



**Local Government Infrastructure
Plan Stormwater Quality
Draft Amendment**

Building our city, enhancing our lifestyle

Submission Report – March 2019

CITY OF
GOLDCOAST.

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 LGIP Stormwater quality draft amendment was completed in August 2018, following which Council endorsed the LGIP Stormwater quality draft amendment for public consultation. The official public consultation period was held from 2 October to 13 November 2018 (31 business days). Council officers reviewed all properly made submissions to the LGIP Stormwater quality draft amendment and a Council response to each submission is provided in this report.

Public consultation

During the public consultation phase, Council engaged the community through advertising and four public information sessions that were conducted at the City's administration centres at Bundall and Nerang, with hard copies of the LGIP Stormwater quality draft amendment available at these centres. The LGIP Stormwater quality draft amendment 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 three properly made submissions during the public consultation period, which were analysed into 13 separate points requiring consideration.

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. Final responses can be viewed within the table of this report – the *Local Government Infrastructure Plan Stormwater Quality Draft Amendment Submissions Report*.

All submitter comments or 'points of submission' are listed with the following 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 LGIP Stormwater quality draft amendment.
- 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. LGIPSWQ02). 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

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

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Section 1: General enquiries

#	Submission reference	Point of submission	State interest matter?	City response	Plan change?	Mapping change?	Future action?
1.1	LGIPSWQ01	Industry body has circulated the draft to members. Would like to organise future workshop to consider the water quality documents and to work with Council on water quality matters.	No	Council agrees Stormwater quality infrastructure is critically important to the ongoing health of the receiving environment. We look forward to further consultation with industry body members post implementation of the LGIP Stormwater quality amendment.	No	No	No
1.2	LGIPSWQ02	Support for the inclusion of the stormwater quality network within the LGIP in order to logically plan and strategically allocate stormwater quality infrastructure across the region.	No	Noted.	No	No	No
1.3	LGIPSWQ02	Support for network planning approach for stormwater quality for efficient and effective outcomes.	No	The City conditions each development to remove a percentage of the pollutants that the development will generate. With this approach, the pollutants to be removed and the percentages of pollutants to be removed, are consistent with the State Planning Policy July 2017 i.e. 90% Gross Pollutants > 5mm, 80% Total Suspended Solids (TSS), 60% Total Phosphorus (TP) and 45% Total Nitrogen (TN). The City's proposed LGIP amendment will not change the above described practices, acknowledging the important function provided by non-trunk development infrastructure. With non-trunk infrastructure removing only part of the pollutants generated by future development, the City is proposing a trunk infrastructure network that will remove the residual pollutant load generated by development. This is the Desired Standard of Service (DSS) for stormwater quality i.e. no worsening. This will occur within each of the City's regional service catchments i.e. the portion of pollutants generated by development not removed by non-trunk infrastructure, will be removed by trunk infrastructure.	No	No	No
1.4	LGIPSWQ02	Support for the inclusion of swale drains as trunk stormwater quality infrastructure within 'table 2.5-1: Trunk Stormwater Quality Infrastructure' that are a sustainable WSUD option.	No	Noted.	No	No	No
1.5	LGIPSWQ02	Concern regarding the omission of the stormwater quantity network within the amendment that would complete and complement the LGIP and clarify charges.	No	Council is currently investigating options for the inclusion of the stormwater quantity network in the LGIP. This requires consideration and resolution of technical, financial and planning objectives, which are being addressed. This work is ongoing.	No	No	No
1.6	LGIPSWQ02	Concern that the demand and growth assumption within the Long Term Financial Forecasts (LTF) differs from the LGIP, suggesting misalignment that could lead to incorrect outcomes.	No	Council will be monitoring the performance of the LGIP over time, including projected revenue and expenditure figures. Variances can be managed through adjustments to the capital expenditure budget in the short term. Over a longer time frame the LGIP will be reviewed and amended in accordance with legislative requirements.	No	No	No
1.7	LGIPSWQ02	Concern that the trunk stormwater quality items as part of this amendment do not adequately address the greater region, including the growth areas.	No	After development has provided non-trunk infrastructure compliant with development conditions, the residual development pollutant demand will be addressed by trunk stormwater quality infrastructure. Proposed trunk stormwater quality infrastructure have been identified and located to address the greater regional service catchments. For further explanation of the above, please refer to the "Extrinsic Material Report Stormwater Quality Network", Figure 1 on page 10. The most cost effective means of achieving the DSS, and hence servicing trunk demand, is to provide trunk stormwater quality infrastructure at locations where there are high pollutant load concentrations within each regional service catchment. Ideal sites for trunk stormwater quality infrastructure are typically located in areas within the regional service catchments external to development sites. As such Council believes the proposed trunk stormwater quality projects provide water quality coverage at a regional level, including growth areas.	No	No	No
1.8	LGIPSWQ02	Concern at some of Council's definitions of trunk infrastructure and non-trunk infrastructure items that may be inconsistent with state guidelines.	No	Council's identification of trunk and non-trunk infrastructure items are consistent with the "Ministers Guidelines and Rules Under the Planning Act 2016" (MGR). Non-trunk infrastructure is identified as that provided to service the subject site only. The City has conditioned developers to provide such infrastructure since circa 2000 and identified same as non-trunk. Whereas trunk infrastructure services only any net increase in	No	No	No

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				pollutant load caused by multiple developments within the City's service catchments. This approach is consistent with each of the relevant requirements set-out in the MGR, particularly Chapter 5, Part 4, Section 14.3 and Chapter 6, Part 2, Section 4.1.			
1.9	LGIPSWQ02	Concern at the uncertain effect of the cost of the network and the future quantity network on infrastructure charges that gives some uncertainty to industry operations.	No	Infrastructure charges are capped by the State and Council is not able to charge more than the maximum amount permitted.	No	No	No
1.10	LGIPSWQ02	Concerned the cost of the future quality network will impact on infrastructure charges and therefore create uncertainty for industry.	No	<p>Council charges 99.5% of the capped charges for residential uses to recover the cost of providing the water supply, sewerage, transport and public parks and land for community facilities networks.</p> <p>The 0.5% reduction is not:</p> <ul style="list-style-type: none"> • derived from the removal of the stormwater networks • the cost of supplying the trunk stormwater infrastructure network • a reduction from the actual cost of supplying five infrastructure networks. <p>The charge for residential uses recovers the cost of providing the water supply, sewerage, transport and public parks and land for community facilities networks.</p> <p>City officers have instigated initiatives to ensure the formulation of future amendments and new LGIPs are cost effective and transparent.</p>	No	No	No
1.11	LGIPSWQ03	Request extension of time to undertake and submit review of base unit rate costs.	No	<p>The request was not granted as timeframes are set by legislative guidelines.</p> <p>Council had the unit rate costs of the LGIP independently reviewed in 2017. They were found to be comparable with similarly sized Councils in South East Queensland. It is not considered necessary to duplicate this work so soon after it was completed.</p>	No	No	No
1.12	LGIPSWQ03	Submitter suggests another product may be a more suitable water quality treatment solution for Council.	No	Noted.	No	No	No
1.13	LGIPSWQ03	Performance of quality infrastructure devices depends upon ongoing maintenance. Actual performance may be less than modelled if maintenance is not appropriate.	No	Council accepts performance of quality infrastructure depends upon maintenance and will ensure infrastructure items will be appropriately maintained over time.	No	No	No