

Reference: 3631
Council Reference: MCU/2025/53

8 May 2025

The Chief Executive Officer

Council of the City of Gold Coast

Attention: Mr Conor Pizzolato

BY EMAIL: cpizzolato@goldcoast.qld.gov.au & mail@goldcoast.qld.gov.au

Dear Conor,

RE: RESPONSE TO INFORMATION REQUEST FOR A DEVELOPMENT PERMIT FOR MATERIAL CHANGE OF USE (CODE ASSESSMENT) FOR MULTIPLE DWELLING AND SHORT-TERM ACCOMMODATION (56 UNITS)

SITE: 19 ANNE STREET, BROADBEACH
LOT 0-8 BUP1114

1 Introduction

Urban Planning Services Pty Ltd ('**UPS**') acts on behalf of Mary Anne Development Pty Ltd (the '**Applicant**') to respond to an Information Request from Council relating to the Development Permit for Material Change of Use (Code Assessment) for Multiple Dwelling and Short-term Accommodation (56 Units) (the **'proposed development'**), on the site located at 19 Anne Avenue, Broadbeach (the **'subject site'**).

The Information Request was issued by the City of Gold Coast Council ('Council') as assessment manager on 1 April 2025.

This correspondence is also accompanied by supporting documents and additional information, where required, in response to the CCGC Information Request. The volume structure of the supporting documents is as shown below.

ATTACHMENT NO.	DOCUMENT
Section 1 – Supporting Material	
1	CoGC Information Request dated 1 April 2025
Section 2 – Technical Material	
2	Traffic Impact Assessment prepared by Rytenskild Traffic Engineering
Section 3 – Drawings	
3	Architectural Plans prepared by BDA Architecture
4	Landscape Design Intent prepared by LDG Landscape Architects

As the Development Application was made with Council via electronic lodgement, this Information Request Response is provided via electronic submission.

Information Request Response Items

Transport Assessment

1. Servicing

The proposed location of the 'standing area' for a Medium Rigid Vehicle (MRV) represents several conflicts with Transport code outcomes, as follows.

a. *The proposed MRV 'standing area' conflicts with vehicle access to/from the site (does not allow two-way access for passenger vehicles to be maintained). An alternative location for MRV servicing (on-site) is requested to be demonstrated, supported by swept paths showing the ability for two-way passenger vehicle access to be maintained on-site (i.e. passing provision, at ground level) when an MRV is positioned in the 'standing area').*

b. *Swept paths showing access to/from the proposed MRV standing area show use of the 'turn from stop' function. Revised swept paths are requested to be submitted demonstrating access by an MRV to and from the standing area without using the 'turn from stop' function (and ensuring the vehicle position is maintained within the kerbside travel lane i.e. does not cross over the centre of Anne Avenue to enter or exit the site). Modification to the alignment of the vehicle crossover may be required, to align with the driveway (while ensuring that a compliant pedestrian sight triangle is maintained on the departure side of the western driveway).*

c. *It's unclear how far back the (minimum) 4.5m vertical clearance extends, from the front property boundary. Submit a drawing clearly depicting the length of driveway that accommodates compliant vertical clearance for an MRV.*

d. *The proposed MRV standing area is only 8.7m long; the standing area is requested to be 8.8m long (minimum).*

e. *The MRV standing area may be reduced to 2.5m wide (rather than 3.5m), as it is a standing area (rather than a dedicated service bay).*

RESPONSE

Rytenskild Traffic Engineering has reviewed this item and has provided a written response via a report – see **Attachment No. 2.** In summary, this item has been dealt with to ensure the MRV is clear of the swept paths and the standing area has been increased to accommodate the MRV standing on site at the desired location.

✓ The Applicant is of the view that this item has now been fully addressed.

2. Active transport networks

Demonstrate the provision of the following pedestrian infrastructure on the development drawings:

a. A new 2m wide footpath along the site's frontage to Anne Avenue.

b. A minimum 1.5m wide 'connecting' pathway, located within the verge of Anne Avenue, connecting the development's proposed pedestrian access point to the new frontage road footpath.

RESPONSE

Rytenskild Traffic Engineering has reviewed this item and has provided a written response via a report – see **Attachment No. 2.** BDA Architecture have updated the drawings to ensure the footpaths are as per the desired design. Please refer to the updated Architectural Drawings within **Attachment No. 3.**

✓ The Applicant is of the view that this item has now been fully addressed.

3. Ingress and egress

Performance outcome PO14 of the Transport code requires all vehicles to enter and exit the site in a forward gear. Additional information is required to demonstrate compliance with PO14, including:

a. *Submit a swept path demonstrating the ability for a B85 vehicle to turn around using the proposed turning bay located in the visitor car parking aisle (noting that the proposed turning area is impacted by columns and is only 2.3m wide, and is accessed from an aisle width of only 5.8m, instead of 6.1m).*

   Note: a compliant number of visitor car parking spaces must be maintained with any changes proposed to accommodate a compliant turn-around area.

b. *Provide further information regarding the intended function of the porte cochere and drop-off area.*

RESPONSE

Rytenskild Traffic Engineering has reviewed this item and has provided a written response via a report – see **Attachment No. 2**.

✓ The Applicant is of the view that this item has now been fully addressed.

4. Integrated transport and land use

The development's trip generation has been calculated incorrectly in Table 9.1 of the Transport Impact Assessment (the table applies a trip rate based on the number of bedrooms to the total number of dwellings). Trip generation for the development would be significantly higher than that illustrated in Table 9.1 of the report (more in line with that indicated in Section 5.2 of the report). All SIDRA assessments shall be revised and resubmitted on this basis. Any mitigation measures or upgrade works required to Council's road network as a result of development traffic should be identified and supported by functional layout drawings, where relevant.

RESPONSE

Rytenskild Traffic Engineering has reviewed this item and has provided a written response via a report – see **Attachment No. 2**. The trip generation has been rectified, and the full response can be found within **Attachment No. 2**.

✓ The Applicant is of the view that this item has now been fully addressed.

5. General

The proposed vehicle access and circulation arrangements demonstrate a number of non- compliances with AS2890.1 and Transport code requirements. Amendments to the proposal are requested to resolve the following issues:

Note: the traffic report appears to confuse 'basement' and 'podium' levels, particularly with respect to swept paths; the items contained herein refer to basement and podium levels as indicated on the development drawings (i.e. basement access from the western driveway, podium access from the eastern driveway):

a. *Swept paths show that two-way, two-lane vehicle access is not achieved for access between the ground floor and basement level (western access); however, ramp management measures have not been identified. Development drawings are required to identify the location of a hold line at ground level (for vehicles entering the site), supported by swept paths demonstrating (a) the ability for a B99 vehicle (exiting the basement) to pass a vehicle waiting at the hold line, and (b) the ability for a B99 vehicle to move from the hold line to the basement ramp.*

b. *Further to item b, submit a queuing assessment identifying the 95th percentile vehicle queue expected in relation to ramp management measures for access to basement levels (western access). The hold line at ground level is to be positioned to provide sufficient queuing provision, consistent with the queuing assessment. The hold line position must also maintain two-way passenger vehicle access when an MRV is on- site, as per item c, below).*

   Note: a probability-based queuing assessment is required, quantifying the 95th percentile queue expected; the statement in the Transport Impact Assessment that 'it is considered the probability of a queue extending more than one vehicle during peak hour operation of the development is low' is insufficient.

c. *Two-way passenger vehicle access to/from the site (western access) is not maintained when an MRV is on-site. Swept paths are required demonstrate the ability for passenger vehicles to pass each other at ground level when an MRV is on-site.*

d. *Within podium levels, the hold line location and vehicle position (for exiting vehicles) do not match. Revised swept paths are requested to demonstrate the ability for an exiting vehicle to move into the proposed hold line position (without corrective movements), and for an entering vehicle to pass a vehicle waiting at this location. Alternatively, the hold line location may be modified to match the swept path - however, a passing vehicle must still be able to maintain compliant clearances to the hold line, when passing.*

e. *Within podium levels, swept paths for the 'inside' movement (entering vehicles) are based on a B85 vehicle; as this represents the most constrained circulation movement, swept paths must be undertaken using a B99 vehicle, in accordance with AS2890.1 requirements; in addition, compliant circulation clearances must be demonstrated for this movement (600mm clearances on the outside of the swept path, not 300mm as shown; and 300mm clearances on the inside of the swept path).*

   Note - if compliant passing provision cannot be demonstrated within podium levels, and all passing is required to occur at ground level, sufficient queuing provision must be demonstrated (95th percentile vehicle queue).

f. *Swept paths (eastern vehicle access) demonstrate that a vehicle waiting at the proposed hold line (entering the site) would overhang the front property boundary; all vehicle queuing must be contained within the boundaries of the site. Any change to the location of the hold line is requested to be supported by swept paths demonstrating the ability for (a) an entering vehicle (B99) to move from the hold line to the podium ramp, without corrective movements; and (b) for an exiting vehicle (B99), leaving podium levels, to pass a vehicle waiting at the hold line.*

g. *Further to item f, submit a queuing assessment, identifying the 95th percentile vehicle queue expected in relation to ramp management measures for access to podium levels (eastern access). The hold line at ground level should be positioned to provide sufficient queuing provision, consistent with the queuing assessment. Any change to the location of the hold line is requested to be supported by swept paths demonstrating vehicle access to the podium ramp (from the hold line), and passing of the hold line location by an opposing vehicle (i.e. two-way access).*

   Note – a probability-based queuing assessment is required, quantifying the 95th percentile queue expected; the statement in the Transport Impact Assessment that 'it is considered the probability of a queue extending more than one vehicle during peak hour operation of the development is low' is insufficient; further, the statement in the Transport Impact Assessment that 'there is sufficient space available for a second vehicle to queue clear of the frontage roadway without blocking exit travel route from the site' is incorrect.

h. *Swept paths are requested to be submitted demonstrating vehicle circulation within basement levels, with any need for management of opposing vehicle movements clearly demonstrated, and measures reflected on development drawings (note - swept paths have only been provided for circulation in podium levels).*

   Note - if compliant passing provision cannot be demonstrated within basement levels, and all passing is required to occur at ground level, sufficient queuing provision must be demonstrated (95th percentile vehicle queue).

i. *The 'centreline' of all hold lines are to be appropriately positioned to guide vehicles into the correct position, and to allow opposing vehicles to pass the hold line with compliant clearances maintained (to be clear, centrelines of hold lines, in all cases, are located too far over the 'centre' of the respective aisle and do not reflect vehicle movements, as shown in swept paths).*

j. *Swept paths show vehicles are unable to successfully exit visitor car parking space V1 - swept paths show a vehicle driving through the gate at the top of the basement ramp. This is likely due to the non-compliant aisle extension (<1m) at the end of*

the visitor parking aisle and also the non-compliant aisle width (5.75m measured to the gate at the top of the basement ramp).

k. *Demonstrate a compliant width for the visitor car parking aisle (width of 6.1m required, between edge of parking spaces and vertical obstructions located opposite). Widths as low as 5.75m are currently shown.*

l. *Identify the space located between visitor car parking spaces V5 and V6 as 'No parking'.*

m. *The vehicle crossover and driveway (western access) do not align; demonstrate how the driveway area leading to the crossover (on exit from the western driveway) will be treated to guide vehicles appropriately (and preserving the pedestrian sight triangle area).*

n. *Ensure pedestrian sight triangles are shown consistently across all application material (and in compliance with AS2890.1 and AS2890.2 requirements). Figure 6.1 of the Transport Impact Assessment shows pedestrian sight triangles in locations inconsistent with the development drawings (particularly on the departure side of the western driveway). Development drawings shall include the following notation in relation to pedestrian sight triangles: 'Pedestrian sight triangles to be kept clear of obstructions to visibility. Low level landscaping permitted to a maximum mature height of 500mm above driveway level'.*

RESPONSE

Rytenskild Traffic Engineering has reviewed this item and has provided a written response via a report – see **Attachment No. 2**. Where necessary, the architectural drawings have been updated to reflect the changes made within the Information Request Response. Please refer to the written response by Rytenskild Traffic Engineering and the updated Architectural Drawings prepared by BDA as the response to this item.

✓ The Applicant is of the view that this item has now been fully addressed.

Architecture Assessment / Planning Assessment

6. Podium bulk, form and scale

The development proposes a 13.45m high podium (including planter edge) with reduced setbacks to the side and rear boundaries of 1.15m and 0m to the Anne Avenue street frontage. This results in a bulky and dominant form. Officers note that the Light rail urban renewal area overlay code allows for built-to-boundary podiums which can extend to the street edge.

However, it is equally as important that they present a form congruent with the character of the area, with generous landscaped areas, opportunities to engage with street life, well-defined, clearly visible entrances and screened podium parking.

The current ground plane and podium form does not achieve these outcomes. In accordance with Overall outcome OO(3)(a)(i)&(iii), 3(b)(ii), 3(c) and 3(e)(ix) of the Light rail urban renewal area overlay code, Performance outcomes PO1 and PO2 of the High density residential zone code and PO1, PO2 and PO3 of the High rise accommodation design code, the applicant is requested to:

a. Provide a central recess within the podium towards the street frontage, to allow for a canopy tree to be accommodated at ground level (either in deep planting or raised planter box). The central recess must achieve a height and width that permits a canopy tree to grow without impacting upon the podium form.

b. Reduce the length of the podium form which interfaces with the streetscape, by removing some of the storage cages proposed at the podium levels.

c. Incorporate a combination of central recesses and shortened length of podium walls along the side and rear, to assist with reducing the length / bulk of the podium.

d. Provide the podium level landscaping on the architectural plans.

e. Provide additional opportunity for activation and amenity at the ground plane ie: integrated landscaping, seating etc.

f. Tier or reduce the height of the top level (Level 4) podium screen to reduce the perception of height and ensure that generous landscaping is visible. Consider dropping the height of the landscape planter box on the podium level to be partly recessed within the roof of podium parking level 3 to assist with reducing the visual dominance / height of the podium upon the streetscape.

g. Consider additional pockets of landscaping within the podium facades to further soften the built form.

h. Consider utilising a variety of colours, materials and textures to create a visually interesting podium form which complements the tower design.

i. In combination with providing recesses to the side and rear of the podium, utilise colours and materials to emphasize these recesses.

RESPONSE

The podium design has incorporated the changes based off the requested items from the Information Request and the on-site meeting with City officers.

a) The podium now contains a central recess which ties the design of the tower to the podium by replicating the materiality and design of the tower recess. This creates a consistent architectural language between the tower and podium whilst simultaneously providing a visual break and reducing the bulk of the podium from the street. The podium central recess has been provided however the provision of the feature tree has not been included due to the impacts this would have on the pedestrian connectivity into the development and the presentation to the street. The landscaping has been significantly enhanced from the previous plans and this is anticipated to appropriately soften the podium whilst still providing a layered landscaping outcome.

b) The scalloping of the podium in the corner has facilitated some deeper planting to accommodate small trees and large shrubs. The design of the podium will allow for the climbing species to create a green wall effect as the landscaping grows up the podium, further softening the built form from the street. A comparison of the podium design is shown below.

c) The scalloping of the podium corners and the central recess has significantly reduced the extent of podium wall which interfaces with the street. The previous podium wall continued for majority of the street frontage. The updated architectural drawings demonstrate the extent of wall has been reduced by approximately 40%.

d) Landscaping is now shown within the podium renders.

e) Activation and amenity has been enhanced via the additional landscaping and the bench seating at the front entry.

f) Generous landscaping on the recreation deck is now visible from the ground level. This will cascade down the front face of the podium to work with the landscaping proposed to climb up the podium. Additionally, the landscaping pockets within the corners of the podium will facilitate a large shrub/small tree which will create a multi-layered landscaping effect when viewed with the front pedestrian entry.

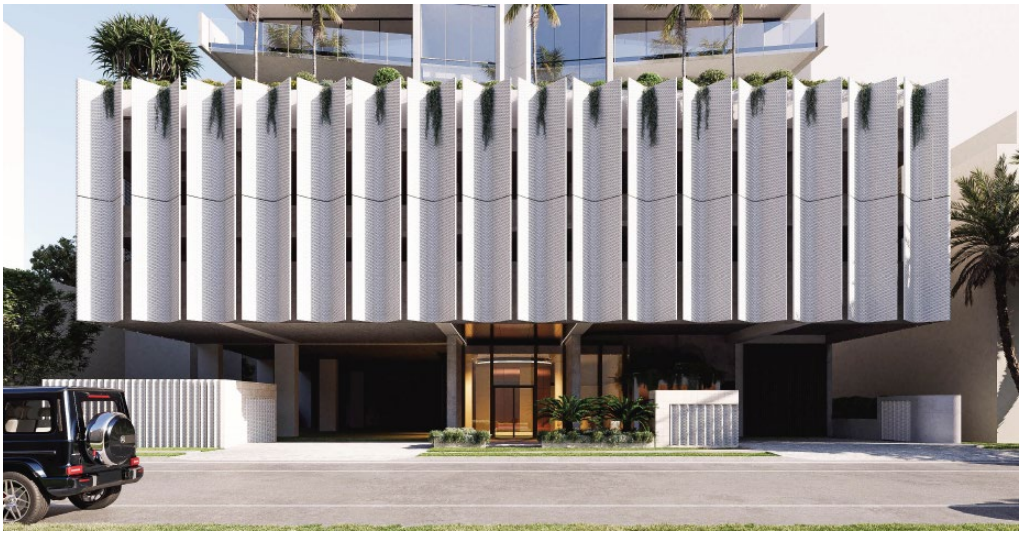
g) Extra pockets of landscaping have been added to the development.

h) The design elements from the tower have been incorporated into the podium to continue the architectural language into the podium.

i) Additional materials have been incorporated into the podium façade to assist with the design being softened through various colours and materials in addition to enhanced landscaping outcome to emphasise the recessive design.

Please refer to the updated Architectural Drawings within **Attachment No. 3** for the revised design.

Original Podium Design



Proposed Podium Design



✓ The Applicant is of the view that this item has now been fully addressed.

7. Additional information

The applicant has not provided sufficient information for the podium finishes. To allow further assessment, the applicant is requested to provide the following:

a. Provide a large-scale podium elevation from the north, demonstrating a high quality finish and materials to the rear interface.

b. Provide updated perspectives of the podium with the above changes incorporated, in addition to realistic landscaping and context.

RESPONSE

BDA Architecture have provided the large-scale podium elevation form the north to demonstrate the high quality architectural finishes and materials used for the northern interface. Please see the response to the northern elevation at the end of the Architectural Package (**Attachment No. 3**).

This package also contains the updated perspectives including the architectural changes and realistic landscaping. An example of this perspective is shown below.



✓ The Applicant is of the view that this item has now been fully addressed.

Landscape Assessment

8. Frontage landscaping

The proposed size and scale of the podium is considered to achieve a dominant built form to the Anne Avenue road frontage with little opportunity to incorporate substantially sized landscaping at an appropriate setback from the building. The podium, combined with the service locations, are considered to negatively exacerbate the perceived bulk of the built form with little landscaping incorporated to assist in softening these elements.

To assist in demonstrating the amenity requirements of Performance outcomes PO1 and PO2 of the High density residential zone code and Performance outcome PO4 of the General development provisions code are met, City officers request the applicant amend the design of the podium, ground floor level configuration and setbacks to reflecting the following:

a. *A minimum one (1) landscape garden bed capable of supporting a tree planting is requested to be proposed within the site along the front boundary. The garden bed is suggested to be proposed at grade within the adjacent road verge and contain a minimum width of 1.5 metres and contain a minimum surface area of 6sqm.*

b. *The ground floor level is requested to include a large raised planter area within the frontage capable of supporting a feature tree planting. In order to support a tree, the planter is requested to be designed to achieve a minimum soil depth of 1m, a minimum width of 1.5m and achieve a minimum surface area of 6sqm.*

c. *The podium is requested to be re-designed to provide sufficient setback to allow for the requested tree planting described in part a of this item to be open to the sky and achieve a minimum 3m setback from the edge of the podium to allow for future canopy growth.*

d. *The podium façade design is requested to be amended to allow for additional landscaping opportunities through raised planters which are viable and accessible for cascade plantings.*

e. *Updated cross-section drawings are requested to be included within updated architectural and landscape drawings of the frontage landscaping design.*

f. *An amended Statement of Landscape Intent (SLI) is requested to be submitted reflecting any changes to the site layout as a result of this information request letter.*

RESPONSE

An updated Statement of Landscaping Intent (SLI) has been included to reflect the proposed architectural outcome.

It is acknowledged that whilst a landscaping planter has not been provided suitable to accommodate a tree at the ground level. Whilst this has not been provided, the layered landscaping is considered to be providing an enhanced landscaping outcome which will be immediately experienced from the street frontage. There are now multiple opportunities for landscaping across the development which will have immediate effective rather than waiting for a single feature tree.

The SLI has been updated to reflect the proposed design with the relevant sections as requested – see **Attachment No. 4.**

✓ The Applicant is of the view that this item has now been fully addressed.

9. Ground Floor landscaping – north and east boundary

Officers have concerns with accessibility to the raised podium planter along the northern and eastern boundaries at the ground floor level. In particular, the approximate 1m wide raised planter does not provide direct access from one side of the planter to allow for regular garden maintenance. Accordingly, officers request the applicant either provide clarification on how these planters will be accessed or amend the design to allow for access.

RESPONSE

The updated SLI demonstrates the maintenance access locations for the proposed development. Please refer to **Attachment No. 4**.

✓ The Applicant is of the view that this item has now been fully addressed.

10. Anne Avenue street tree planting

The Anne Avenue streetscape adjoining the subject site includes overhead powerlines, limiting opportunity for substantially sized street tree plantings to be incorporated within the road reserve. To allow for future street tree planting in compliance with Performance outcome PO7 of the Driveway and vehicle crossings code, the applicant is requested to:

a. *Clarify if the existing power lines within the road reserve will be retained or if the power will be redirected underground. Where overhead powerlines are to be redirected underground, large Araucaria columnaris (Cook Pine) street tree specimens are requested to be proposed consistent with the streetscape.*

b. *Show street tree planting at centres in compliance with Standard drawing 05-103 within SC6.12 City Plan policy – Land development guidelines is requested to be proposed within the Anne Avenue road reserve.*

c. *Provide an amended Statement of Landscape Intent (SLI) reflecting any changes.*

RESPONSE

The proposed development will be powered by underground power. As such, there are opportunities for a Cook Pine to be included on the street frontage. The Cook Pine has been included in the design and forms part of the SLI and updated architectural drawings.

✓ The Applicant is of the view that this item has now been fully addressed.

Water and Waste

11. Waste servicing

Council acknowledges that a waste servicing/temporary storage point is allocated and identified on the plan and a waste management plan has been provided. However, the size of this location fails to accommodate all the bins required for the development to manage the solid waste generated.

While the total number of bins is three, the waste servicing point can only handle two bins at a time. To ensure that all waste from the waste room can be serviced at any time without any space constraints, applicant is requested to demonstrate a waste servicing location that can accommodate all the allocated bins for the proposed development.

RESPONSE

The temporary storage point has been designed to accommodate the bins for one (1) full waste stream type to be collected at a time. Our development will alternate collection days for General Waste and Recycling Waste. For example, as we provide 2 bins for the general waste and 1 bin for the recycling, the temporary bin storage only needs to accommodate a maximum of 2 bins on any given day. The capacity for the waste servicing/temporary storage point to hold one full waste stream (in this case two (2) bins) is consistent with the implementation of temporary storage points typically provided within the City.

MRA have provided a Waste Management Plan which clearly demonstrates the waste collection frequencies – see table below.

Table 4: Details of proposed bins & servicing frequency

Waste Type	Waste Quantity (m^3/week)	Bins Proposed in Area	Collection Frequency
General Waste	6.72	2 x 2.0m^3 bulk bins	Two times per week
Recycling	4.48	1 x 2.0m^3 bulk bins	Three times per week

✓ The Applicant is of the view that this item has now been fully addressed.

Conclusion

With reference to the *Planning Act 2016*, this is a full and complete response to the Information Request issued by City of Gold Coast Council.

As requested in Council's Information Request, on account this Application was lodged electronically; a sole electronic response is provided in the form of a consolidated PDF.

Should you have any further questions during the assessment of this Development Application then please do not hesitate to contact our Mr Jack Collings on telephone number (07) 5570-4994 or by email jcollings@urbanps.com.au.

Yours Faithfully



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