIP.	No	No	No